



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

October 4, 2018

Mr. James D. Maile
HarbisonWalker International
1301 East 8th Street
P.O. Box 807
White Cloud, Michigan 49349

SRN: B5777, Newaygo County

Dear Mr. Maile:

VIOLATION NOTICE

On August 30, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of HarbisonWalker International located at 1301 East 8th Street, White Cloud, Michigan. The purpose of this inspection was to determine HarbisonWalker International's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) numbers 184-07A and 24-10A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-G40	PTI No. 184-07A, EU-G40, Special Condition (SC) IV.1; Rule 910	Unsatisfactory operation of dust collector G40.
EU-G43B	PTI No. 184-07A, EU-G43B, SC IV.1; Rule 910	Unsatisfactory operation of EU-G43B
EU-G43B	PTI No. 184-07A, EU-G43B, SC VIII.1	Stack emissions venting horizontally
Facility Wide	Rule 370(1)	Emissions not properly collected and venting externally.

Emissions from EU-G43B at the time of the inspection were not being captured by dust collector G43B, which was offline until bags for the unit could be replaced. The emissions were being diverted to dust collector G40. This is a violation of PTI No. 184-07A, EU-G43B, SC.IV.1 and Rule 910.

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The stack associated with EU-G43B is not being vented unobstructed vertically as was permitted. The emissions are being emitted horizontally and this is a violation of PTI No. 184-07A, EU-G43B, VIII.1.

Based on the observations made regarding dust collector G40, it was concluded that the dust collector was not operating satisfactorily. Therefore, this is a violation of PTI No. 184-07A, EU-G40, SC.IV.1 and Rule 910.

Particulate matter emissions were not being collected and were observed during the inspection to be venting externally through a window from the main building. This is a violation of Rule 370(1).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 25, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to the DEQ, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Please include in the response the following:

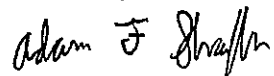
- Reviewing the MAP, instances were noted where operating variables had been exceeded and corrective actions did not appear to have been completed to address the issues. Additionally, changes to reflect current site procedures were also identified by the company during the course of the inspection. Please resubmit a revised MAP to include specific ranges of satisfactory operation, corrective actions to be completed if values are not within that satisfactory range, and acceptable time frames for issues to be addressed.
- Please provide an applicable exemption for dust collector G43 or a Permit to Install application.

If HarbisonWalker International believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of HarbisonWalker International. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Adam F. Shaffer
Environmental Quality Analyst
Air Quality Division
616-356-0767

cc: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Heidi Hollenbach, DEQ