



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

February 15, 2017

Mr. Bruce Morgan
Harbison Walker International, Inc.
1305 Cherrington Parkway, Suite 100
Moon Township, Pennsylvania 15108

SRN: B5777, Newaygo County

Dear Mr. Morgan:

VIOLATION NOTICE

On January 17, 2016, the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), received a verbal notification by Harbison Walker International, Inc. located at 1301 East 8th Street, White Cloud, Michigan that a malfunction of the catalytic oxidizer had occurred on January 16, 2017. The notification was used to determine Harbison Walker International, Inc'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) number 24-10A.

During the review of the verbal and written documentation provided, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-BrickOvens	PTI No. 24-10A, Special Condition (SC).IV.1; Rule 910	Failure to properly maintain and operate the catalytic oxidizer
EU-BrickOvens	PTI No. 24-10A SC.I.1 & I.3	Exceeded hourly VOC and formaldehyde limits

Special Condition IV.1 of PTI number 24-10A requires the catalyst bed inlet temperature of the catalytic oxidizer to be at a minimum of 700°F. During the malfunction, there was a loss of flame and the incinerator temperature was below the minimum temperature for over three hours.

The estimated hourly emissions during the loss of flame provided, showed levels of volatile organic compounds (VOCs) and formaldehyde at 1.22 lbs/hour and 0.07 lbs/hour, respectively. This exceeds the allowable emission limit of 0.87 lbs/hour VOC and 0.030 lbs/hour formaldehyde in PTI number 24-10A, SC I.1 and I.3 .

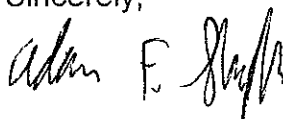
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Per your January 27, 2017 correspondence, steps were taken to correct the cited violations and a revised Malfunction Abatement Plan was submitted to the AQD. Based on this documentation, no further response is necessary at this time.

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

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my review of Harbison Walker International, Inc. 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 Shaffer
Environmental Quality Analyst
Air Quality Division
616-356-0767

cc: Mr. Jim Maile, Harbison Walker
Ms. Heidi Hollenbach, MDEQ
cc/via e-mail: Ms. Lynn Fiedler, MDEQ
Ms. Mary Ann Dolehanty, MDEQ
Mr. Chris Ethridge, MDEQ
Mr. Thomas Hess, MDEQ