



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

December 16, 2020

Mr. Mike Birkmeier
Harlo Corporation
4210 Ferry Street SW
Grandville, Michigan 49418

SRN: B8887, Kent County

Dear Mr. Birkmeier:

VIOLATION NOTICE

On November 23, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received requested records from Harlo Corporation located at 4210 Ferry Street SW, Grandville, Michigan. The purpose of this records request was to determine Harlo Corporation'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 141-04A.

During the records review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGFACILITY	PTI No. 141-04A, FGFACILITY, Special Condition (SC) 3.2	Failure to use manufacturer's formulation data to determine HAP content

Upon reviewing the records received from Harlo Corporation, it was identified that safety data sheets are being used to determine HAP content for several materials. This is a violation of PTI No. 141-04A, FGFACILITY, SC 3.2.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 6, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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Please submit the written response to EGLE, 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 EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Harlo Corporation 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 violation cited above and for the cooperation that was extended to me during our phone conversation and subsequent records request. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in cursive script that reads "Adam Shaffer".

Adam Shaffer
Environmental Quality Analyst
Air Quality Division
616-970-9077

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE