Introduction

On the above date, a comprehensive inspection was conducted at Ohio Electric Motors, Inc. The purpose of this inspection was to determine compliance under the Asheville-Buncombe Air Quality Agency Code (AB Air Quality Code). Ohio Electric Motors, Inc., otherwise known as the facility, specializes in manufacturing permanent magnet and wound field direct-current electric motors. Operation of this facility is granted under permit number 11-757-15 which was issued on September 8, 2015, and expires on September 30, 2023. The inspection was conducted by Alex Latta. The facility was represented by Stevie Brown. The following is a summary of the inspection results:

Safety Equipment/ Special Instructions

Safety glasses and steel-toed shoes, and safety vest are required while in the manufacturing area.

Permitted Equipment

- PSB-1: One (1) metal parts paint spray operation with overspray controlled by one (1) Paint Spray Booth equipped with dry filters.
  PSB-1 was observed in operation during the inspection.
- PSB-2: One (1) metal parts paint spray operation with overspray controlled by one (1)
  Paint Spray Booth equipped with dry filters.
  PSB-2 was observed, but not in operation during the inspection.
• W-1: Welding Operation, including spot welders and metal inert gas (MIG) welders

W-1 was observed in operation during the inspection. This unit has been modified where emissions from the operations are routed into a filter and according to facility representatives, the unit no longer vents outdoors.

Exempt Sources:

The following exempt equipment was observed during the inspection:

- One (1) Possis Corporation armature impregnating trickle oven
- One (1) 2.3 million BTU per hour Weil McLain No. 2 propane-fired boiler
- One (1) powder coating operation, including one (1) manual powder coat tank, two (2) Grieve electric curing ovens, and (1) Torit dust collector. The dust collector is not listed on the permit.
- Three (3) 1,000 gallon propane tanks. The permit lists two (2).
- Three (3) tanks used to clean or coat metal parts, including a detergent for aluminum parts, a cleaner/degreaser tank for steel and cast parts, and a rust preventative tank for the steel and cast parts
- One (1) Safety Kleen parts washer
- Various metal machining operations
- One (1) electrically heated mop water evaporation tank

The facility has removed the one (1) 10,000 gallon fuel oil tank

Permit Conditions:

The following permit conditions were reviewed during this inspection:

- A.1 – The facility is required to operate according to AB Air Quality Code including but not limited to the following specified conditions and any other applicable Local, State, and Federal regulations.
• A.2 – The facility is required to operate the processes and equipment consistent with the application they submitted for the permit.

• A.3 – The facility is required to submit an application for any changes or alterations to processes and equipment to AB Air Quality Agency. Failure to do so could result in enforcement action.

• A.4 – This condition requires the permittee to notify the Agency in the event of a name or ownership change.

• A.5 – This condition requires the facility to obtain a new air permit prior to installing and operating sources of air emissions at a site or location not specified in the permit (relocation).

• A.6 – This permit does not absolve the facility of any liabilities related to any civil/criminal penalties for violations of AB Air Quality Code prior to permit issuance. The facility shall be subject to enforcement action if the terms of the permit are violated.

• A.7 – This condition requires that the permittee maintain and operate the facility at all times so that the overall reduction in air pollutants, in accordance with applicable standards, is achieved. The facility has developed a maintenance schedule for equipment and is maintaining records of all maintenance. Additionally, the facility is maintaining an inventory of spare parts for equipment. The facility has established standard operating procedures for equipment and is training equipment operators on the procedures.

• A.8 – This condition requires that the facility notify the Agency in the event of a malfunction. The facility has not experienced any malfunctions during the reporting period.

• A.9 – This condition lists the Agency address that the facility is required to submit any required reports, data, notifications, and requests for renewal.

• A.10 – The facility shall allow authorized Local, State, and Federal representatives on-site for inspection upon presentation of credentials.
• A.11 – This condition requires that the facility pay their annual permit fee on a timely basis. The facility is up-to-date on fee payments. The facility last submitted their fee payment on October 6, 2022.

• A.12 – The facility is required to submit a permit renewal request no later than ninety (90) days prior to permit expiration. The facility’s request was received by the Agency on April 26, 2023.

• A.13 – This permit may be suspended or revoked by the AB Air Quality Agency Board under certain conditions.

• A.14 – This condition requires the facility retain a copy of the permit on the premises. The facility had a copy of their current operating permit on-site.

• B.1 – The previous issue of this permit shall become void with the issuance of this current version.

• B.2 – This condition states the facility shall be operated to prevent odorous emissions from being emitted beyond the boundary of the facility. The facility was not producing any odorous emissions during the inspection.

• B.3 – This condition establishes the facility’s particulate matter emission limit from PB-1 and PB-2. Provided the facility maintains the dry filters on the spray booths, it will be assumed these operations are in compliance with this regulation.

• B.4 – This condition states that equipment ID W-1 is subject to the requirements of 40 CFR 63 Subpart XXXXXX – “National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories”. The facility is meeting the management practices required by using a welding fume capture and control system for the welding operation. The facility is using less than 2000 pounds of welding wire annually. The facility used 244 pounds of welding wire in 2022. The facility is maintaining all records related to 40 CFR 63. According to historical records, the facility submitted their initial notification late resulting in a violation but no further recordkeeping violations have been noted in the last ten (10) years. The facility is not required to conduct visible emission inspections but maintains annual welding wire inspections.
usage. An annual certification of visible emission inspections is not required if welding wire usage is less than 2,000 lbs. The most recent annual report was submitted on February 14, 2023 with the annual report showing welding wire usage of 244 lbs.

- B.5 – This condition states that visible emissions shall not be more than 20% opacity. The facility did not exhibit an opacity during the inspection.

- B.6 – This condition states that the facility shall be operated in accordance with the AB Air Quality Code 4.0958 - “Work Practices for Sources of Volatile Organic Compounds” and lists the requirements of this rule. The facility is following all required VOC work practice standards including: keeping all VOC containing material in closed containers when not in use; cleaning spills as soon as possible; storing wiper rage in closed containers; storing all cleaning solvents in closed containers; and closing all mixing, blending, manufacturing vats when cleaning.

- B.7 – This condition states that the facility must submit annual reports to the Agency by February 15th of each year. The facility is submitting annual reports as required. The most recent annual report was submitted on February 14, 2023 and contained all the required information. The facility is not required to submit an annual compliance certification report because it does not meet the definition of an affected source in Part 63. The definition references facilities for which a standard has not been issued. Eaton uses less than 2,000 pounds of welding wire annually and as such, does not have to monitor visible emissions. The conditions were placed in the permit to cover the requirements if the production increased.

Compliance History:

The facility does have any history of recorded violations in the last ten (10) years. A notice of Violation was issued on December 14, 2011 for late submittal of the initial notification required under 40 CFR 63 subpart XXXXXX. No civil penalty was assessed for this violation.

Conclusion:

Based on the above information, Ohio Electric Motors, Inc. appears to be in compliance with all applicable regulations of the AB Air Quality Code. It is recommended that this permit be renewed.