Introduction

On the above date, a comprehensive inspection was conducted at Eaton Electrical. The purpose of this inspection was to determine compliance under the Asheville-Buncombe Air Quality Agency Code (AB Air Quality Code). Eaton Electrical, otherwise known as the facility, specializes in manufacturing a variety of industrial switches and electrical distribution equipment. Operation of this facility is granted under permit number 11-759-15 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 Bill Belardo. 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.

- VP-1: One (1) varnish impregnation process consisting of one (1) varnish storage tank, 
  one (1) pressurized dip tank, and two (2) 0.30 million BTU per hour natural gas-fired 
  cure ovens.

  VP-1 was observed in operation during the inspection.
• GEN-1: One (1) natural gas-fired emergency-use generator with a rated output capacity of 85 kW

GEN-1 was observed, but not in operation during the inspection. The current hour meter reading was 800.7 hours. This unit last ran on August 24, 2023 and runs weekly.

• GEN-2: One (1) natural gas-fired emergency-use generator with a rated output capacity of 600 kW

GEN-2 was observed, but not in operation during the inspection. The current hour meter reading was 1104 hours. This unit last ran on August 24, 2023 and runs weekly.

Exempt Sources:

The following exempt equipment was observed during the inspection:

• One (1) glastic material back-up cutting process with emissions controlled by one (1) Scientific Dust Collectors baghouse. This unit is rarely used and the facility may remove it in the near future. Currently the unit is still on-site.

• One (1) electrostatic dry powder coating process including one (1) 1.00 million BTU per hour natural gas-fired wash/rinse system, one (1) 2.00 million BTU per hour natural gas-fired dry-off oven, one (1) Colormax automated booth, one (1) RGM semi-automated booth, and two (2) 2.00 BTU per hour natural gas-fired cure oven. The permit lists one (1) cure oven for this process and facility representatives noted there are two associated with it.

• One (1) 0.60 million BTU per hour natural gas-fired cleaning furnace. According to facility representatives, this unit has been removed.

• One (1) plastisol dip coating process consisting of one (1) 0.50 million BTU per hour natural gas-fired preheat oven, one (1) dip tank, one (1) 0.50 million BTU per hour natural gas-fired cure oven

• One (1) Crystal Clean parts washer. The permit lists two (2) but the facility has removed one.

• Various metal machining operations
• One (1) wood saw used in the making of pallets
• One (1) laser cutting process used to cut metal and equipped with a metal dust collection system
• Various welding operations
• Approximately nine (9) natural-gas fired comfort heaters
• One (1) 2,000 gallon diesel fuel oil storage tank that provides fuel for GEN-2
• Various ink jet printing operations

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. The facility conducts bi-monthly filter changes on the paint spray booth as well as routine inspections. Additionally, the facility conducts semi-annual inspections of the dust collection systems for this unit. The varnish process receives monthly and annual inspections.

- **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 January 27, 2023.
- **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 June 27, 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 PSB-1. 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 visible emissions from PSB-1 shall not be more than 20% opacity. The facility did not exhibit an opacity during the inspection.

• B.5 – 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 wipe rage in closed containers; storing all cleaning solvents in closed containers; and closing all mixing, blending, manufacturing vats when cleaning.

• B.6 – This condition states that GEN-1 and GEN-2 are subject to 40 CFR 63 Subpart ZZZZ and lists the requirements for this rule. The facility is conducting inspections weekly on each unit which includes inspections of all belts, hoses, air cleaners, and spark plugs. Corrective action is initiated immediately upon noticing an issue. GEN-1 last received an oil change on March 6, 2023. The facility conducts oil analyses on GEN-2 in lieu of annual oil changes. Gen-2 was last serviced on April 14, 2023. The last oil analysis for GEN-2 was dated April 14, 2023 with no issues noted with the results. Fluids were not changed during this service. The facility appears to sample on a semiannual basis. Prior sampling events occurred on October 6, 2022, April 11, 2022, and October 8, 2021 for GEN-2. GEN-2 received filter changes during the October services according to the oil sampling report provided by Carolina CAT. At the time of the inspection, the hour meter reading for GEN-1 was 800.7 hours and GEN-2 was 1104 hours. The units were last run August 24, 2023 for testing and maintenance purposes. Additionally, the facility is maintaining records of oil changes and oil analyses, inspections, maintenance records, and hours of operation records for each unit.

• B.7 – This condition requires the facility to submit annual reports by February 15th. The facility is submitting annual reports as required. The most recent annual report was
submitted and received on February 15, 2023 and contained all the required information.

Compliance History:
The facility does have any history of recorded violations in the last ten (10) years.

Conclusion:
Based on the above information, Eaton Electrical appears to be in compliance with all applicable regulations of the AB Air Quality Code.

Signature: Alexander Faloje Date: 9/6/2023
Reviewer Signature: Date: 9/15/2023
Director Signature: Date: 9/18/2023