

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

N231534959

FACILITY: EAGLE TECHNOLOGIES GROUP		SRN / ID: N2315
LOCATION: 9850 RED ARROW HWY, BRIDGMAN		DISTRICT: Kalamazoo
CITY: BRIDGMAN		COUNTY: BERRIEN
CONTACT: Dan Kuntz , Manufacturing Manager		ACTIVITY DATE: 06/10/2016
STAFF: Matthew Deskins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced Scheduled Inspection		
RESOLVED COMPLAINTS:		

On June 10, 2016 AQD staff (Matt Deskins) went to conduct an unannounced scheduled inspection of the Eagle Technologies facility located in Bridgman, Berrien County. Eagle Technologies has an air use permit (PTI No. 841-89A) for a paint spray booth. The purpose of the inspection was to determine the facilities compliance with the permit as well as any other state or federal air regulations. Staff departed for the facility at approximately 9:20 a.m.

Staff arrived at the facility at approximately 10:45 a.m. Prior to entering the facility, staff noted the stack for the paint spray booth and observed it for several minutes. If the booth was in use, staff did not observe any visible emissions coming from it. Staff then proceeded to the reception/office area. Staff introduced them self to Peggy, the receptionist, and stated the purpose of the visit. Peggy told staff they probably needed to see Dan Kuntz (Mfg. Mgr.) so Peggy paged him. Dan came to greet staff several minutes later and staff again introduced them self and stated the purpose of the visit. Dan asked what staff would like to see? Staff said that they would like to see the facilities operations, check out the paint booth, and then review the records required by their permit. Staff then gave Dan their business card and a copy of the DEQ's Environmental Inspection Brochure. Prior to the plant walk through, staff asked some general questions about the facilities operations and if anything had changed since staff's last inspection in 2008. The following is a summary of what Dan told staff.

Eagle Technologies currently employs approximately 164 people and their business is still the same as it was back in 2008. Dan said that the company's main business is still manufacturing specialized automated equipment. Typically, a customer will have an idea in mind for a certain operating process that they need and Eagle Technologies will help design, build, test, and ultimately set-up the machine at the customer's work place. He mentioned that they recently have done work with Tesla and are working on a project with Stryker. He said that they do a lot of work for the automotive and pharmaceutical industries. Dan said although they fabricate most of their own parts on site, they do have to purchase some to integrate into the machine. Dan mentioned that business has been good, especially the last two years which has allowed them to hire more people. They are currently operating two 12 hour shifts Monday through Friday. He said that the 2<sup>nd</sup> shift is kind of small and mainly does machining work. Staff then reviewed the requirements of their PTI and the records required to be kept by it. The following lists the special conditions (SC) of PTI No. 841-89A and staff comments regarding them.

SC #15 – The VOC emission rate cannot exceed 6.7 pounds per hour nor 14 tons per year.

AQD Comment: Compliance. The permit does not contain any recordkeeping requirements for tracking compliance with this condition. Staff reviewed approximately two years of paint use records and noted that with the amount of paint used, the facility should be well below these limits.

SC #16 – There shall be no visible emissions from the paint spray booth operations.

AQD Comment: Compliance. The paint booth was not in operation while staff was present so no VEs would have been observed.

SC #17 – Paint use records shall be kept on file for at least 2 years.

AQD Comment: Compliance. The facility has records going back further than 2 years.

SC #18 – The facility cannot use more than 15 gallons of paint per day.

AQD Comment: Compliance. The records staff reviewed indicated the most paint use was at most 3 to 4 gallons in a day with a lot of the records indicating usage in the quarts per day.

SC #19 – The facility cannot operate the paint booth unless the fabric filters are in place and operating properly.

AQD Comment: Compliance. The booth was not in operation while staff was present but the filters were in place. Staff noted that they were pretty dirty to which Dan also agreed. He said he would make a note to have them changed out.

SC #20 – The disposal of the filters will be done in such a manner that minimizes the introduction of air contaminants to the outer air.

AQD Comment: Compliance. Staff will have to assume that disposal is being done properly.

After reviewing the above records and noting the facilities paint usage, staff mentioned to Dan that he may want to look to operate the booth under the AQD Rule 287(c) permit exemption and void out the permit. Staff mentioned that their paint usage appears to be well under 200 gallons per month and although they would still have to track paint usage to show compliance with the exemption, they wouldn't need the permit. Staff then showed Dan the exemption from our handbook and he made a copy of it. He asked what he needed to do to void out the permit and staff mentioned that he would need to send in a letter to us requesting that it be voided and that they planned to operate the booth under the Rule 287(c) permit exemption. Staff then proceeded with Dan out to the production area.

Once out in the production area, staff noted that the facility was very neat and clean. Staff noted CNC lathes, mills, drill presses, etc. for doing the metal working. These processes would appear to be exempt under Rule 285(l)(vi). Staff also noted other areas where they were assembling and/or testing the automated machines. Staff then proceeded with Dan to the paint booth area.

Once at the paint booth, Staff noted the booth wasn't currently in use but did have some painted parts hanging in it. Dan mentioned that Tim still does the painting at the facility and that they still farm out some to Cast Coatings in Galien, mainly for powder coating but some wet paint jobs as well. As mentioned earlier, the filters were in place but were pretty dirty and Dan mentioned he would have them changed out. Staff noted that the spray guns appeared to be HPLV. Staff then asked how much painting gets done and Dan stated it depends on the work load of course, but it is usually done every day of the work week and usually only on 1<sup>st</sup> shift. He said that they aren't painting the whole shift of course.

After the plant tour, staff thanked Dan for his time and departed the facility at approximately 11:50 a.m. The facility appears to be in COMPLIANCE with the conditions of PTI No. 841-89A and all other state and federal air regulations. The facility may look to void out the permit and operate the paint booth under the AQD Rule 287(c) permit exemption.

NAME Matt Darkin

DATE 6-14-16

SUPERVISOR MD 6/14/2016