

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

A190824646

FACILITY: EATON HYDRAULICS		SRN / ID: A1908
LOCATION: 2425 W MICHIGAN AVE, JACKSON		DISTRICT: Jackson
CITY: JACKSON		COUNTY: JACKSON
CONTACT: Kelsey K. Britton , Senior EHS Analyst		ACTIVITY DATE: 03/25/2014
STAFF: Sersena White	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced targeted inspection. One permit for seven cold cleaners subject to Rule 707. Follow-up on posting procedures and identifying if exemption could apply to some or all of the cold cleaners. Review records required for exempt spray paint booths.		
RESOLVED COMPLAINTS:		

SRN: A1908

Company Name: Eaton Hydraulics Group

Address: 2425 W. Michigan Avenue, Jackson, MI 49202

Company Contact: Kelsey K. Britton, Senior EHS Analysts

Company Contact E-mail address: [KelseyKBritton@Eaton.com](mailto:KelseyKBritton@Eaton.com)

Company Contact Phone Number(s): Work 517 789-1707 Mobile 248 770-6598

The purpose of this inspection was to determine compliance with air quality rules, regulations and permits.

Eaton Hydraulics is a manufacturer of hydraulic and pneumatic cylinders and servo valves for industrial, commercial and mobile hydraulics systems.

Personal protection equipment: Safety glasses with side shields, steel toed shoes/boots, and visitors must wear a Hi-visibility vest

The last inspection was conducted by Mike Maillard on September 9, 2010 with the compliance status pending. The pending status is based on failure to submit a Rule 208(a) renewal registration. On April 2, 2012 in follow-up by Sersena White, with the company, it was determined that Eaton Hydraulics is a true minor source based upon emissions reported in MAERS between 2008 and 2010 being less than 10 tons per year. The company was asked to submit a potential to emit calculation demonstration to show true minor status for VOCs and HAPs and eliminate the requirement for Rule 208a status. The potential to emit demonstration was received via e-mail on April 16, 2012, showing that all pollutants are well below the major source thresholds. I e-mailed this information to Kelsey on April 14, 2014 for historical proof to support compliance with Rule 208a.

I arrived at approximately 9:10 a.m. and phoned HR to introduce myself and my purpose for being there. I explained that the last person contacted was Mike McDermott. Lindsey Budnick of HR informed that he no longer works there and she would find who I would need to see. At approximately 9:20 a.m. Kelsey Britton met me in the lobby, I introduced myself and we went to an empty office to discuss the inspection. I gave her one of my business cards and explained that I was there to conduct an air quality inspection. The inspection will include identifying compliance with the permitted cold cleaners and any exempt emission units that are on site. I explained that an inventory of stacks would assist us in making this evaluation. I gave her an Inspection Rights and Responsibility brochure as I began explaining the approach for the inspection today and pointed out the survey link on the back. Barry J. Price, the Plant Manager, was introduced prior to beginning the inspection and offered any assistance that might be needed during the inspection.

This is her first Air Quality inspection, so we discussed some of the regulatory history of the plant before going over the requirements of permit 648-90 for the seven cold cleaners. Rule 707 is cited in the permit, so I shared a copy of it and we went over those requirements. From the previous inspection, it was noted that there are spray paint booths operating under Rule 287(c), so I share the exemption requirements with her from the Permit to Install Exemption Handbook. She made a copy of the last inspection report so that we could use it as a guide as we conducted the inspection today. Mr. Price said that Kelsey had recently put labels on all of the cold cleaners and that one of them is scheduled to be removed today.

All except one of the cold cleaners exhaust indoors. All except one of these cold cleaners are maintained by Safety Kleen and use Kwik Dry as the solution for cleaning. As we inspected each cold cleaner all of the lids were closed except for the Vickers Branson labeled as ZAP Tank #1 that is equipped with a fan that exhaust outside. This cold cleaner is used frequently and the cover is not usually replaced after every use. It is located in

an enclosed area and the exhaust fan is always on according to the operator. The cold cleaner has a switch for heat that is in the off position. I asked if the heat was used for this cold cleaner and the operator said that the heater is broken. This cold cleaner has the Kwik Dry 66 solution changed out once per month. This is performed manually by the operator who stores the waste in a container. It was also observed that this cold cleaner did not have instructions/procedures posted. All of the other cold cleaners did have procedures posted only when the cover was open. I suggested that procedures be posted so they could be observed before opening the cover for all of the cold cleaners.

I followed up with Kelsey regarding the posting of instructions on use of the cold cleaners and in providing records for the paint booths. Kelsey provided color photos of each of the cold cleaners with posted instructions, and improved record keeping for the paint booths.

Based upon the observations and review of information, Eaton Hydraulics is complying with the requirements of the permit and the exemptions.

Attachments

NAME *Kelsey Miller* DATE *4-15-2014* SUPERVISOR *[Signature]*