

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

B041759454

FACILITY: Eaton Aerospace LLC		SRN / ID: B0417
LOCATION: 3675 Patterson Ave SE, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Anna Horvath , EHS Manager		ACTIVITY DATE: 08/19/2021
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection. No odors or visible emissions were noted. I met with Eaton Aerospace (Eaton) staff, and learned that Anna Horvath, Safety and Environmental was on vacation. I presented my official state identification, and my driver's license was requested. I declined to provide my driver's license. I met with Joshua Black and was instructed to watch the safety video, while they ran a background check to ensure that I was cleared to enter a facility regulated by the federal government. Following the background check, I was escorted inside by Mr. Black and Joel Johnson.

FACILITY DESCRIPTION

Eaton Aerospace is involved in the design, manufacturing and refurbishment of military and commercial of electromechanical actuators & secondary flight control systems. This facility has not been inspected in recent years. I found the facility had an active Permit to Install No. 535-81 for a chemical conversion coating and passivation line with a wet scrubber for control. Upon my arrival I discussed this PTI with Eaton staff and learned that the process tanks have been completely removed and the space has been repurposed. The scrubber still exists but is not operational.

COMPLIANCE EVALUATION

The facility is separated into areas referred to as Buildings 1-5.

The space previously used for the permitted equipment is now used for sealant application. I observed the usage log on the wall, which indicates compliance with the Rule 287(2)(c) exemption.

I observed a washroom containing a Safety Kleen parts washer, and the lid was down as required. The Safety Kleen parts washer is exempt from permitting pursuant to Rule 281(2)(h). I also observed a soap based parts washing system that is externally vented. The soap based parts washing system is exempt from permitting pursuant to Rule 285(2)(l)(iii). The liquids from the wash cycle are reclaimed and ran through an evaporator. The evaporator has a 55 gallon drum to collect waste solids. Eaton has stated there are no air emissions, and as such it does not appear as though Rule 201 applies to the evaporator.

Eaton utilizes a Crest Ultrasonic vapor degreaser with refrigerated ring that utilizes a product manufactured by 3M named Novec 71DE Engineered Fluid. This device is internally vented, and the product is not a regulated halogenated solvent. This device is internally vented, and the product is not a regulated halogenated solvent. Upon request, Eaton provided documentation that included a one-time

demonstration of compliance with Rule 290. Potential monthly emissions from the vapor degreaser are 91.5 pounds. Based on the documentation provided, the vapor degreaser appears exempt from permitting pursuant to Rule 290.

During research of the product used, I found a Scope of the Risk Evaluation for trans -1,2-Dichloroethylene, CAS # 156-60-5 which is the main ingredient in the degreasing solvent. This document was provided to the facility for their review.

This building also contains a small (~4'x2') electric oven used to pre-heat parts to a low temperature, prior to adding a sealant for adhesion purposes. This oven is exempt from permitting pursuant to Rule 282(2)(a)(i).

Eaton operates a paint booth with 2 bays and one shared stack. I observed the paint log maintained in the area. Usage is typically in ounces. The paint is applied using HVLP technology and the filter is changed based on the pressure drop of the booth. This paint booth appears exempt from permitting pursuant to Rule 287(2)(c).

Building 4.5 contains a sealant room for small amounts of paint application. Usage is typically in ounces. The paint log was observed. This sealant application appears exempt from permitting pursuant to Rule 287(2)(c). The room also has a minimizer for solvent distillation. This unit has ~1 gallon batch capacity and appears exempt from permitting pursuant to Rule 285(2)(u).

Building 5 utilizes a Crest Ultrasonic vapor degreaser with refrigerated ring that utilizes a product manufactured by 3M named Novec 71DE Engineered Fluid. This device is internally vented, and the product is not a regulated halogenated solvent. Upon request, Eaton provided documentation that included a one-time demonstration of compliance with Rule 290. Potential monthly emissions from the vapor degreaser are 91.5 pounds. Based on the documentation provided, the vapor degreaser appears exempt from permitting pursuant to Rule 290.

Finally, we observed the area where the non-operational scrubber is located on the outside of the building. Mr. Johnson showed how the unit was inoperable, but due to the location it is difficult to dismantle and remove.

I sent a records request to Anna Horvath, EHS Manager upon her return. Information was received timely, and a review corroborated the permit exemptions identified above. Records are attached.

SUMMARY

Eaton Aerospace was in compliance at the time of the inspection.

NAME April Lazzaro

DATE 09/21/2021

SUPERVISOR HH