

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

B220958538

FACILITY: Eaton Corporation - Galesburg Campus		SRN / ID: B2209
LOCATION: 13100 E MICHIGAN AVE, GALESBURG		DISTRICT: Kalamazoo
CITY: GALESBURG		COUNTY: KALAMAZOO
CONTACT: Joe Hendges , EHS		ACTIVITY DATE: 06/07/2021
STAFF: Monica Brothers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Announced, Scheduled, On-site Inspection		
RESOLVED COMPLAINTS:		

This was an announced, scheduled inspection. Eaton Corporation is a research and development facility for large truck transmissions. They have fourteen test cells for this purpose, three diesel powered engines and eleven electric units with dynamometers. They commenced operations at this facility sometime back in the 1970's or 1980's and are currently operating under PTI #323-97A. They are an opt-out source for HAPs and NOx.

Staff, Monica Brothers, arrived at the facility at about 10:30am and met with Joe Hendges, Lead EHS Analyst. We first sat down in a conference room to go over some recordkeeping and questions I had about the facility, before conducting the walk-through inspection. Eric Smith, Facilities Manager, also joined us. Eaton has about 330 employees, who work one shift per day, Monday through Friday. The test cells are automated and can run unattended, 24-hours/day if the test requires it. They still have the same five boilers that they have had since 2008, along with the same three natural gas emergency generators, and same two cold cleaners. They also have a 208kw fire pump that was installed in 1981 and gets readiness tested for two hours per month. After my initial discussion with Joe and Eric, we took a tour of the facility.

#### Tour:

**Test Cells:** Cell 2 is the newest diesel-fired unit at the facility. It was manufactured on 1/5/2015 and is an MX 13 liter, 385HP engine with an on-board after-treatment. This is considered a heavy-duty engine, along with engine 7. Test Cell 7 is a Cummins ISX 485HP diesel unit, Test Cell 8 is a Cummins ISC 330HP unit that is considered a medium-duty engine, and Test Cell 6 is an electric unit that does inertia break performance testing and pump durability testing. Test Cell 9 is no longer in operation. The diesel engines use ultra-low diesel fuel, which is stored in a 15,000 gallon above ground storage tank with external secondary containment.

**Boilers:** There are three boilers in the west building. They service the west building and the "connector" building in between the E and W buildings. The west building contains all of the test cells, and the east building contains the offices and call center. They are all Cleaver Brooks, natural gas-fired, 1750MBH units. The model is CFC and the serial numbers are MB 1434, MB 1435, and MB 1537. The two boilers in the east building are Cleaver Brooks, natural gas-fired, 1000MBH units. The model is CFC and the serial numbers are MB1432 and MB 1433. These five boilers, combined, are under 50 MMBTU/hr, so they are considered exempt from permitting under Rule 282(b).

**Emergency Generators:** They have three natural gas emergency generators. One is a 47kw Cummins, located in the west building. It was installed in 1998, and the hour meter read 556.0 hours. The model is GGFE-5563461 and the serial number is F020383839. There is another in the

east building. It is a 208-volt Onan that was installed around 1980. The hour meter read 514 hours. The model is LTA-5620229, and the serial number is D030495622. The last generator is outside. It is a 150kw raised-floor Cummins unit, built on 12/13/05. The model is GGLB-5743378, and the serial number is K050855188. We were unable to read the hours meter at the time of inspection, but they are keeping a log of the hours, multiple times per month. All of these units are considered "existing" units under the requirements of 40 CFR Part 63, Subpart ZZZZ and are maintained by Cummins.


**Parts-Washers:** There are two parts-washers at the facility. One is in the assembly area and the other is in the east building in the shipping and receiving area. Both are Safety Kleen units that had the lid closed and the rules posted. Both units are serviced by Safety Kleen and the solvent gets recycled. The solvent used in both units is Safety-Kleen Premium Solvent (Virgin and Recycled), which is 100% VOC by weight. An MSDS was obtained.

Recordkeeping: PTI #323-97A

**FG-TESTCELLS:** They have a NOx limit of 97 TPY on a 12-month rolling timescale. They are keeping these calculations and are under this limit, with 31.16 TPY in April 2019 being the highest value in the past three years. They are keeping track of the operating hours of each test cell and the NOx emissions for each test cell separately.

**FG-ALLSOURCES:** They have a NOx limit of 99 TPY on a 12-month rolling timescale. They are keeping records for this and are consistently under this limit, with 31.59 tpy in April 2019 being the highest value in the past three years. They also have a limit of 9 TPY on a 12-month rolling timescale for each individual HAP. They are keeping these records and are consistently under this limit, with about 4 tpy for ammonia and acetaldehyde being the highest value within the past three years. They also have a limit of 22.5 TPY on a 12-month rolling timescale, for all combined HAPs, and their records show that they are consistently under this limit.

The facility seemed to be in compliance at the time of inspection.

NAME 

DATE 8/24/21

SUPERVISOR RIL 8/30/21