

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

N777236049

FACILITY: EDGEWATER AUTOMATION LLC		SRN / ID: N7772
LOCATION: 481 RENAISSANCE DR, SAINT JOSEPH		DISTRICT: Kalamazoo
CITY: SAINT JOSEPH		COUNTY: BERRIEN
CONTACT: Tim Tate, Director of Manufacturing		ACTIVITY DATE: 08/11/2016
STAFF: Monica Brothers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced scheduled inspection		
RESOLVED COMPLAINTS:		

This was an unannounced scheduled inspection. Edgewater Automation LLC is a minor source facility that designs and builds custom automation equipment. They make a variety of assembly systems, test systems, and material handling systems that are all engineered and built at this location. They commenced operations in 2001, and are currently operating under PTI #80-07.

Staff (Monica Brothers and Matt Deskins) arrived at the facility at about 10:40am and introduced ourselves to the receptionist. During the last inspection in 2008, staff met with Mr. Steve Harder, so we asked the receptionist if he was available to conduct an air quality inspection with us. She then called him and let him know that we were there, and he came to meet us a few minutes later. He mentioned that he was actually no longer working as the Manufacturing Manager, and that Tim Tate had taken his place in 2006. He said that he would have Tim meet us as soon as he was out of a meeting, but that he could sit down with us and get the inspection process started by answering some initial questions. He then led us to a conference room where we gave him our business cards and an inspection brochure.

We briefly explained the inspection process and the types of records we would want to see after the facility tour. Steve said that they now have about 74 employees who work one shift per day, 6:00am-5:30pm, Monday through Friday, with some Saturdays when needed. Since the last inspection in 2008, they have physically expanded the facility, mostly for storage purposes, and business has been pretty steady. Approximately 70% of what they produce is for the automotive industry, but they also make some products for Whirlpool, pharmacies, and about 30 other companies. Steve said that they only paint about 5% of what they make, and the majority of the painted items include, tooling plates, electrical boxes, and weldments. We asked Steve if the facility had any emergency generators or boilers, and he said that it did not. He also mentioned that the cold cleaner they used to have is now gone.

Steve then explained that they do their painting by the custom requirements of each customer. So, each customer specifies what kind of paint they want, and then they will purchase the quantity of that paint needed for the job. Leftover paint will sometimes get sent back to the customer, so they can use it for touch-ups. Otherwise, they will keep the paint for future jobs. Steve said that while they are still using mostly 2-part polyurethane enamel paints, they are currently experimenting with water-based paints and would like to eventually be able to completely switch over to using all water-based paints in the future.

After our initial discussion with Steve, we took a tour of the facility. As Steve led us out onto the production floor, we met Tim. Steve introduced us and asked Tim to give us a tour and show us the records for the paint booth. We thanked Steve for his time and then began the tour with Tim upstairs in their engineering office. This space is used only for cubicles for engineers and system designers. Tim then took us to a viewing platform where we could see the general layout of the whole facility. He explained the building expansions that had recently occurred and showed us various storage areas. Tim walked us over to the area where some customer products were in the final stages of development, so we could see the types of machines the company builds. We then made our way toward the back of the facility where the paint booth is located.

The paint booth is a completely-enclosed and separate room from the rest of the facility. It had a manometer on the side to measure pressure, but since the booth was not in use and the fans were not on, we did not take a reading at the time of the inspection. There were some square filters on the front doors of the unit, and another set of larger filters at the back of the unit. The filters on the doors looked to be fairly clean, but the back filters were dirtier and needed to be changed soon. All filters seemed to be installed properly. Tim also showed us the HVLP spray guns that they use in the unit, which is a requirement in their general permit. Tim then introduced us to Rob Scheff who does most of the painting. He said that they usually change the filters about once per week, or as needed depending on

the workload. He showed us the sheets where he records the paint usage, the VOC contents of each coating, and the monthly summations for their VOC emissions. We did not see any open containers of coatings or solvents in the facility. We thanked Rob for his time, and then Tim showed us some more storage areas, as well as areas where they do machining with CNC machines. There is also a small self-contained sand blasting unit that vents internally. These metalworking and sand blasting processes can be considered exempt under Rule 285(l)(vi)(B).

After the tour, Tim showed us back to the conference room to go through their records. They had the monthly records of purchase orders, usage of coatings and reducers, and the VOC content of each material, along with each MSDS. They also had disposal records from Safety-Kleen, which they use mostly to haul away their coolant from the CNC machines. However, they did not have values for letters H and J on their VOC Emissions Calculations for 10 TPY Coating Line sheet (Appendix B in PTI #80-07). Therefore, they have not been calculating the 12-month rolling calculation for VOC emissions. They have all of the information they need to quickly do this for each sheet, but they just haven't been finishing out the worksheet each month. It is, however, very clear that they are far under their required 10 TPY limit, so no VN will be sent for this at this time. We let Tim know that it is very important to fill out the sheets completely, and he said that he would make sure that employees did this in the future. We thanked Tim for his time and left the facility at 12:30pm. Edgewater Automation seemed to be in compliance at the time of this inspection.

NAME *Maria Korte*DATE *8/22/16*SUPERVISOR *MA 8/22/2016*