

Asheville-Buncombe Air Quality Agency Facility Inspection Report

Facility Inspection Information					
Facility Name:	Perfection Gear, Inc.				
Date of Inspection:	July 20, 2023		Last Inspected:	July 7, 2021	
Mailing Address:	9 North Bear Creek Rd., Asheville, NC 28806		Physical Location:	9 North Bear Creek Rd., Asheville, NC 28806	
Contact Name:	Elaine Garber			Phone Number:	828-253-0000 Ext 119 (Office)
Permit #:	11-758-15A	Issued:	September 8, 2015	Expires:	September 30, 2023
Inspector(s):	Alexander (Alex) Latta				
Results:	Appears in compliance			Inspection Time:	0853 hours

Introduction

On the above date, a comprehensive inspection was conducted at Perfection Gear, Inc. The purpose of this inspection was to determine compliance under the Asheville-Buncombe Air Quality Agency Air Quality Code (AB Air Quality Code). Perfection Gear, Inc., otherwise known as the facility, specializes in manufacturing gear boxes and winches including machining, assembly, and painting of parts. Operation of this facility is granted under permit number 11-758-15A which was issued on September 8, 2015, amended May 9, 2016 and expires on September 30, 2023. The inspection was conducted by Alex Latta. The facility was represented by Elaine Garber. The following is a summary of the inspection results:

Safety Equipment / Special Instructions

Safety glasses and steel-toed shoes are required while in the manufacturing area.

Permitted Equipment

- PSB-2: One (1) metal parts paint spray operation with overspray controlled by one (1) Paint Spray Booth equipped with dry filters and one (1) bake oven with one (1) 1,000,000 Btu/hour natural gas-fired burner.

PSB-2 was observed in operation during the inspection.

Exempt Sources:

The following exempt equipment was observed during the inspection:

- One Safety Kleen Model 30 Parts Washer
- One 4 station parts cleaning process
- One Equipment Manufacturing Corporation water evaporator system fueled by natural gas with a maximum heat input rating of 0.2 million Btu/hr
- One Safety Kleen Model 81.8 Aqueous Agitating Parts Washer

It should be noted that the water evaporation system is not currently in use by the facility. It currently resides on site, but the facility has no current plan to return the unit to service.

Permit Conditions:

The following permit conditions were reviewed during this inspection:

- A.1 – The facility is required to operate according to AB Air Quality Code including but not limited to the following specified conditions and any other applicable Local, State, and Federal regulations.
- A.2 – The facility is required to operate the processes and equipment consistent with the application they submitted for the permit.
- A.3 – The facility is required to submit an application for any changes or alterations to processes and equipment to AB Air Quality Agency. Failure to do so could result in enforcement action.
- A.4 – This condition requires the permittee to notify the Agency in the event of a name or ownership change.
- A.5 – This condition requires the facility to obtain a new air permit prior to installing and operating sources of air emissions at a site or location not specified in the permit (relocation).
- A.6 – This permit does not absolve the facility of any liabilities related to any civil/criminal penalties for violations of AB Air Quality Code prior to permit issuance. The facility shall be subject to enforcement action if the terms of the permit are violated.

- A.7 – This condition requires that the permittee maintain and operate the facility at all times so that the overall reduction in air pollutants, in accordance with applicable standards, is achieved. The facility has developed a maintenance schedule for equipment and is maintaining records of all maintenance. Additionally, the facility is maintaining an inventory of spare parts for equipment. The facility has established standard operating procedures for equipment and is training equipment operators on the procedures.
- A.8 – This condition requires that the facility notify the Agency in the event of a malfunction. The facility has not experienced any malfunctions during the reporting period.
- A.9 – This condition lists the Agency address that the facility is required to submit any required reports, data, notifications, and requests for renewal.
- A.10 – The facility shall allow authorized Local, State, and Federal representatives on-site for inspection upon presentation of credentials.
- A.11 – This condition requires that the facility pay their annual permit fee on a timely basis. The facility is up-to-date on fee payments. The facility last submitted their fee payment on March 28, 2023.
- A.12 – The facility is required to submit a permit renewal request no later than ninety (90) days prior to permit expiration. The facility's renewal request was due by June 30, 2023. A Notice of Deficiency was issued on July 11, 2023 requesting the submittal of a permit renewal request by August 1st. The facility's request was received by the Agency on July 20, 2023 via email.
- A.13 – This permit may be suspended or revoked by the AB Air Quality Agency Board under certain conditions.
- A.14 – This condition requires the facility retain a copy of the permit on the premises. The facility had a copy of their current operating permit on-site.
- B.1 – The previous issue of this permit shall become void with the issuance of this current version.

- B.2 – This condition states the facility shall be operated to prevent odorous emissions from being emitted beyond the boundary of the facility. The facility was not producing any odorous emissions during the inspection.
- B.3 – This condition establishes the facility’s particulate matter emission limit from the paint spray booth. Provided the facility maintains the dry filters on the spray booths, it will be assumed these operations are in compliance with this regulation.
- B.4 – This condition limits the facility’s opacity to no more than 20% over a 6-minute average. During the inspection, the facility did not exhibit an opacity from the paint booth.
- B.5 – This condition states that the facility has triggered an air toxics review and have been found to be in compliance with AB Air Quality Code 17.0700.
- B.6 – This condition states that the facility shall be operated in accordance with the AB Air Quality Code 4.0958 - “Work Practices for Sources of Volatile Organic Compounds” and lists the requirements of this rule. The facility is following all required VOC work practice standards including: keeping all VOC containing material in closed containers when not in use; cleaning spills as soon as possible; storing wipe rags in closed containers; storing all cleaning solvents in closed containers; and closing all mixing, blending, manufacturing vats when cleaning.
- B.7 – This condition states that the facility must submit annual reports to the Agency by February 15th of each year. The facility is submitting annual reports as required. The most recent annual report was received on February 6, 2023 and contained all the required information. For 2022, the facility used 816 gallons of Bradley/United Paint Epoxy PC Black Base; 204 gallons of Bradley/United Paint Epoxy Plus Catalyst; 660 gallons of Safety Kleen Lacquer Thinner; and 120 gallons of Sherwin Williams Flat Black Enamel.

Compliance History:

The facility was issued a Notice of Deficiency on June 14, 2021 for a late submittal of their annual report for 2021 which was due on February 15th and received on February 21st.

As stated above, A Notice of Deficiency was issued on July 11, 2023 for not submitting a permit renewal request by July 2nd, 2023. The Agency requested the submittal of a permit renewal request by August 1st. The facility's request was received by the Agency on July 20, 2023 via email.

Conclusion:

Based on the above information, Perfection Gear, Inc. appears to be in compliance with all applicable regulations of the AB Air Quality Code. It is recommended that this permit be renewed.

Signature:	<u>Alexander Latta</u>	Date:	<u>8/1/2023</u>
Reviewer Signature:	<u>J C L</u>	Date:	<u>9/15/2023</u>
Director Signature:	<u>BW</u>	Date:	<u>9/18/2023</u>