



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

October 10, 2017

Mr. Robert Meacham
Textron CWC Division
1085 West Sherman Boulevard
Muskegon, Michigan 49441

SRN: B1909, Muskegon County

Dear Mr. Meacham:

VIOLATION NOTICE

On September 11 and 12, 2017, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of Textron CWC Division located at 1085 West Sherman Boulevard, Muskegon, Michigan. The purpose of this inspection was to determine Textron CWC Division's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of the facility's Renewable Operating Permit (ROP) No. MI-ROP-B1909-2013a.

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|---------------------|--|--|
| Cupola Furnace | ROP No. MI-ROP-B1909-2013a, FG-MACT-ZZZZZ, Special Condition V.2 | Failure to conduct subsequent performance testing within the five-year deadline. Testing was conducted late. |

Textron CWC Division conducted performance testing on September 12, 2017, to demonstrate compliance with the emission limits for the cupola furnace. In accordance with 40 CFR Part 63, Subpart ZZZZZ, Iron and Steel Foundry Area Source NESHAP, performance testing is required to be conducted no less than every five years. AQD records showed that performance testing was previously conducted on August 7, 2012. Therefore, the latest performance test was conducted past the five-year deadline.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 30, 2017. The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been

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taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a recurrence.

If Textron CWC Division believes the above observations or statements are inaccurate or do not constitute a violation of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of Textron CWC Division. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Eric Grinstern
Environmental Quality Specialist
Air Quality Division
616-356-0266

cc: Ms. Heidi Hollenbach, DEQ
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ