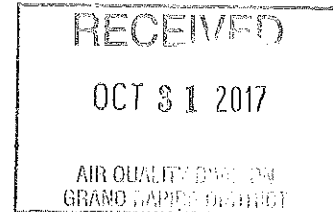


CWC TEXTRON 1085 W. Sherman Blvd., Muskegon, MI 49441

CWC TEXTRON
Robert R. Meacham
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October 27, 2017

Mr. Eric Grinstern
Senior Environmental Quality Analyst
Air Quality Division
Michigan Department of Environmental Quality
State Office Building
350 Ottawa NW – Unit 10
Grand Rapids, MI 49503



Re: October 10, 2017 Violation Notice – Conducting MACT -ZZZZZ subsequent performance testing past the 5-year deadline.

Dear Mr. Grinstern:

In response to your October 10, 2017 Violation Notice, sent to CWC Textron located at 1085 West Sherman Blvd, Muskegon, Michigan CWC would like to submit the following written response:

Dates of Violation: August 8, 2017 to September 11, 2017.

Explanation of the causes for the violation: The violation was not done willfully, in-fact the air stack testing Purchase Order authorizing the work with Network Environmental was created on June 8, 2017. There was no need to expedite noted because the Title V air permit doesn't expire until June 24, 2018, and the air stack testing window for renewal is from June 24, 2016 to December 24, 2017. Network Environmental and CWC Textron agreed that the September 12 date worked best for Network Environmental' s testing schedule, as the perceived and stated dates in MI-ROP-B1909-2013a were for testing to be completed by December 2017. There is no date listed in section FG-MACT-ZZZZZ for a test date other than every 5 years.

The violation is not ongoing, stack testing was conducted on September 12, 2017 and results received on October 26, 2017 show there is no exceedance of any emission standards.

Summary of actions taken: Stack testing was conducted on September 12, 2017 and results received on October 26, 2017 show there is no exceedance of any emission standards.

Date by which actions will take place: Stack testing was conducted on September 12, 2017 and results received on October 26, 2017 show there is no exceedance of any emission standards.

Steps to prevent a reoccurrence: CWC Textron is proposing to put language into our 2018 permit renewal application that will specifically list out in the new permit the date the stack testing for FG-MACT-ZZZZZ will be completed is between January 1, 2022 and September 12, 2022, and the stack testing for the other components of the Title V permit renewal also would be completed between January 1, 2022 and September 12, 2022.

CWC Textron believes that the current Title V air permit MI-ROP-B1909-2013a was ambiguously written and did not make the testing date of the statute stand out apart from the testing date tied into the renewal of the Title V air permit that doesn't expire until June 24, 2018. A section of the permit with a vague 5-year (from what date or test?) testing requirement should not be a violation when the permit it is contained in has not expired.

CWC Textron would also like to note that at no time between August 7, 2012 and August 7, 2017 and between August 8, 2017 and September 12, 2017 did we violate any air emission requirements of our permit as the testing results from the September 12, 2017 show all results below the MACT requirements of 0.8 pounds per ton of metal charged for PM, and 0.06 pounds per ton of metal charged for HAP Metals.

CWC Textron has and always will strive to be an environmentally responsible company (A Michigan C3 Designated facility) and looks forward to resolving this non-emissions issue with the MDEQ. Please contact me anytime at 231-739-2794 to discuss this issue or for any clarifications about information contained within this response letter.

Sincerely,



Robert R. Meacham – CSP, CHMM
Manager of EHS

cc/via e-mail: Mr. Jamison Schiff, Textron
Mr. David McCabe, Textron
Mr. Erik Jepsen, CWC