



Eaton Corporation
13100 E. Michigan Ave
Galesburg, Michigan, 49053
(269) 342-3000

January 20, 2017

VIA Email

Michigan Department of Environmental Quality
Kalamazoo District Office
Air Quality Division
7953 Adobe Road
Kalamazoo, MI 49009-5026

**Re: Eaton Corporation (Eaton)
13100 East Michigan Avenue
Galesburg, MI 49053
Michigan DEQ Violation Notice Dated December 27, 2016 (NOV)
Permit No. 323-97A**

Dear Ms. Brothers,

This letter responds to the above-referenced NOV, which Eaton received on January 09, 2017. Eaton appreciates this opportunity to respond. As is more detailed below, Eaton has taken several proactive measures regarding enhancements to its recordkeeping processes that we believe will address the agency's concerns. Separately, we believe that the agency has a misimpression with respect to our facility's boilers which are exempt from state emissions permitting requirements.

Taking first the agency's comments (Comment 1) with respect to 12-month rolling NOx and HAP emissions records associated with our test cells:

- We have reviewed our records for the past 24-months – specifically records from 01 January 2015 to 31 December, 2016. While we have been providing the agency with fully complete emission records covering that relevant time period, our MAERS report was month-based vs. including the 12-month rolling look-back. As such we've implemented changes in our MAERS reporting on the go forward to ensure that full look-back is shown in one place.

- Notwithstanding the above, please note that during this entire period, the facility met all applicable NOx and HAP emissions limits as specified in our permit. Specifically, our reported emissions were NOx(42.703 tons), HAP(0.173 tons) as compared to authorized limits of NOX(97 tons), HAP(22.5 tons) so only small percent of our emissions allowance were used.
- In addition, we have taken another look at the reported emissions and believe we have been overly conservative, reporting potentials. Looking at our purchase records confirms that actual fuel usage during this time period were 30,000 gallons, as compared to potential of 230,652 gallons. Going forward we will be reporting on this basis which gives a more representative actuals figure.

With respect to our boilers, please note that Eaton has and continues to understand that those units are exempt from emissions permit requirements. Indeed, they are not listed in our permit as an emissions source and we believe the NOV is in error in this regard. Specifically the relevant equipment consists of fuel-burning equipment (i.e. boilers) and is used for purposes of heating and burns natural gas fuels. Therefore, we have concluded that these sources are exempt from permitting requirements pursuant to Rule 336.1282(b). As such, Eaton believes there are no violations with respect to the boilers as alleged in the NOV.

We appreciate the agency's consideration of the above and are happy to further discuss. If you have any questions, please contact me at your earliest convenience at 269-342-3455.

Thank you.

Sincerely,



Michael A. Galloway
Senior Engineering Manager

cc: Jessica Bothell
Lisa Sutton
Steve Fesko