

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

CWC TEXTRON
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March 20, 2023

EGLE-AQD
Grand Rapids District Office
Mr. Eric Grinstern
Senior Environmental Quality Analyst
State Office Building
350 Ottawa NW – Unit 10
Grand Rapids, MI 49503

Re: March 14, 2023, Violation Notice – Conducting ZZZZZ and EU-WEST-CUPOLA subsequent performance testing past the 5-year deadline.

Dear Mr. Grinstern:

In response to your March 14, 2023, Violation Notice, sent to CWC Textron located at 1085 West Sherman Blvd, Muskegon, Michigan CWC would like to submit the following written response:

Date of Violation: September 12, 2022 – April 10, 2023

The violation was not done willfully. There was no perceived need to conduct stack testing before our scheduled date of April 11, 2023, because the Title V air permit does not expire until January 22, 2024, and the air stack testing window for renewal is from July 22, 2022, to July 22, 2023. The requirement of subpart FG-MACT-ZZZZZ stack testing and our other permit requirements for stack testing at one time in the past were conducted at the same time but now the requirements for Subpart ZZZZZ and the permit renewal submittal are growing further apart from each other every permit renewal cycle. Currently there is 15 months separation between the two requirements and further separation is likely after this next renewal.

There is no actual date listed in section FG-MACT-ZZZZZ (also located within the air permit that expires on January 22, 2024) as being September 11, 2022, it only states "every 5 years", this is very vague as it makes two different dates applicable to the air permit, the subpart ZZZZZ date and the other stack testing and permit renewal date of July 22, 2023.

Stack testing is expensive and difficult for CWC Textron to complete (our process often does not run for a full hour at a time as required by the 1 hour testing protocol), and as such we try to accommodate both the air permit renewal testing requirements and the ZZZZZ testing at the same time to prevent the need for scheduling two testing times and paying two setup fees. Our other stack testing that is required to be completed before the permit application is due on July 22, 2023 for EU-POURING will also be done on April 12-18, 2023 so the testing results can be submitted with the permit renewal by July 22, 2023.

CWC Textron has spent considerable time and over \$125,000 making improvements to our emissions systems (new water flow meters, new demister pads, repairs to stack burners and a new oxygen injection system) over the last two years and our Cupola stack has never looked better. We have gone over 4 years without any complaints about our Cupola emission system and our last stack testing on September 12, 2017 indicated that we did not violate any air emission requirements of our permit and all results were below the Area 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 missed the reporting deadline and will be conducting stack testing on April 11, 2023. CWC Textron will also be putting the date into our ISO14001 Form 631.001 Master list of environmental reporting dates and a large notification on the front of the air permit of the compliance date for the stack testing requirement of "a Passed test needs to be completed by April 11, 2028". CWC Textron is also requesting if possible, that language be put into our 2024 permit renewal that will specifically list out in the new permit that "a completed stack test for FG-MACT-ZZZZZ and EU-WEST-CUPOLA must be completed no later than April 11, 2028 and the helpful renewal application reminder letters indicate that the required permit stack testing requirements and the renewal application due dates can be different requirements, so please check your permit.

CWC Textron is an environmentally responsible company (A Michigan C3 Designated facility) and is currently working on several water, GHG reduction and energy sustainability projects to reduce our impact on the Muskegon Community and the people of the State of Michigan.

CWC Textron looks forward to resolving this non-emissions issue with EGLE. 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
Sr. Environmental & Facility Engineer

cc. Jenine Camilleri - EGLE
cc/via e-mail: Mr. Jamison Schiff, Textron