



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

December 27, 2016

Mr. Mike Galloway
Eaton Corporation
13100 East Michigan Avenue
Galesburg, Michigan 49053

SRN: B2209, Kalamazoo County

Dear Mr. Galloway:

VIOLATION NOTICE

On December 15, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Eaton Corporation (Facility), located at 13100 East Michigan Avenue, Galesburg, Michigan. The purpose of this inspection was to determine the Facility'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 Permit to Install (PTI) No. 323-97A.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-TESTCELLS	PTI No. 323-97A, Special Condition 10	Nitrogen oxide (NOx) 12-month rolling emissions calculations are not calculated correctly (see Comment 1 below).
FG-ALLSOURCES	PTI No. 323-97A, Special Condition 5	Facility-wide NOx emissions do not include boiler emissions.
FG-ALLSOURCES	PTI No. 323-97A, Special Condition 5	Facility is not keeping track of hazardous air pollutants (HAP) individually.
FG-ALLSOURCES	PTI No. 323-97A, Special Condition 5	Aggregate HAP 12-month rolling emissions calculations are not calculated correctly (see Comment 1 below).

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Comment 1: The 12-month rolling calculations for NOx and HAP should include that month's emissions, plus the 11 previous month's totals, even if the months are from different calendar years. The 12-month rolling totals in the records given to the AQD staff only include the addition of the emissions as the calendar year progresses.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 20, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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

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

Sincerely,



Monica Brothers
Environmental Quality Analyst
Air Quality Division
269-567-3552

MB:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ