



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
CWC Textron, Muskegon, Michigan

FROM: Meaghan Pashen, Environmental Engineer
AECAB (MN/OH)

THRU: Brian Dickens, Section Supervisor
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: CWC Textron

Facility Location: 1085 W. Sherman Blvd, Muskegon, MI 49441

Date of Inspection: March 30, 2023

EPA Inspector(s):

1. Meaghan Pashen, Environmental Engineer
2. Natalie Schulz, Environmental Engineer

Other Attendees:

1. Eric Grinstern, Environmental Quality Specialist, EGLE
2. Bob Meacham, Senior Environmental Engineer, CWC Textron
3. Jack Churchill, Associate Environmental Engineer, CWC Textron

Contact Email Address: Bob Meacham: bob.meacham@kautex.textron.com

Purpose of Inspection: To determine facility compliance with National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries Area Sources (NESHAP Subpart 5Z) and the facility Renewable Operating Permit (ROP).

Facility Type: Iron foundry

Regulations Central to Inspection: NESHAP Subpart 5Z and the facility ROP, including but not limited to the obligation to ensure proper operation of air pollution control equipment within

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established parameters, "...record the number and weight of charges added to the cupola...on a production day basis when the cupola is operating and melting", and meet the emission limit of 0.06 pounds of total metal HAP per ton of metal charged at the cupola.

Arrival Time: 8:30 AM EST
Departure Time: 11:30 AM EST

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☐ Provided Small Business Resource Information Sheet
- ☒ Small Business Resource Information Sheet not provided. Reason: Provided with Inspection Report
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Bob Meacham unless otherwise noted.

Process Description:

CWC Textron is an iron foundry that manufactures casts for the automotive industry, including crank shafts. Raw materials include pig iron, scrap metal, limestone, and silica sand. Charging occurs at the top of the cupola, referred to as the West Cupola in the permit. The raw materials are loaded in the 4,000 lb capacity charge bucket, and then melted in a furnace. There are holding furnaces for both gray and ductile iron. Emissions from the West Cupola charging operations are controlled by two 5 MMBtu direct flame afterburners, a wet cap, a venturi scrubber, and a mist eliminator.

Staff Interview:

Melting occurs during two ten-hour shifts on four days per week. On average, CWC Textron melts approximately 60,000 tons per year of metal. Scrap metal is purchased from scrapyards. Scrap mostly consists of cast iron, punching steel, and drums. No inspection of scrap is done by the facility or on-site prior to melting. No welding or torch cutting is done on-site.

CWC Textron is a gray and ductile iron foundry. Desulfurization is used for both gray and ductile iron. Gray iron is used in older crank shafts, and ductile iron is used for current crank shafts. Gray iron makes up only approximately 10% of iron cast production. Ductile iron contains manganese, and ferromanganese bricks are included in raw materials. Pouring is done manually; however, there is an auto pour unit not currently in operation. No binders are added into the process. Mostly pure green sand is used in operations.

Dust collectors are used to control particulate matter emissions on-site. The #5 dust collector controls the melting and desulfurization operations. There is a daily environmental check sheet, which includes, among other things, daily differential pressure readings and visible emissions observations of process units. Dust collector operating parameter limits are established by the manufacturer's recommendation.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

The West Cupola was not in operation during the inspection due to a fire from a transformer short in the ductile holding furnace on March 27, 2023. Neither the gray nor ductile iron furnace was in operation, and no pouring operations were occurring during the inspection. EPA requested West Cupola charge logs and metal melt records from the past 5 years.

EPA observed the differential pressure at the venturi scrubber, which was 70 psi. The facility representative stated that the scrubber liquid flow rate was not recorded. Operating parameter limits for air pollution control equipment are established by manufacturer's recommendation. EPA requested operation and maintenance plans (O&M plans), operating parameter limits, deviation reports, most recent stack tests, and daily environmental checks for air pollution control equipment.

EPA observed the differential pressure gauges at dust collectors on-site for particulate matter control of foundry operations other than the West Cupola. The #5 dust collector had a differential pressure reading of approximately 5.5 inches of water column (" w.c.). EPA observed a tear in the jacketing of #13 dust collector, and it had a differential pressure reading of 7" w.c.. See Digital Image Log and Compliance Assistance section. The #1, #2, #6, #12, #17, #19, and #20 dust collectors had differential pressure readings of 10.1, 6.1, 8.9, 13.5, 9, 3.4, and 0" w.c., respectively. The #20 dust collector was not in operation during the inspection.

EPA observed fugitive dust from third party truck on-site, see Digital Image Log and Concerns section. The truck was loading dust, limestone, and sand from an outdoor pile on-site to bring off-site to a landfill. Facility personnel stated that due to recent sweeping of facility floors, the contents of the outdoor pile were finer than usual. The truck does not have any equipment for dust suppression. There is no facility water truck on-site for roads, and no EPA Method 22 visible emission observations taken.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- O&M plans for air pollution control equipment
- Air pollution control equipment operating parameter limits
- Deviation reports (1 year)
- Most recent stack test for air pollution control equipment
- Daily environmental checks (1 year)
- West cupola charge logs (5 year)
- Metal melt records (5 years)

Compliance Assistance: EPA advised that tears in dust collector jacketing should be repaired to ensure proper capture of emissions. Facility personnel confirmed that they would repair the tear.

Concerns: EPA expressed concerns related to fugitive dust caused by third party truck. Facility personnel confirmed that they would speak with third party regarding loading procedures.

DIGITAL SIGNATURES

Report Author: Pashen,
Meaghan  Digitally signed by
Pashen, Meaghan
Date: 2023.05.22
14:34:08 -05'00'

Section Supervisor: Brian
Dickens  Digitally signed by Brian
Dickens
Date: 2023.05.22
15:23:12 -05'00'

Facility Name: CWC Textron
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APPENDICES AND ATTACHMENTS

1. Appendix A: Digital Image Log

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APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Natalie Schulz	2. Archival Record Location: Region 5 Electronic Records Center
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	IMG_0471.JPG	3/30/2023 at 09:12 CST	#13 dust collector
2	IMG_0472.JPG	3/30/2023 at 09:13 CST	Tear in #13 dust collector fabric
3	IMG_0473.JPG	3/30/2023 at 09:13 CST	Tear in #13 dust collector fabric
4	IMG_0474.JPG	3/30/2023 at 09:14 CST	Tear in #13 dust collector fabric
5	IMG_0475.JPG	3/30/2023 at 09:21 CST	Fugitive dust from dump truck
6	IMG_0476.JPG	3/30/2023 at 09:21 CST	Fugitive dust from dump truck
7	IMG_0477.JPG	3/30/2023 at 09:26 CST	Fugitive dust from dump truck
8	IMG_0478.JPG	3/30/2023 at 09:28 CST	Material pile from dump truck