

SK

**Romeo RIM, Inc.**

74000 Van Dyke Avenue  
Romeo, MI 48065

586-336-5878 Phone  
586-752-5021 Fax  
www.romeorim.com

<p>RECEIVED</p> <p>NOV 01 2013</p> <p>AIR QUALITY DIV. SEMI OFFICE</p>	<p>CJE</p>	
		<p><b>Teresa Reinwasser</b> EHS Manager teresa.reinwasser@romeorim.com</p>

October 31, 2013

Mr. Sebastian Kallumkal  
MDEQ – AQD Southeast Michigan District Office  
27700 Donald Court  
Warren, MI 48092-2793

Re: Response to Violation Notice, Late ROP Semiannual Report Certification and Compliance Report for January 1-June 30, 2013 per MI-ROP-B5854-2009 for Romeo RIM, Inc. (SRN: B5854)

Dear Mr. Kallumkal,

This submittal is in response to the Violation Notice, dated October 15, 2013, for the following cited violations for Romeo RIM, Inc. (SRN: B5854) located at 74000 Van Dyke Avenue, Romeo, Michigan, 48065:

1. Did not submit the January 1 - June 30, 2013, Renewable Operating Permit Semiannual Report Certification by the due date of September 15, 2013.
2. Did not submit the January 1 - June 30, 2013, Semiannual Compliance Report for 40 CFR 63, Subpart P-PPPP-National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products by the due date of September 15, 2013.

Please refer to the following attachment for our response to the violations cited:

- *Romeo RIM, Inc. – Response to MDEQ-AQD Violation Notice, dated October 15, 2013*

If you have any questions or concerns, please contact me at 586.336.5878, or by email at [teresa.reinwasser@romeorim.com](mailto:teresa.reinwasser@romeorim.com).

Sincerely,



Teresa Reinwasser  
EHS Manager

Attachments  
cc: File

Romeo RIM, Inc. - Response to MDEQ-AQD Violation Notice, dated October 15, 2013

Process Description	Rule/Permit Condition Violated	Dates of Violation	Description of Violation	Cause(s) and Duration of Violation	Violation Ongoing?	Summary of Corrective Actions Taken/To Be Taken and Completion/Target Dates	Steps to Prevent Reoccurrence
EU-PLT2-LINE1 FG-PLT1-RIM-IMP FG-PLT1-SCL1256&SCL34 FG-RIMPROCESS FG-MACT FG-COLDCLEANERS	MI-ROP-B5854-2009, General Condition 19 and 23, EU-PLT2-LINE1 FG-PLT1-RIM-IMP FG-PLT1-SCL1256&SCL34 FG-RIMPROCESS FG-MACT FG-COLDCLEANERS, Section VII, SC 1 & 2	9/15/2013	Permittee did not submit the January 1 - June 30, 2013, Renewable Operating Permit Semi-Annual Report Certification by the due date of September 15, 2013.  Romeo RIM's Semiannual Report Certification was received by the MDEQ-AQD on September 18, 2013.	The data collection and recordkeeping process has become significantly more tedious, complex, and time-consuming since the implementation of a new MRP system.	N	N/A	1) Re-engineer the process of data collection for recordkeeping and reporting:  A) Assemble an Improvement Team to reduce processing time by identifying and streamlining, where possible, systemic issues in the current material usage recordkeeping process.  B) Team to begin November 1, 2013.

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Romeo RIM, Inc. - Response to MDEQ-AQD Violation Notice, dated October 15, 2013

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FG-MACT	<p>MI-ROP-B5854-2009, FG-MACT, Section VII, SC 4 &amp; 6</p> <p>6) The Permittee shall submit the applicable notifications specified in...40 CFR 63.9(h)...</p> <p>*7) The permittee shall submit all semiannual compliance reports as required by 40 CFR 63.4520.</p> <p>*Note: SC 7 is referenced here instead of SC 4 as it seems to be a better fit with the cited violation than SC 4.</p>	9/15/2013	<p>Permittee did not submit the January 1 - June 30, 2013, Semiannual Compliance Report for 40 CFR 63, Subpart P- National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products by the due date of September 15, 2013.</p> <p>Romeo RIM's Semiannual Compliance Report was received by the MDEQ-AQD on September 18, 2013.</p>	Same as in the 1st Violation, see above.	N	N/A	Same as in the 1st Violation, see above.