



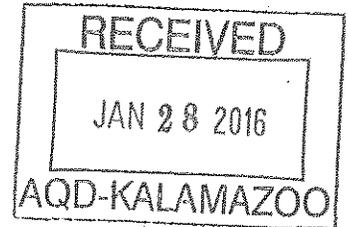
Asama
Coldwater
Manufacturing,
Inc.

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Coldwater, Michigan 49036
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Mr. Rex Lane
MDEQ Air Quality Division
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, MI 49004-5026

January 27, 2016

Re: Response to Violation Notice dated January 7, 2016 addressing
Frequency of Required Opacity Performance Testing



Dear Mr. Lane:

Asama Coldwater Manufacturing (ACM) is in receipt of your letter dated January 7, 2016 regarding the frequency of semi-annual visible emissions testing conducted to comply with our Renewable Operating Permit MI-ROP-N5814-2015 (ROP) and NESHAPS Subpart EEEEE. Both of these semi-annual performance tests demonstrated compliance with the opacity limits in our ROP above and NESHAP Subpart EEEEE. However as indicated in the Violation Notice, at issue is the delay of one month and 3 days outside of the 6 month window in conducting the second semi-annual test. These tests were conducted in the spring on May 6, 2015 and later in the fall on December 9, 2015.

To assist with our numerous compliance requirements in our ROP, ACM contracted with a third party, Network Environmental to schedule and conduct the two visual emissions tests in 2015. When Network notified us of the second test date, it was discovered that the timeframe between tests exceeded the 6 month window and rule requirement interpretation of "no less frequently than once every 6 months". We immediately notified you by phone regarding the delay and also spoke to our vendor regarding testing frequency issue.

After receiving the Violation Notice, we again discussed this situation with Network Environmental and as stated in the attached letter, they indicated that they conduct such testing throughout the state of Michigan and it is generally accepted as twice per year without a specific six-month timeframe measurement. This was a misunderstanding between ACM and Network Environmental regarding the interpretation of the rule below and the corresponding permit condition.

§ 63.7731 When must I conduct subsequent performance tests?

(b) You must conduct subsequent performance tests to demonstrate compliance with the opacity limit in § 63.7690(a)(7) for your iron and steel foundry no less frequently than once every 6 months.

To resolve this misunderstanding, Network has proposed the following two testing dates that are each within the 6 month window of the prior visual emissions test.

1. March 14, 2016 (3 months and 5 days since last test on December 9, 2015)
2. August 30, 2016 (5 months and 16 days since test scheduled for March 14, 2016)

In addition, we are upgrading our in-house compliance tracking system and schedule to ensure that we communicate with our contractors in a time frame that allows a safety window to comply with regulatory requirements of our ROP and or applicable rules and regulations.

As you are aware, we have been trying to hire an environmental manager to replace Mr. Brent Cravens who took an EHS position at another company closer to his home this past summer. While Ms. Sherri McDermott-Gillette, our safety technician did an admirable job filling in for Brent, we are happy to report that we now have filled this position. Mr. Chad Marsh will be assuming the EHS Coordinator duties for ACM on February 1, 2015.

We would also like to please request that you notify one or more key staff including Ms. McDermott-Gillette, Mr. Marsh or myself via email or voice mail if possible of incoming regulatory correspondence of this nature with reporting deadlines. A number of managers including myself have been offsite for extended time periods assisting a sister plant in Georgia with infrequent access to our incoming hardcopy mail back in Coldwater. Electronic notifications would help us to better coordinate our responses and not miss required reporting deadlines.

Thank you in advance for your consideration of this request. Also please do not hesitate to contact me if you have any questions on the information presented above.

Sincerely,



David Sutherland
Manager, HR/EHS
Asama Coldwater Manufacturing

Att.

Cc: M. Conti, General Manager