

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENTAL QUALITY





DAN WYANT DIRECTOR

February 24, 2014

Mr. Daniel Yamanaka Gokoh Coldwater, Inc. 100 Concept Drive Coldwater, Michigan 49036

SRN: N5904, Branch County

Dear Mr. Yamanaka:

VIOLATION NOTICE

On February 6, 2014, staff of the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a review of Gokoh Coldwater Inc's (Facility) Semi-Annual Compliance Certification Report for the time period October 1, 2013, through December 31, 2013. The certification report was received on January 31, 2014, and identifies several deviations from the requirements of 40 CFR, Part 63, Subpart EEEEE, National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries.

Based on a review of the certification report, staff of the AQD identified the following violations:

	Rule/Permit	
Process Description	Condition Violated	Comments
EU-LAEMPE#1AND#2	40 CFR, Part 63.7690(b)(5); Permit to Install No. 162- 11A, Condition III.3; AQD Consent Order No. 9-2013, Paragraph 9.A.1	Three hour average scrubber flow rate on Scrubber #1 was below the 50 gpm limit in the approved O & M Plan for 7.7% (120 hours) of the total operating hours during the reporting period. This deviation did not occur during a period of startup, shutdown, or malfunction as defined in 40 CFR, Part 63.2.
EU-LAEMPE#1AND#2	40 CFR, Part 63.7710(b); Permit to Install No. 162-11A, Condition III.1; AQD Consent Order No. 9-2013, Paragraph 9.A.1	Facility did not follow, include, and/or document certain aspects of daily, monthly, or quarterly inspections of the TEA capture and control system as required by Sections 4.3, 4.4, and Appendix C of the approved O & M plan.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 17, 2014 (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.

Mr. Daniel Yamanaka Page 2 February 24, 2014

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.

If you have any questions regarding the violations cited above or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,

Rex I. Lane

Senior Environmental Quality Analyst

Air Quality Division

Rex J. Lane

269-567-3547

RIL:CF

cc: Ms. Teresa Seidel, DEQ

Mr. Thomas Hess, DEQ

Ms. Mary Douglas, DEQ