

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY KALAMAZOO DISTRICT OFFICE



DAN WYANT

DIRECTOR

September 26, 2014

Mr. John Siler Gokoh Coldwater Inc. 100 Concept Drive Coldwater, Michigan 49036

SRN: N5904, Branch County

Dear Mr. Siler:

VIOLATION NOTICE

On September 16, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Gokoh Coldwater Incorporated (GCI), located at 100 Concept Drive, Coldwater, Michigan. The purpose of this inspection was to determine GCI'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 administrative rules; and the conditions of Permit to Install (PTI) No. 162-11A.

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

	Rule/Permit	
Process Description	Condition Violated	Comments
EU-SHELLCORE	PTI No. 162-11A,	Facility is not calculating and recording
· ·	Condition Nos. I.1 and	VOC emission rates on a monthly and
	VI.1	12-month rolling time period.
EU-SILOS	PTI No. 162-11A,	Facility is not calculating PM emission
	Condition Nos. I.1, II.2	rates on a monthly and 12-month
	VI.4 and VI.6	rolling time period to demonstrate
		compliance with PM emission limit.
		Facility is not tracking sand usage on a
		12-month rolling average. Facility is
		not recording the results of weekly visible emission observations.
EU-LAEMPE#1AND#2	PTI No. 162-11A,	Facility is not tracking resin and
	Condition Nos. I.1, II.1,	catalyst usage on a 12-month rolling
	II.2, II.3 and VI.3	average. Facility is not calculating and
		recording VOC emission rates on a
		monthly and 12-month rolling time
		period to demonstrate compliance with
		VOC emission limit.
EU-MISCELLANEOUS	PTI No. 162-11A,	Facility tracks material usage on a
	Condition Nos. I.1 and	monthly basis, but does not calculate
	VI.3	monthly or 12-month rolling average
		VOC emission rates as required by
· · ·		Condition VI.3 to demonstrate
		compliance with VOC emission limit.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 16, 2104 (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 GCI 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 GCI. If you have any questions regarding the violations or the actions necessary to bring GCI into compliance, please contact me at the number listed below.

Sincerely,

Ren D. Ime

Rex I. Lane Senior Environmental Quality Analyst Air Quality Division 269-567-3547

RIL:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ Ms. Mary Ann Dolehanty, DEQ Ms. Teresa Seidel, DEQ Mr. Thomas Hess, DEQ Ms. Mary Douglas, DEQ