



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
KALAMAZOO DISTRICT OFFICE



DANIEL EICHINGER
ACTING DIRECTOR

March 6, 2023

Daniel Yamanaka
GCI GOKOH Coldwater Inc
100 Concept Drive
Coldwater, Michigan 49036

SRN: N5904, Branch County

Dear Daniel Yamanaka:

VIOLATION NOTICE

On February 9, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of GCI GOKOH Coldwater Inc located at 100 Concept Drive, Coldwater, Michigan. The purpose of this inspection was to determine GCI GOKOH Coldwater Inc 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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 162-11B;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Four Kiriu Hot Shell Machines	Rule 201	The addition of new emission units does not meet the definition of modification of an existing process or process equipment. The facility will either need to obtain a Permit to Install, modify the current Permit to Install, or show that the facility qualifies to use an exemption by providing documentation of the analysis showing the equipment meets the chosen exemption.

During this inspection, it was noted that GCI GOKOH Coldwater Inc had installed and commenced operation of unpermitted equipment at this facility. The AQD staff advised

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GCI GOKOH Coldwater Inc on February 9, 2023, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the four Kirui hot shell machine process equipment. An application form is available by request, or at the following website: www.michigan.gov/air.

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

The addition of new emission units does not meet the definition of modification of an existing process or process equipment. The facility will either need to obtain a new Permit to Install, modify the current Permit to Install, or show that the facility qualifies to use an exemption by providing documentation of the analysis showing the equipment meets the chosen exemption.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by March 27, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If GCI GOKOH Coldwater Inc 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.

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Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of GCI GOKOH Coldwater Inc. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chance Collins', with a stylized flourish at the end.

Chance Collins
Environmental Quality Analyst
Air Quality Division
269-254-7119

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Rex Lane, EGLE