



GOKOH COLDWATER INCORPORATED

100 Concept Drive; Coldwater, Michigan 49036

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March 10, 2014

Mr. Rex Lane  
Michigan Department of Environmental Quality  
Kalamazoo District Office  
7953 Adobe Rd  
Kalamazoo, MI 49009-5025

**RE: GOKOH COLDWATER INCORPORATED, SRN N5904, RESPONSE TO  
FEBRUARY 24, 2014 VIOLATION NOTICE**

Dear Mr. Lane,

Enclosed please find the information you requested concerning the deviation cited in your February 24, 2014 Violation Notice. We trust that you will be satisfied with the actions we took to resolve these issues and to prevent them from reoccurring. GCI is committed to maintaining full compliance with all applicable requirements.

If you have questions, or would like to discuss this further, please contact me at (517) 270-1080.

Sincerely,

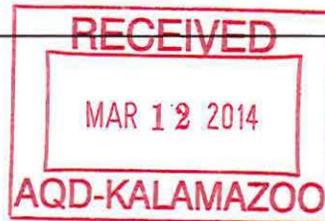
  
Daniel Yamanaka  
President

cc: S. Beckman, Goldenberg Schneider LPA



**GOKOH COOLDWATER INC. SRN N5904  
 INFORMATION IN RESPONSE TO FEBRUARY 24, 2014 VIOLATION NOTICE**

<b>.Requested Response</b>	<b>Scrubber Flow</b>	<b>Preventative Maintenance and Inspections</b>
<b>Dates the Violations Occurred</b>	The deviation from the minimum flow rate requirement occurred from October 1 through October 5 when the 3-hour average Scrubber #1 flow rate was below the 50 gpm minimum established in the Operation and Maintenance Plan submitted to the MDEQ on October 1, 2013 (O&M Plan).	Between October 1 and December 31, 2013, daily and monthly, inspections of the triethylamine (TEA) capture and control system did not include all of the elements specified by the O&M Plan. No quarterly inspection was done during the period as specified by the O&M Plan.
<b>Explanation of the Causes and Duration of the Violations</b>	Beginning on October 1, 2013, GCI attempted to maintain the liquid flow on Scrubber #1 above the 50 gpm minimum rate established in the O&M Plan. Personnel discovered, however, that the existing equipment was not adequate to maintain the 50 GPM rate on an ongoing basis. Equipment modifications to increase the recirculation flow capacity were completed on October 5, 2013. This deviation lasted for 120 hours or 7.7% of the 1549 total operating hours during the reporting period.	When preparing its first NESHAP Subpart EEEEE semiannual compliance report, GCI discovered that the inspection forms used between October 1, 2013 and December 31, 2013 did not address all elements required by 40 CFR 63.7710(b)(1) and Sections 4.3, 4.4, and Appendix C of the O&M Plan. As of March 1, 2014, O&M records document compliance with all specified inspection elements.
<b>Are the Violations Ongoing?</b>	No, the violations are not ongoing.	No, the violations are not ongoing.
<b>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.</b>	Initially, GCI attempted to maintain the 50 gpm Scrubber #1 flow rate using existing scrubber controls and maintenance adjustments. Once these efforts did not succeed, GCI purchased and installed a higher capacity recirculation pump, a new flow control valve and associated piping. These modifications were completed on October 5, 2013. Since these modifications were completed, the scrubber flow rate has been continuously at or above the 50 gpm minimum flow rate.	GCI reviewed the daily, monthly and quarterly inspection procedures and data collection forms against all applicable inspection and monitoring requirements, and revised them to ensure that each inspection monitors and documents all data required by 40 CFR 63.7710(b)(1) and Sections 4.3, 4.4, and Appendix C of the O&M Plan. As of March 1, 2014, O&M records document compliance with all specified inspection elements.  In addition, an O & M staff member is now responsible for completing all daily, monthly, quarterly, and annual maintenance and inspection activities required by 40 CFR 63.7710(b)(1), Sections 4.3, 4.4, and Appendix C of the O&M Plan, and PTI 162-11A. A supervisor has back-up responsibility for these inspections and is also responsible to



Requested Response	Scrubber Flow	Preventative Maintenance and Inspections
		regularly review the maintenance and inspection records to verify compliance with all specified requirements.
<p><b>Step Being Taken to Prevent Recurrence</b></p>	<p>No further action is necessary. The equipment retrofit resolved the flow rate issues.</p>	<p>To prevent recurrence of the deviations and to ensure continued compliance with all requirements of 40 CFR 63 Subpart EEEEE, Permit to Install 162-11A, and all other applicable requirements:</p> <ul style="list-style-type: none"> <li>• A third-party environmental consultant is currently providing additional support and oversight to ensure that all maintenance, inspection, and recordkeeping requirements specified by 40 CFR 63, Subpart EEEEE, and PTI 162-11A are properly understood and are being correctly implemented.</li> <li>• The consultant will be reviewing GCI's compliance records monthly to verify ongoing compliance with applicable requirements until we are satisfied that our systems and personnel can continuously ensure compliance.</li> <li>• We will incorporate any additional requirements contained in Renewable Operating Permit (ROP) MI-ROP-N5814-2014, when issued, into our O&amp;M system, train our personnel, and involve the same third-party oversight and verification measures as discussed above to ensure these elements are also consistently met.</li> </ul>