

Volter

February 7, 2013 Project No. G120561

Mr. Dale Turton Environmental Quality Analyst Michigan Department of Environmental Quality Kalamazoo District Office Air Quality Division 7953 Adobe Road Kalamazoo, MI 49009-5025

Re: Response to Violation Notice, Dated January 14, 2014 Sekisui Voltek, LLC, Coldwater, Michigan (SRN B8786)

Dear Mr. Turton:

This letter is in response to your January 14, 2014, Violation Notice to Sekisui Voltek, LLC regarding the reported exceedance of the hourly ammonia emission limits for Oven 7 and Oven 9. The Violation Notice indicates that Sekisui is not in compliance with Special Condition I.2, contained in Renewable Operating Permit (ROP) No. MI-ROP-B8786 for FGOVENS.

On October 29 and 30, 2013, Sekisui conducted stack tests on four of the facility's ovens to determine compliance with the emission limits contained in the ROP for FGOVENS. The ammonia results for Ovens 7 and 9 showed actual ammonia emissions of 0.350 and 0.301 pound per hour (lb/hr), respectively. The ammonia limit contained in FGOVENS is 0.1 lb/hr per oven. Sekisui submitted the results to the Michigan Department of Environmental Quality (MDEQ) Air Quality Division on January 2, 2014.

The facility reviewed the results of the ammonia testing, production and catalyst maintenance, and could not determine a conclusive reason for the ammonia emission rates for Oven 7 and 9. Sekisui will submit a Permit To Install Modification to the MDEQ to request an increase in the ammonia limits for Ovens 7 and 9 by March 21, 2014.

Sekisui takes environmental compliance very seriously and is committed to working with the MDEQ to resolve these issues. If you have any questions or require additional information, please contact me at (517) 279-3583 or Jeffrey.Kelley@sekisuivoltek.com.

Sincerely,

Jeffrey Kelley Project Engineering Manager



Lkj-By email and Certified US Mail - Delivery Receipt Requested

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