



GOKOH COLDWATER INCORPORATED

100 Concept Drive, Coldwater, Michigan 49036

Tel: (517) 279-1080 Fax: (517) 279-1081

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

October 13, 2014

**RE: GOKOH COLDWATER INCORPORATED, SRN N5904, RESPONSE TO
SEPTEMBER 26, 2014 VIOLATION NOTICE**

Dear Mr. Lane:

The information requested in your September 26, 2014 Violation Notice is provided below. The same information applies to each of the four deviations cited in your Violation Notice.

Dates the Violations Occurred

June 28, 2013 (the date PTI 162-11A was issued) to October 1, 2014

Explanation of the Causes and Duration of the Violations

Upon receipt of PTI 162-11A, which was issued June 28, 2013, GCI implemented procedures to ensure compliance with all Permit-required emission and material limits and operational restrictions. However, GCI inadvertently failed to recognize and implement some monitoring and recordkeeping requirements of the permit. GCI became aware of its oversight as a result of Michigan Department of Environmental Quality (MDEQ's) September 16, 2014 inspection and immediately began to implement procedures to meet all monitoring and recordkeeping requirements of the permit.

Are the Violations Ongoing?

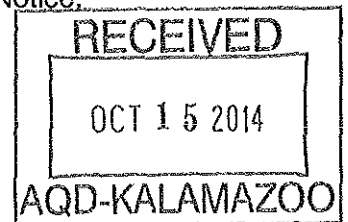
No, the violations are not ongoing.

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.

Immediately following MDEQ's September 16, 2014 inspection, GCI thoroughly reviewed PTI 162-11A and engaged an environmental consultant to assist with developing procedures and forms to satisfy all Permit monitoring and recordkeeping requirements. As of October 1, 2014, procedures are in place to satisfy all monitoring and recordkeeping requirements of PTI 162-11A.

Steps Being Taken to Prevent Recurrence

In addition to implementing forms and procedures to satisfy the monitoring and recordkeeping requirements of PTI 162-11A, GCI developed an environmental calendar to track all periodic inspections, monitoring, recordkeeping and reporting requirements, and other periodic



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compliance requirements of PTI 162-11A. The calendar identifies the due date of each requirement and specific primary and back-up responsible personnel for each requirement. I have recently added two full-time professionals to my engineering staff and am centralizing responsibility for tracking and maintaining compliance with environmental requirements such as the recordkeeping and reporting requirements of our air PTI, under the engineering staff. I will personally review the calendar with the appropriate members of my staff at least twice per month as a standing item on the agenda for our daily production planning meeting. I am confident that these changes will ensure that all applicable requirements of our PTI are met in the future.

I trust that you will be satisfied with the actions taken 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,

A handwritten signature in black ink, appearing to read 'D. Yamanaka', with a horizontal line extending to the right and a circular flourish at the end.

Dan Yamanaka, President

cc: S. Beckman, Goldenberg Schneider LPA