



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREETHER  
DIRECTOR

April 17, 2018

Mr. Mark Clark, President  
Franklin Metals Trading Corporation  
609 Tupper Lake Road  
Lake Odessa, Michigan 48849

SRN: N2199, Ionia County

Dear Mr. Clark:

**VIOLATION NOTICE**

On March 8, 2018 and March 23, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Franklin Metals Trading Corporation located at 609 Tupper Lake Road, Lake Odessa, Michigan. The purpose of this inspection was to determine Franklin Metals Trading Corporation'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 Air Pollution Control Rules; the conditions of Permit to Install (PTI) number 447-89A; and 40 CFR Part 63, Subpart RRR (Secondary Aluminum Production NESHAP).

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUFURNACE	PTI No. 447-89A, Special Condition 1.5;  40 CFR 63.1506(h)(1)(ii)	Failure to maintain afterburner temperature above 1,600 degrees Fahrenheit

During the inspection, it was determined that Franklin Metals Trading Corporation failed to maintain the temperature of the afterburner, controlling emissions from the sweat furnace, above 1,600 degrees Fahrenheit. Review of the temperature records for the previous 12 months identified 21 days that the temperature fell below 1,600 degrees Fahrenheit while the furnace was operating.

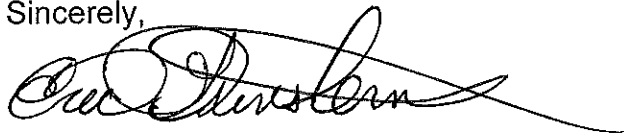
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 8, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes 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.

Mr. Mark Clark  
Franklin Metals Trading Corporation  
Page 2  
April 17, 2018

If Franklin Metals Trading Corporation 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 violation cited above and for the cooperation that was extended to me during my inspection of Franklin Metals Trading Corporation. 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 "Eric Grinstern", with a long horizontal flourish extending to the right.

Eric Grinstern  
Environmental Quality Specialist  
Air Quality Division  
616-558-0616

cc: Ms. Heidi Hollenbach, DEQ  
cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Malcolm Mead-O'Brien, DEQ