



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
GRAND RAPIDS DISTRICT OFFICE



DAN WYANT  
DIRECTOR

April 17, 2015

Mr. Dennis Flanagan  
Alloy Resource Corporation  
2281 Port City Industrial Boulevard  
Muskegon, Michigan 49442

SRN: N7888, Muskegon County

Dear Mr. Flanagan:

**LETTER OF VIOLATION**

On January 14-16, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Alloy Resource Corporation, located at 2281 Port City Industrial Boulevard, Muskegon, Michigan. The purpose of the inspection was to determine Alloy Resource Corporation's compliance with 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 administrative rules; and the conditions of Permit to Install (PTI) Number 340-07B (and subsequently PTI No. 340-07C).

Based upon the results of the inspection, as well the review of records received on January 30, 2015 and March 9, 2015, the following air pollution violations have been identified at your facility:

<b><u>Process Description</u></b>	<b><u>Rule or Permit Condition Violated</u></b>	<b><u>Comments</u></b>
FGFURNACES	PTI No. 340-07B Special Condition V.1	Failure to conduct emission testing by the established deadline
FGFURNACES	PTI No. 340-07B Special Condition V.2	Failure to verify lime injection rates to meet the emission limits within 90 days of initial startup
FGFURNACES	PTI No. 340-07B Special Condition II.1	Exceedance of the pound per hour aluminum throughput limit
FGMACT-RRR	PTI No. 340-07B Special Condition V.1 (40 CFR 63.1511(b))	Failure to conduct emission testing within 90 days of initial startup of a Group 1 furnace

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<u>Process Description</u>	<u>Rule or Permit Condition Violated</u>	<u>Comments</u>
FGMACT-RRR	PTI No. 340-07B Special Condition VI. 5 (40 CFR 63.1510(d)(2))	Failure to inspect each capture/collection system at least once each calendar year
FGMACT-RRR	PTI No. 340-07B Special Condition VII. 4 (40 CFR 63.1516(b))	Failure to submit semiannual report for the time period of July 2013 to December 2013

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 8, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a 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; and what steps are being taken to prevent a reoccurrence.

If Alloy Resource 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 violations cited above and for the cooperation that was extended to me during my inspection Alloy Resource Corporation. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Eric Grinstern  
Environmental Quality Specialist  
Air Quality Division  
616-356-0266

cc: Ms. Heidi Hollenbach, DEQ  
cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ