

September 4, 2018

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



Re: Violation Notice Dated August 14, 2018
Issued to Real Alloy Specification, LLC
SRN N5957, Branch County

Dear Mr. Lane:

On August 14, 2018 the Real Alloy Specification, LLC (Real Alloy) facility in Coldwater, Michigan received a violation notice, dated August 14, 2018, from your office. The violation notice was issued in response to the submission of results from emissions testing conducted May 22 – 25, 2018. The associated test was performed on the reverberatory furnace #1N (EUALFURN1), the respective baghouse collector and flue at the North Plant located at 368 West Garfield Road, Coldwater, Michigan. As referenced in the violation notice, the stack test report forwarded to the Air Quality Division (“AQD”) by Real Alloy on July 23, 2018 showed PM10 and PM emission rates in excess of the state limits in Michigan Renewable Operating Permit (ROP) MI-ROP-5957-2012e, Conditions I.9, I.11 and I.37.

Due to the unexpected results of the PM10 and PM emissions testing at Coldwater in April and May 2018, Real Alloy is currently working with an air permitting consultant to prepare an application to modify the PTI/ROP to raise the PM10 and PM limits for these sources above the tested short term emission rates. These proposed permit changes will trigger modeling requirements and require the public notice of the modified PTI. Real Alloy expects the permit modification application package to be completed and submitted to MDEQ by the end of September 2018, and a draft PTI issued by the Permit Section in Lansing within 9 months of submittal. Once the agency issues a modification to the PTI, the company will request that the ROP renewal incorporate the new limits for the impacted furnace flues and baghouses at the Coldwater site.

**REAL ALLOY SPECIFICATION, INC.
368 WEST GARFIELD AVENUE
COLDWATER, MICHIGAN 49036**

REAL ALLOY

If you have any questions regarding this response, please contact Jeff Ferg at the following telephone number: (216) 755-8822, or email address: Jeff.Ferg@realalloy.com.

Sincerely,



Doug Bryant
Plant Manager

cc: Andy Jennings, Real Alloy – Corporate HSE
Jeff Ferg, Real Alloy – Corporate HSE
Brady Myers, Real Alloy – Corporate HSE
Janine Caldwell, Real Alloy – Coldwater
Craig Fitzner – MDEQ
Mary Ann Dolehanty – MDEQ
Christopher Ethridge – MDEQ
Jenine Camilleri – MDEQ
Mary Douglas – MDEQ

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