

September 10, 2018

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

Re: Violation Notice Dated September 4, 2018
Issued to Real Alloy Specification, LLC
SRN N5957, Branch County



Dear Mr. Lane:

On September 4, 2018 the Real Alloy Specification, LLC (Real Alloy) facility in Coldwater, Michigan received a violation notice, dated September 4, 2018, from your office. The violation notice was issued in response to the submission of results from emissions testing conducted July 10-12, 2018. The associated test was performed on the Reverberatory Furnaces 7N and 8N and their respective flues; and Reverberatory Furnace 2N flue at the North Plant located at 368 West Garfield Road in Coldwater, Michigan. As referenced in the violation notice, the stack test report submitted to the Air Quality Division (AQD) on August 28, 2018 showed emission rates in excess of the state limits in Michigan Renewable Operating Permit (ROP) MI-ROP-5957-2012e, Conditions I.17, I.19, I.21, I.23, I.41, and I.42.

As you are aware, Real Alloy is developing a PTI modification application package with the support of Trinity Consultants to address comprehensively the exceedances of state limitations for several furnace flues at both South and North plants. In exchange for raising the short-term emission limitations for the non-compliant emission units tested in April-August 2018, Real Alloy will voluntarily restrict long-term rolling 12-month emissions of PM10, Total Hydrocarbons, Nitrogen Oxides, and Sulfur Dioxide below major source thresholds. The proposed permit changes will trigger MDEQ modeling requirements and will also require the public notice of the modified PTI. Real Alloy expects the permit modification application package to be completed and submitted to MDEQ- AQD 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 be able to sign the proposed Consent Order to address the pending enforcement action by MDEQ-AQD and request that the ROP renewal incorporate the new limits for the impacted furnace flues and baghouses at the Coldwater site.

If you have any questions regarding this written response required by the violation notice, please contact me or Jeff Ferg in Corporate HSE at the following telephone number: (216) 755-8822, or email address: Jeff.Ferg@realalloy.com.

Sincerely,

Doug Bryant
Coldwater North Plant Manager

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

REAL ALLOY

Cc: Andy Jennings, Real Alloy – Corporate HSE
Brady Myers, Real Alloy – Corporate HSE
Jeff Ferg, Real Alloy – Corporate HSE
Janine Caldwell, Real Alloy – Coldwater
Steve Zervas, Trinity Consultants – Ann Arbor
Jenine Camilleri, MDEQ – Enforcement
Mary Douglas, MDEQ - Kalamazoo

REAL ALLOY