

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENTAL QUALITY





May 11, 2016

Mr. Gregory Hall Real Alloy Specification, Inc. 368 West Garfield Avenue Coldwater, Michigan 49036

Dear Mr. Hall:

SRN: N5957, Branch County

VIOLATION NOTICE

On April 8, 2016, the Department of Environmental Quality (DEQ), Air Quality Division, received written notification from Mr. Andy Jennings, Real Alloy, HSE Director, of an exceedance of the chlorine injection rate from Furnace #8 (EUALFURN8-S1) at Real Alloy Specifications' Coldwater plant (Facility). Per the notification, the total reactive flux injection rate exceedance on March 24, 2016, was the result of adding a zinc-containing scrap charge during the alloying process of a furnace heat.

Based on a review of the written notification, the following violation is noted:

Process Description	Rule/Permit	Commonte
Process Description FGALBLDG-S1 (EUALFURN8-S1)	Condition Violated MI-ROP-N5957-2012e, Condition III.1, 40 CFR 63.1506(m)(5)	Comments On March 24, 2016, EUALFURN8-S1 had a chlorine rate of 116 pounds/ton feed charge. Under the current OMM Plan (10th Revision-March 2016) the furnace chlorine injection limit is 56.0
		pounds chlorine/ton feed charge.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by June 1, 2016 (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.

If the Facility 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.

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Thank you for your attention to resolving the violation cited above. If you have any questions regarding the violation or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,

Rex I. Lane

Senior Environmental Quality Analyst

Air Quality Division 269-567-3547

RIL:CF

cc: Ms. Lynn Fiedler, DEQ

Ms. Teresa Seidel, DEQ

Ms. Heidi Hollenbach, DEQ

Mr. Thomas Hess, DEQ

Ms. Mary Douglas, DEQ-