



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYHER
DIRECTOR

August 14, 2018

Mr. Doug Bryant
Real Alloy Specification, LLC
368 West Garfield Avenue
Coldwater, Michigan 49036

SRN: N5957, Branch County

Dear Mr. Bryant:

VIOLATION NOTICE

On July 23, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received an emission test report for Real Alloy Specification, LLC (Facility), located at 368 West Garfield Avenue, Coldwater, Michigan. Emission testing was performed May 22-25, 2018, associated with Reverberatory Furnace 1N (EUALFURN1) for determination of compliance with emission limitations in Renewable Operating Permit No. MI-ROP-N5957-2012e.

Based on a review of the emission test report dated July 13, 2018, the following violations were noted:

Process Description	Rule/Permit Condition Violated	Comments
FGALFURN1/2/7/8; EUALFURN1	MI-ROP-N5957-2012e, Condition I.9	Average PM10 emission rate during testing was 0.057 pounds/ton feed charge. Emission limitation is 0.034 pounds/ton feed charge.
FGALFURN1/2/7/8; EUALFURN1	MI-ROP-N5957-2012e, Condition I.11	Average particulate matter (PM) emission rate during testing was 0.041 pounds/ton feed charge. Emission limitation is 0.012 pounds/ton feed charge.
FGALFURN1/2/7/8; SVALFURN1	MI-ROP-N5957-2012e, Condition I.37	Average PM10 emission rate during testing was 0.74 pounds/ton feed charge. Emission limitation is 0.530 pounds/ton feed charge.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 4, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the

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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 recurrence.

Please submit the written response to the DEQ, AQD, 7953 Adobe Road, Kalamazoo, Michigan 49009; and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to AQD staff during the emission test observations of the Facility. If you have any questions regarding the violations 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. Janine Caldwell, Real Alloy
Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Mary Douglas, DEQ