



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYHER  
DIRECTOR

September 4, 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 August 28, 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 July 10-12, 2018, associated with Reverberatory Furnaces 7N and 8N and their respective flues; and Reverberatory Furnace 2N flue, 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 August 27, 2018, the following violations were noted:

Process Description	Rule/Permit Condition Violated	Comments
FGALFURN1/2/7/8; EUALFURN7 and EUALFURN8	MI-ROP-5957-2012e, Condition I.17	Nitrogen oxide (NOx) emission limit is 0.115 pounds/ton feed charge. The average tested rate was 0.12 pounds/ton feed charge.
FGALFURN1/2/7/8; EUALFURN7 and EUALFURN8	MI-ROP-5957-2012e, Condition I.19	Sulfur oxide emission limit is 0.080 pounds/ton feed charge. The average tested rate was 0.15 pounds/ton feed charge.
FGALFURN1/2/7/8; EUALFURN7 and EUALFURN8	MI-ROP-5957-2012e, Condition I.21	Particulate Matter (PM) 10 emission limit is 0.036 pounds/ton feed charge. The average tested rate was 0.12 pounds/ton feed charge.
FGALFURN1/2/7/8; EUALFURN7 and EUALFURN8	MI-ROP-5957-2012e, Condition I.23	PM emission limit is 0.023 pounds/ton feed charge. The average tested rate was 0.026 pounds/ton feed charge.

Mr. Doug Bryant  
Page 2  
September 4, 2018

FGALFURN1/2/7/8; SVALFURN2	MI-ROP-5957-2012e, Condition I.41	NOx emission limit is 0.253 pounds/hour. The average tested rate was 0.38 pounds/ hour.
FGALFURN1/2/7/8; SVALFURN2	MI-ROP-5957-2012e, Condition I.42	PM emission limit is 0.043 pounds/hour. The average tested rate was 0.075 pounds/hour.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 25, 2018 (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.

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. 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