

Law Offices

January 6, 2014

191 N. Wacker Drive
Suite 3700
Chicago, IL
60606-1698

VIA E-MAIL: LANER@MICHIGAN.GOV

(312) 569-1000
(312) 569-3000 fax
www.drinkerbiddle.com

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

CALIFORNIA

DELAWARE

ILLINOIS

NEW JERSEY

NEW YORK

PENNSYLVANIA

WASHINGTON D.C.

WISCONSIN

Re: Violation Notice Dated December 6, 2013 Issued to Aleris Specification Alloys, Inc., SRN N5957

Dear Mr. Lane:

The Aleris Specification Alloys, Inc. facility in Coldwater, Michigan (“facility”) received a violation notice, dated December 6, 2013, from your office. I am writing this response on behalf of Aleris International, Inc. (“Aleris”). The violation notice was in response to the results of emissions testing that was performed on September 12 and 13, 2013. The associated tests were performed on reverberatory furnaces #7 and #8 and their respective flues at the facility located at 368 West Garfield, Coldwater, Michigan. As referenced in the violation notice, the stack test report forwarded to the Air Quality Division (“AQD”) on November 7, 2013 showed PM₁₀ emissions in excess of the limits in Michigan Renewable Operating Permit (ROP) MI-ROP-5957-2012a, Conditions 1.51 and 63.

These PM₁₀ emission results were unexpected. As set forth in the letter transmitting the stack test report, an investigation was begun to determine the reason for the results and what the appropriate response should be to correct the problem. At the present time Aleris with the assistance of a consulting firm is evaluating the possibility of requesting a revision to the PM₁₀ permit limits. If it is determined that such a request may properly be made, a request for a modification to the permit will be submitted. A decision concerning this submittal is expected by the end of January. Aleris commits to keep the AQD apprised of its progress.

Finally, as you are aware we have been in the process of negotiating a possible Consent Order with the AQD regarding the Aleris Recycling, Inc. Coldwater South facility. In the latest settlement discussions, the AQD told us that they want to include resolution of this violation notice in the final Consent Order including an appropriate compliance schedule and final compliance demonstration. These discussions are ongoing at the present time.

Established 1849

Rex Lane

January 6, 2014

Page 2

If you have any questions regarding this response, please contact me at the following telephone number: (312) 569-1441, or email address roy.harsch@DBR.com. Alternatively please contact Gary Barnett at his telephone number: (216) 910-3697, or email address: gary.barnett@aleris.com.

Very truly yours,



Roy M. Harsch

cc: Mr. Kenneth Willings
Mr. Gary Barnett
Mr. James Buckert
Mr. Brady Meyers