

June 21, 2018

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

Re: Violation Notice Dated June 1, 2018  
Issued to Real Alloy Recycling, LLC  
SRN N5957, Branch County



Dear Mr. Lane:

On June 4, 2018 the Real Alloy Recycling, LLC (Real Alloy) facility in Coldwater, Michigan received a violation notice, dated June 1, 2018, from your office. The violation notice was issued in response to the submission of results from emissions testing conducted April 5 – 6, 2018. The associated test was performed on the reverberatory furnace #7S (EUIMREVERBFURN-S1) and the respective baghouse collector at the South Plant located at 267 North Fillmore Road, Coldwater, Michigan. As referenced in the violation notice, the stack test report forwarded to the Air Quality Division (“AQD”) by Real Alloy on May 17, 2018 showed NOx, PM10 and HCl emissions in excess of the state limits in Michigan Renewable Operating Permit (ROP) MI-ROP-5957-2012e, Conditions I.14, I.16 and I.22.

Due to the unexpected results of the NOx and PM10 emissions testing at Coldwater in April 2018, Real Alloy is currently working with an air permitting consultant to prepare an application to modify the PTI/ROP to raise the NOx and PM10 limits for these sources above the tested emission rates. These increased NOx and PM10 emission rates may trigger modeling requirements but will not exceed the significance thresholds for PSD/NSR permitting review. Real Alloy expects the permit modification application package to be completed by the end of July 2018, and a draft PTI issued by the Permit Section in Lansing within 4 to 6 months of submittal. Once the agency issues a modification to the PTI, the company can request that the ROP renewal incorporate the new limits for the impacted furnace flues and baghouses.

Additionally, an inspection was completed on the 7S Reverb Furnace flue and appropriate repairs were made to the damper. These ongoing repairs will be completed by the week of July 9, 2018. A retest of the Furnace #7S flue for HCl and PM10 is anticipated in early August 2018.

**REAL ALLOY RECYCLING, LLC**  
**267 NORTH FILLMORE ROAD**  
**COLDWATER, MICHIGAN 49036**

# REAL ALLOY

Mr. Lane  
June 21, 2018  
Page 2

If you have any questions regarding this response, please contact Jeff Ferg at the following telephone number: (216) 755-8822, or email address: [Jeff.Ferg@realalloy.com](mailto:Jeff.Ferg@realalloy.com).

Sincerely,



Mike Chenoweth  
Plant Manager

cc: Andy Jennings, Real Alloy – Corporate HSE  
Jeff Ferg, Real Alloy – Corporate HSE  
Brady Myers, Real Alloy – Corporate HSE  
Janine Caldwell, Real Alloy – Coldwater  
Craig Fitzner – MDEQ  
Mary Ann Dolehanty – MDEQ  
Christopher Ethridge – MDEQ  
Jenine Camilleri – MDEQ  
Mary Douglas – MDEQ

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