



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



DAN WYANT
DIRECTOR

March 3, 2014

Mr. Daniel Rangel
Aleris Specification Alloys, Inc.
368 West Garfield Avenue
Coldwater, Michigan 49036

SRN: N5957, Branch County

Dear Mr. Rangel:

VIOLATION NOTICE

On February 25, 2014, staff of the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received a letter signed by Mr. Roy Harsch, attorney, Drinker, Biddle & Reath LLP, via email. This letter discloses that following a July 2013 emission test of the thermal chip dryer (EUALDRYER3-S1) at Aleris Specifications Alloys, Inc., and the August 27, 2013, submittal of a revised OM & M plan with a new minimum 3-hour block average afterburner temperature of 1,470 degrees F, the temperature set point was not reset from a lower 2008 emission test temperature set point (1,427 degrees F) to the higher value until January 29, 2014. The letter contained two histograms that identify the number of 3-hour block averages between August 27, 2013, and January 29, 2014, and also between August 27, 2013, and December 31, 2013, across three temperature ranges below 1,470 degrees F, and one temperature range between 1,470 and 1,519 degrees F.

Based on a review of the February 25, 2014, letter, staff of the AQD identified the following violations:

Process Description	Rule/Permit Condition Violated	Comments
EUALDRYER3-S1	40 CFR, Part 63.1506(f)(1) and (2); MI-ROP-N5957-2012b, Conditions III.1 and IV.1	Between 8/27/13 and 1/29/14, there were 636 3-hour block averages where the facility did not maintain the thermal chip dryer 3-hour block average afterburner temperature at or above the minimum temperature established during the 7/9/13 performance test. Between 8/27/13 and 1/29/14, the facility did not operate the thermal chip dryer in accordance with the revised OM & M plan that was submitted on 8/27/13.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 24, 2014 (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.

Mr. Daniel Rangel

Page 2

March 3, 2014

If Aleris Specification Alloys 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.

If you have any questions regarding the violations cited above or the actions necessary to bring Aleris Specification Alloys 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. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ