

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENTAL QUALITY





March 29, 2017

Mr. Greg Hall Real Alloy Specification, Inc. 368 West Garfield Avenue Coldwater, Michigan 49036

Dear Mr. Hall:

SRN: N5957, Branch County

VIOLATION NOTICE

On March 23, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received an emission test report from Real Alloy Specification, Inc. (Facility), located at 368 West Garfield Avenue, Coldwater, Michigan. The emission test was completed between February 22-24, 2017, and submission of the test report satisfies the requirement under Permit to Install (PTI) No. 109-16, Condition V.3, to determine the nitrogen oxides (NOx) emission rate from the exhaust flues serving reverbatory furnaces EUALFURN7-S1 and EUALFURN8-S1 on or before March 1, 2017.

Based on a review of the reverbatory furnace flue emission test report dated March 22, 2017, the following violations are noted:

	Rule/Permit	
Process Description	Condition Violated	Comments
FGALFURN1/2/7/8-S1	PTI No. 109-16, Condition I.47	Flue gases from EUALFURN7 through SVALFURN7/8 has a NOx emission limit of 0.231 pounds/ton of feed charge. The NOx emission rate during the February 2017 stack test was 0.25 pounds/ton of feed charge.
FGALFURN1/2/7/8-S1	PTI No. 109-16, Condition I.59	Flue gases from EUALFURN8 through SVALFURN7/8 has a NOx emission limit of 0.095 pounds/ton of feed charge. The NOx emission rate during the February 2017 stack test was 0.36 pounds/ton of feed charge.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 19, 2017 (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.

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 me during the emissions 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

Rex I Ime

269-567-3547

RIL:CF

cc: Ms. Lynn Fiedler, DEQ

Ms. Mary Ann Dolehanty, DEQ

Mr. Christopher Ethridge, DEQ

Mr. Thomas Hess, DEQ

Ms. Mary Douglas, DEQ