



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
KALAMAZOO DISTRICT OFFICE



DANIEL EICHINGER
ACTING DIRECTOR

April 6, 2023

Douglas Bryant
Real Alloy Specification, Inc.
368 West Garfield Avenue
Coldwater, Michigan 49036

SRN: N5957, Branch County

Dear Douglas Bryant:

VIOLATION NOTICE

On March 13, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received the 2022 ROP Annual and Semi-Annual Certification for Real Alloy Specification, LLC located at 368 West Garfield Avenue, Coldwater, Michigan. The Facility is subject to the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-N5957-2022;

In the ROP Certification, the Facility reported the following:

Process Description	Rule/Permit Condition Violated	Comments
FGMACTRRR	Special Condition (SC) V.2 in MI-ROP-N5957-2023 as it applies to emission limits for PM (40 CFR 63.1505(i)(1)) and dioxins and furans (D/F) (40 CFR Part 63.1505(i)(3) within EUIMROTFURN1/2	The facility is required by 40 CFR Part 63, Subpart RRR to conduct compliance testing no less frequently than every 5 years from the date of the last test. The facility reported that the 5-year deadline for EUIMROTFURN1/2 has lapsed as of 10/12/22.

This process is subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for new or existing secondary aluminum production facilities that is (or is part of) a major source of hazardous air pollutant (HAP) emissions. These standards are found in Title 40 of the Code of Federal Regulations (CFR) Part 63, Subpart RRR. The regulations cover emissions from group 1 and group 2 furnaces, scrap shredders, dryers, delacquering/decoating kilns, rotary dross coolers, and secondary aluminum processing units.

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As part of this NESHAP, the facility is required to conduct subsequent compliance testing, after an initial compliance test, to demonstrate compliance with all applicable emission limits no less frequently than every 5 years from the date of the last test and each time the permittee elects to change an operating limit or make a process change likely to increase HAP emissions.

On the Annual and Semi-Annual ROP Certifications, the Facility reported that as of October 12, 2022, the required 5-year retest requirement for EUROTUFURN1/2 had lapsed.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 27, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a recurrence.

Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, 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 violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Amanda Cross
Senior Environmental Quality Analyst
Air Quality Division
(269) 910-2109

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Rex Lane, EGLE