

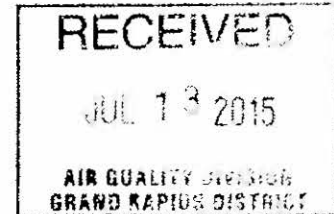


NON-FERROUS CAST ALLOYS, INC.
1146 North Gateway Blvd.
Norton Shores, MI 49441

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www.nfca.com

ISO 9002 Registered

Mr. Eric Grinstern
Michigan Department of Environmental Quality
Grand Rapids District Office
350 Ottawa, NW – Unit 10
Grand Rapids, Michigan 49503



Dear Mr. Grinstern:

In regard to the violation of condition, Permit to Install No. 28-99E Special Condition II.3, I submit the following causes and duration of the violations as have been determined since receipt of your Letter of Violation.

In review of usages for the calendar year 2014 it appears the increased usage of flux occurred during the month of July and has continued through my current records. This increase would initially indicate that the increase was perhaps a reflection of the heat and humidity that typically occurs during the summer months. These two conditions have a direct effect on the melting of aluminum and the use of flux.

I have compiled the following points while observing and meeting with members of our production team to access the potential causes of excessive flux use beyond the amounts permitted in our Permit to Install No. 288-99E.

1. Repeated de-gassing while also fluxing (deliberate).
 - a. De-gassing may not require the addition of more flux.
 - b. Determine need and access.
2. Repeated de-gassing while also fluxing (accidently pushing the flux button)
 - a. Control measures to be established and monitored.
3. Fluxing unit left on with timer indicating pot is done.
 - a. Determine if gas and flux still being injected after the timer goes off.
4. Proper cleaning and maintenance of fluxing units to prevent excessive flux usage.
 - a. Preventive maintenance schedules, daily, weekly, and monthly.



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It is the intention of Non-Ferrous Cast Alloys, Inc. complete the following in 45 days.

1. Monitor and address the observations previously listed.
2. Apply for a new Permit to Install with changes to Special Condition II.3.

If there are other approaches that you have seen used in other facilities we are very open to any other options that you may have seen at other non-ferrous facilities.

I appreciate your help and efforts in working with us to maintain a manufacturing facility that leaves the smallest environmental impact possible.

Best Regards,

A handwritten signature in black ink, appearing to read "Joe Chmelar", is written over a horizontal line.

Joe Chmelar
Environmental, Health, and Safety
Non-Ferrous Cast Alloys, Inc.