



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



DAN WYANT
DIRECTOR

December 11, 2015

Mr. Dennis Flanagan
Alloy Resource Corporation
2281 Port City Industrial Boulevard
Muskegon, Michigan 49442

SRN: N7888, Muskegon County

Dear Mr. Flanagan:

LETTER OF VIOLATION

On December 1, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the results of emissions testing conducted on September 23-24, 2015, at Alloy Resource Corporation (ARC), located at 2281 Port City Industrial Boulevard, Muskegon, Michigan. This testing was conducted to determine compliance with the emission limits within Permit to Install No. 340-07C and the National Emissions Standards for Hazardous Air Pollutants for Secondary Aluminum Production (Subpart RRR).

The following violations were identified in the test report:

Process Description	Rule/Permit Condition Violated	Comments
FGFURANCES	PTI No. 340-07C, Special Conditions I.3	Exceedance of particulate matter (PM10) emission rate in pounds per hour.
FGFURANCES	PTI No. 340-07C, Special Conditions I.4	Exceedance of particulate matter (PM2.5) emission rate in pounds per hour.
FGMACT-RRR	PTI No. 340-07C Special Condition I.1 (40 CFR 63.1505(i)(3))	Exceedance of the dioxins and furans emission limit. (grain of D/F TEQ per ton of charge)

The test report documents that emissions of particulate matter and dioxins and furans from the process equipment associated with FGFURANCES and FGMACT-RRR exceed the emission limits contained in PTI No. 340-07C and 40 CFR Part 63, Subpart RRR. Additionally, failure to comply with Permit to Install No. 340-07C subjects ARC to stipulated fines in accordance with Consent Order No. 31-2015.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 5, 2016. 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 ARC 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. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Grinstern", with a stylized flourish extending to the right.

Eric Grinstern
Environmental Quality Specialist
Air Quality Division
616-356-0266

cc: Ms. Heidi Hollenbach, DEQ
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ