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ISO 9001 AND 14001 CERTIFIED

February 8, 2023

Department of Environment, Great Lakes, and Energy (EGLE)

Air Quality Division

Marquette District

1504 West Washington Street

Marquette, MI 49855

RE: Violation Notice for Alter Metal Recycling Kingsford, MI dated January 19, 2023

Dear Mr. Scanlan

This letter is in response to the violation notice sent on January 19, 2023, that was a result of an onsite inspection at our Kingsford Facility on December 2, 2022.

The following permit violations were identified:

EU-SHREDDER, Special condition IV.2 of PTI No. 16-15A. A device to monitor the water injection rate for the smart water system was not installed.

EU-SHREDDER, Special Condition VI.2 of PTI No. 16-15A. Daily records of the water injection rate for the Smart Water Injection System are not being kept.

EU-SHREDDER, Special Condition III.1 of PTI No 16-15. Records provided for September 2021 show the daily 6- hour operating permit exceeded.

Smart Water Injection

As we discussed during the December 2, 2022, inspection, the smart water injection system was installed by METSO at the same time as the new shredder in 2014. METSO has stopped providing services to the smart water injection system. In September of 2022, Alter identified an issue with the smart water system. Water injected into the shredder is dictated by the shredder motor amperage. As the shredder motor amperage increases/decrease the amount of water injected into the shredder follows the shredder motor amperage increase/decrease. The water injection system operates correctly and indicates the gallons per minute, but the totalizing function would randomly reset while the shredder was operating. In October 2022, Alter sent the touch screen HMI to Pinnacle Engineering to troubleshoot this random resetting of the water totalizing issue. Pinnacle was unable to restore the totalizing function on the HMI. Prior EGLE inspections, Alter used water utility bills to demonstrate

use/tracking of the smart water system. This information was provided to the EGLE inspector at the December 2, 2022, inspection.

Since the December 2, 2022, Alter has arranged with the village water department to install an additional water meter signal generator that will track water usage at the shredder. The additional water meter device allows for remote reading of the water meter. Alter is now tracking smart water use, but the village water department system only reads to the nearest 1,000 gallons of water (tracking for billing based on 1,000 gallons of water used). The meter and remote reader were installed in January 2023 and water records are maintained starting February 2023.

In addition, Pinnacle is providing a new water meter and HMI that will totalize water use down to a gallon of water used. This installation/programing will be completed by Mid-March 2023.

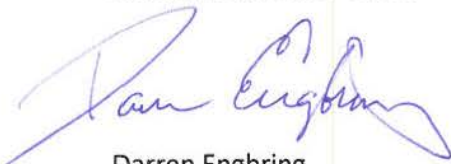
Operating Hours

This issue is a result of a misinterpretation of the permit condition by Alter. Alter had interpreted the "6 hr/day... as determined at the end of each calendar month" as operating an average of 6 hrs./day for month (i.e., 30 days, do not exceed 180 hrs.). This is also an artifact of the original permit application. Unfortunately Alter did not address daily operating hours with the recent permit update. It was not addressed it because the dispersion model accounted for 1,430 hr/yr. operating limit and there was no hourly limitation determined. Since the Violation notice was issued, Alter has not operated the shredder for greater than 6 hrs./day. Alter will reach out to the EGLE permit writer to determine if the 6 hrs./day limitation can be removed. If so, Alter will follow the process to amend the 6 hr/day limitation currently in the permit. Until that time, Alter will proceed with a 6 hrs./day operating limit for the shredder.

Thank you for your time and consideration on these issues. If you needed any additional information, please let me know. I can be reached at 414-290-6553 or email at darren.engbring@altertrading.com

Sincerely

ALTER METAL RECYCLING



Darren Engbring

Regional Environmental Director

CC: Jenine Camilleri, EGLE (mail/email)

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