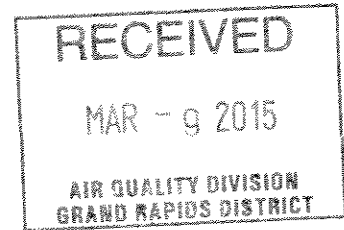


Metal Technologies

Ravenna Ductile Iron

March 5, 2015

Mr. Eric Grinstern
Michigan Department of Environmental Quality
State Office Building, 5th Floor
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503
616-356-0266



Via email: grinsterne@michigan.gov

Re: February 20, 2015 Violation Notice Written Response

Dear Mr. Grinstern,

Please accept this as the written response as required by the Violation Notice (VN) dated February 20, 2015. The VN is in regards to Ravenna Ductile Iron's ("RDI") November 2014 stack testing results.

RDI strongly believes that the results of the stack test are flawed. RDI has not changed any aspect of operations that could explain the results, which were up to two orders of magnitude greater than previous results (March 2010). For illustrative purposes, please consider the following; between 2010 and 2014, RDI's production rose less than 10%, while the results of the November 2014 stack test suggest that the rate of arsenic emissions rose over 94,000% during the same period. There have been no raw material or operational changes that could explain this discrepancy. While there may be no way of proving this, it is assumed that the testing was flawed due to errors in sampling that were a result of the extreme weather conditions. The stack test vendor specifically noted in the "Summary of Events and Results" section of the report, "Due to severe cold weather, test equipment, specifically sampling probes and sample lines, froze repeatedly, making it impossible to complete certain tests. Other tests had to be paused and re-started multiple times."

Due in part to problems with testing and high results, RDI conducted a second round of testing to either verify or refute the results of the November 2014 test. As of February 24, 2015 only the preliminary particulate matter results are known for the supplemental testing. These results support RDI's belief that the November 2014 results were flawed.

I respectfully request an extension to present any conclusions until we receive the final results of the supplementary testing.

There is no reason to believe that this violation is ongoing.

Respectfully,

Dan Plant
Corporate Environmental Manager
260-920-2137
dplant@metal-technologies.com