

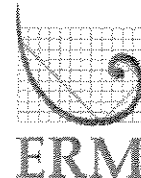
08 June 2015
PN 0296323



Environmental
Resources
Management
Michigan, Inc.

3752 128th Avenue
Leland, MI 49424-9261
(616) 993-3500
(616) 993-3777 (fax)
<http://www.ermi.com>

Mr. Eric Grinstern
Michigan Department of Environmental Quality
Air Quality Division
State Office Building, 6th Floor
350 Ottawa Ave. NW, Unit 10
Grand Rapids, Michigan 49503-2341



Re: Metal Technologies - Ravenna Ductile Iron (RDI) - SRN: N5866
Letter of Violation dated 5 May 2015

Dear Mr. Grinstern:

This letter is being provided in response to the Letter of Violation (LOV) issued to RDI on 5 May 2015. The violation listed is in reference to Renewable Operating Permit (ROP) No. MI-ROP-N5866-2014 at RDI's facility in Ravenna, Michigan. The LOV states that RDI exceeded the pound per hour formaldehyde emission rate for FG-MELTING contained in the ROP.

The LOV requests information on the cause and duration of the nonconformance and steps taken to prevent a reoccurrence.

The exceedance of the formaldehyde emission limit was discovered during stack testing conducted in February 2015. Based upon previous stack testing conducted by the facility and the current facility operating parameters, an exceedance was not anticipated. Therefore, RDI investigated the exceedance in great depth to try and determine if there was something that they could modify to bring the emissions into compliance. However, there was not any one condition that could be identified that directly related to the level of formaldehyde emissions. Therefore, it appears that the higher level of emissions may be the new expected level of emissions and RDI will be submitting a permit modification to allow for the higher level of emissions. The application for the permit modification will be submitted no later than 26 June 2015.

The emission limit was established based upon the air toxics analysis in the previous permitting action. In order to determine that a permit modification allowing for an increased level of formaldehyde emissions would be acceptable, RDI conducted formaldehyde dispersion modeling

using the emissions from FG-MELTING and FG-SAND. The modeling indicated that the increased level of emissions from FG-MELTING resulted in a predicted ambient impact that was less than 50% of the formaldehyde IRSL (0.038 ug/m^3) and less than 2% of the formaldehyde ITSL (0.44 ug/m^3). This modeling demonstration can be provided to the MDEQ prior to the submittal of the permit modification upon request.

We believe that with the revised PTL, RDI will be able to maintain compliance going forward with the air toxics rules.

If you have any questions, please feel free to contact me at (616) 738-7396.

Sincerely,



Matthew Kwiatkowski, P.E.
Senior Project Manager

MGK:au

cc: Dean Lynn, RDI
Dan Plant, RDI

Mr. Thomas Hess, AQD
P.O. Box 30473
Lansing, Michigan 48909-7973

Ms. Heidi Hollenbach
Michigan Department of Environment Quality
Air Quality Division
State Office Building, 6th Floor
350 Ottawa Ave. NW, Unit 10
Grand Rapids, Michigan 49503-2341