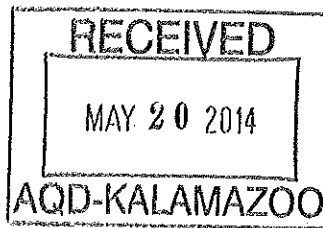




Aleris International, Inc.  
25825 Science Park Drive  
Beachwood, OH 44122  
www.aleris.com



May 19, 2014

Mr. Rex Lane  
Michigan Department of Environmental Quality  
7953 Adobe Road  
Kalamazoo, MI 49009

Dear Mr. Lane:

I am in receipt of your Violation Notice dated April 22, 2014 addressed to Mr. Joe Russell. This letter will provide the requested response.

I want to thank you for the extension of time until May 20, 2014 for providing a response.

The cited incident involves an engineering study performed between February 10, 2014 and February 14, 2014. The engineering study was performed per PTI No. 76-12A. The PM<sub>2.5</sub> emission level of 0.367 pounds/ton charged exceeded the limit of 0.292 pounds/ton charged.

The engineering study was followed with a compliance test between February 17, 2014 and February 19, 2014. This test report was submitted March 4, 2014. The test included two sets of conditions, totaling six test runs. The facility was successful in meeting the PM<sub>2.5</sub> emission limit with Runs 1 through 3. This was achieved by eliminating a dross designated XAMW-DR380E-F from the materials charged to the rotary furnaces.

In order to remain in compliance with the PM<sub>2.5</sub> emission limits, the following corrective actions have been taken.

1. The dross identified as XAMW-DR380E-F will not be run at Aleris Recycling, Inc., Coldwater, MI until compliance is demonstrated through additional emission testing.
2. A Permit to Install Application dated May 9, 2014 addressed to Ms. Mary Ann Dolehanty was submitted requesting a permit revision raising short term emission limits for PM<sub>2.5</sub> and PM<sub>10</sub>. The cover letter for the referenced PTI application is attached.

If you have any questions, please call me at 216-910-3697 or via email at [gary.barnett@aleris.com](mailto:gary.barnett@aleris.com).

Sincerely,

A handwritten signature in black ink, appearing to read "G. C. Barnett". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Gary C. Barnett

cc: Ken Willings, Aleris International, Inc., electronically  
Roy Harsch, Drinker, Biddle & Reath LLP, electronically  
Joseph Russell, Aleris Recycling, Inc., electronically  
Matt Houston, Aleris International, Inc., electronically  
Janine Grossheim, Aleris Recycling, Inc., electronically  
Brady Myers, Aleris International, Inc., electronically