

April 12, 2017

Mr. Rex Lane
Michigan Department of Environmental Quality
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, Michigan 49009-5025



Re: Violation Notice Dated March 29, 2017
Issued to Real Alloy Specification, Inc.
SRN N5957, Branch County

Dear Mr. Lane:

On April 4, 2017 the Real Alloy Specification, Inc. (Real Alloy) facility in Coldwater, Michigan received a violation notice, dated March 29, 2017, from your office. The violation notice was issued in response to the results of emissions testing that was conducted February 22– 24, 2017. The associated tests were performed on the reverberatory furnaces EUALFURN7-S1 and EUALFURN8-S1 and their respective flue baghouse collectors at the North Plant located at 368 West Garfield Avenue, Coldwater, Michigan. As referenced in the violation notice, the stack test report forwarded to the Air Quality Division (“AQD”) by Real Alloy on March 22, 2017 showed nitrogen oxides (NOx) emissions in excess of the limits in Michigan Renewable Operating Permit (ROP) MI-ROP-5957-2012e, Permit to Install (PTI) No. 109-16, Conditions I.47 and I.59.

Due to the unexpected results of the NOx emissions test, Real Alloy is currently working with our air permitting consultant, GHD to prepare an application to modify the PTI/ROP to raise the nitrogen oxides (NOx) limits and re-combine the existing individual furnace flue emission limits into a single location at the combined flue baghouse stack. These increased NOx emission rates will trigger modeling requirements but will not exceed the significance thresholds for PSD/NSR permitting.

Additionally, an error in the assigned limit for HCl on EUALFURN1-S1 has been discovered as part of this effort by GHD. Real Alloy would like to have this corrected in the revised PTI issued by the MDEQ as a result of this request. We expect this permit application to be submitted to MDEQ Permit Section by May 15, 2017, and a draft PTI issued by August 31, 2017.

If you have any questions regarding this response, please contact Jeff Ferg at the following telephone number: (216) 755-8822, or email address Jeff.Ferg@realalloy.com.

**REAL ALLOY SPECIFICATION, INC.
368 WEST GARFIELD AVENUE
COLDWATER, MICHIGAN 49036**

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Sincerely,



Greg Hall
Plant Manager

cc: Andy Jennings, Real Alloy – Corporate HSE
Jeff Ferg, Real Alloy – Corporate HSE
Brady Myers, Real Alloy – Corporate HSE
Janine Grossheim, Real Alloy – Coldwater
Lynn Fiedler – MDEQ
Mary Ann Dolehanty – MDEQ
Christopher Ethridge – MDEQ
Thomas Hess – MDEQ
Mary Douglas – MDEQ

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