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

Re: Violation Notice Dated September 26, 2017 Issued to Real Alloy Recycling, Inc. SRN N5957, Branch County

Dear Mr. Lane:

The Real Alloy Recycling, Inc. facility in Coldwater, Michigan ("facility") received a violation notice, dated September 26, 2017, from your office. The violation notice was issued for incidents that occurred on September 26, 2016 and June 23, 2017 where the 8-hour lime check was missed on the rotary furnace baghouse and the reverbatory furnace baghouse due to lack of personnel. As referenced in the violation notice, both incidents were reported in the Semi-annual Excess Emissions/Summary Reports.

The Company promptly completed a thorough investigation of the incidents. The previous reported Semi-annual Excess Emissions/Summary Reports stated corrective actions would involve additional checks by the Production Supervisor would be implemented to ensure the 8-hour checks are completed as required. During an upset condition where there is a lack of maintenance personnel on staff to complete the required 8-hour lime checks, the Production Supervisor will continue to complete the required lime checks. Also, Real Alloy Specification, Inc. (Coldwater North Facility) maintenance personnel will be contacted to support until maintenance personnel is onsite. Additionally, communication will be sent to notify management team members of the absence of maintenance personnel for any additional support that may be needed.

If you need additional information or have any questions related to this parameter deviation, please contact me at your earliest convenience at (517) 279-4041.

Sincerely,

Kerry Strange

Plant Manager



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