

April 21, 2023

Via email to: crossa3@michigan.gov

Ms. Amanda Cross
State of Michigan
Department of Environment, Great Lakes and Energy
Air Quality Division, Kalamazoo District
7953 Adobe Road
Kalamazoo, Michigan 49009

**RE: Real Alloy Recycling, LLC
267 Filmore Road, Coldwater, Michigan
Violation Notice N5957-VN-20230406
Renewable Operating Permit (ROP) number MI-ROP-N5957-2022**

Dear Ms. Cross:

This letter is in response to Violation Notice (VN) N5957-VN-20230406, dated April 6, 2023, for the Real Alloy Recycling, LLC (Real Alloy) facility located in Coldwater, MI.

The VN is in response to the 2022 ROP Annual and Semi-Annual Certification submitted to EGLE on March 13, 2023. On the ROP, the Facility reported that the 5-year deadline for source EUIMROTFURN1/2 (Flexible Group ID: FGMACTRRR) has lapsed as of October 12, 2022.

Information requested in the VN is provided below.

Date(s) the Violation Occurred: 10/12/2022

Explanation of the Causes and Duration of the Violation: As more fully explained in Real Alloy's February 28, 2023 letter request to EGLE for enforcement discretion, conflicting stack testing provisions and Real Alloy's interpretation regarding relevant stack testing deadlines for source EUIMROTFURN1/2, when comparing the former ROP (2016) and recently issued ROP (2022), resulted in a missed testing deadline as of 10/12/2022.

Whether the Violation is Ongoing: This one-time violation occurred on 10/12/2022.

Summary of the Actions that have been taken and are proposed to be taken to correct the violation: Real Alloy has worked to schedule these tests as soon as feasible.

Dates by which these actions will take place: Testing of source EUIMROTFURN1/2 is scheduled for July 2023.

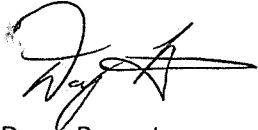
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Steps being taken to prevent a reoccurrence: Real Alloy has updated the compliance testing deadline for source EUIMROTFURN1/2, per the current ROP, to ensure timely testing in the future.

Regards,

A handwritten signature in black ink, appearing to read 'Doug Bryant', with a long horizontal flourish extending to the right.

Doug Bryant
Plant Manager

cc (via email): Cathy Griffin – Real Alloy Recycling, LLC, Beachwood, OH
Andy Jennings – Real Alloy Recycling, LLC, Beachwood, OH
Jennifer Zavoda – Real Alloy Recycling, LLC, Beachwood, OH
David Likens – Real Alloy Recycling, LLC, Coldwater, MI

cc (hcopy): Jenine Camilleri – EGLE Enforcement Unit Supervisor, Lansing, MI