



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

FEB 20 2019

Bruno L. Pigott
Commissioner

Gary Huddleston, Environmental Manager
Real Alloy Specification, LLC
4525 U.S. 24 Business
Wabash, IN 46992

Re: Inspection Summary/Violation Letter
Real Alloy Specification
Plant ID 169-00010
Wabash, Wabash County

Dear Mr. Huddleston:

On February 6, 2019, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of Real Alloy Specification, LLC, located at 4525 U.S. 24 Business in Wabash, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

- Type of Inspection:
- ☒ Commitment
 - ☐ Surveillance
 - ☐ Complaint
 - ☐ Other
- Results of Inspection:
- ☐ No violations were observed.
 - ☒ Violations were observed.
 - ☐ Violations were observed but corrected during the inspection.
 - ☐ Additional information/review is required to evaluate overall compliance.
 - ☐ Violations were observed and will result in an enforcement action.

Discussions during the inspection and review of the 40 CFR Subpart RRR semiannual report for the first half of 2018 revealed that Real Alloy Specification, LLC:

- 1) Exceeded its per-heat Total Reactive Flux Input Rate (TRFIR) limit for two heats beginning 4/6/2018 and 6/8/2018 in violation of 40 CFR 63.1506(m)(5). TRFIR exceedances are addressed in the Agreed Order for Case 2018-25145-A. The TRFIR exceedances beginning 4/6/2018 and



6/8/2018 occurred before the Agreed Order was adopted on October 25, 2018.

- 2) Exceeded the 196°F inlet temperature limit for the West Furnace Baghouse for a 6 hour period beginning 4/7/2018 in violation of 40 CFR 63.1506(a)(4) and Table 2 of NESHAP Subpart RRR.

Within thirty (30) days of the date of this letter, further details must be submitted to this office concerning the West Furnace Baghouse inlet temperature exceedance beginning 4/7/2018, including the peak temperature and the peak 3-hour average temperature reached during the exceedance. The required submittal should be mailed to:

Wyman Clark, Compliance Inspector
Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

Failure to respond adequately to this Violation Letter may result in a referral for formal enforcement action. Please direct any questions to Wyman Clark, Compliance Inspector, at 317-232-8441 or by email at wclark@idem.in.gov.

In addition, it has come to IDEM's attention that Electric Crusher #2 has been removed from the site. This leads to confusion about continuing testing requirements for that emissions unit. You are advised to apply for a permit modification to remove this device and its testing requirements from the permit. The required permitting forms and instructions can be found at www.IN.gov/idem/5157.htm. Your application should contain the following:

- A brief cover letter stating the reason for the application;
- Air Permit Application Cover Sheet, (signed) State Form #50639; and,
- GSD-01 General Source Data – Basic Source Level Information, State Form #50640;
- In addition, you should complete and submit all forms applicable to the specific processes at your facility.

IDEM's Compliance and Technical Assistance Program (CTAP) offers free, confidential compliance assistance to regulated entities. CTAP can be reached at (317) 232-8172 or visit CTAP's website at www.idem.IN.gov/ctap. The complete air permit application should be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

Sincerely,



Janusz Johnson, Section Chief
Air Compliance Section 1
Office of Air Quality

ACES ID: 232911 (Inspection), 232965 (Violation)

cc: Wabash County Health Department
Wyman Clark, Air Compliance Section 1, Office of Air Quality