



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 23 2009

REPLY TO THE ATTENTION OF:

AE-17J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Todd Siebenaler, Plant Manager
Spectro Alloys Corporation
13220 Doyle Path
Rosemount, Minnesota 55068

Re: Notice and Finding of Violation at Spectro Alloys Corporation, Rosemount,
Minnesota

Dear Mr. Siebenaler:

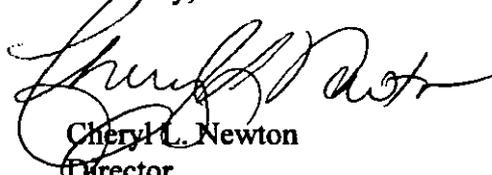
This is to advise you that the U. S. Environmental Protection Agency has determined that the Spectro Alloys (Spectro) facility at 13220 Doyle Path, Rosemount, Minnesota is in violation of the Clean Air Act (CAA), 42 U.S.C. § 7412, the Minnesota State Implementation Plan (SIP), Title V, and associated pollution control requirements. A list of the requirements violated is provided below.

After reviewing Spectro's November 6, 2009 semi-annual excess emission report, EPA finds Spectro to be in violation of its Title V permit, Minnesota SIP requirements at Rule 7019.1000, and CAA regulations implementing the NESHAP at 40 C.F.R. Part 63, Subpart RRR. We are today issuing to you a Notice and Finding of Violation (NOV/FOV) for these violations pursuant to Section 113(a)(3) of the CAA, 42 U.S.C. § 7413(a)(3). This NOV/FOV also indicates that the violations cited in EPA's FOVs of February 26, 2009, and August 3, 2009 constitute violations of Title V of the CAA.

Section 113 of the CAA gives us several enforcement options to resolve these violations, including: issuing an administrative compliance order, issuing an administrative penalty order, bringing a judicial civil action, and bringing a judicial criminal action. EPA is providing you with the opportunity to request a conference with us about the violations alleged in the NOV/FOV. A conference should be requested within 10 days following receipt of this notice and any conference should be held within 30 days following receipt of this notice. This conference will provide you a chance to present information on the identified violations, any efforts you have taken to comply, and the steps you will take to prevent future violations. Please plan for your facility's technical and management personnel to take part in these discussions. You may have an attorney represent you at this conference.

The EPA contact in this matter is Gina Harrison. You may call her at (312) 353-6956 if you wish to request a conference. EPA hopes that this NOV/FOV will encourage Spectro's compliance with the requirements of the CAA.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl L. Newton". The signature is fluid and cursive, with a large initial "C" and "N".

Cheryl L. Newton
Director
Air and Radiation Division

**United States Environmental Protection Agency
Region 5**

IN THE MATTER OF:)	
)	
Spectro Alloys)	NOTICE OF VIOLATION and
Rosemount, Minnesota)	FINDING OF VIOLATION
)	
)	EPA-5-10-MN-05
Proceedings Pursuant to)	
the Clean Air Act,)	
42 U.S.C. §§ 7401 <i>et seq.</i>)	

NOTICE AND FINDING OF VIOLATION

This Notice and Finding of Violation is issued pursuant to Section 113 (a)(3) of the Clean Air Act (CAA), 42 U.S.C. § 7413 (a)(3). The U.S. Environmental Protection Agency finds that Spectro Alloys (Spectro) is violating its Title V Permit, the Minnesota State Implementation Plan (SIP), and CAA and National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production at 40 C.F.R. part 63, Subpart RRR, as promulgated pursuant to Section 112 of the Act, 42 U.S.C. § 7412.

Minnesota SIP Regulations

1. On May 24, 1995, EPA approved Rules 7019.1000 and 7005.0100 as part of the federally enforceable SIP for Minnesota. 60 Fed.Reg. 27411. 40 CFR 52.1220(c).
2. Minnesota SIP Rule 7019.1000, Subpart 2 requires a source to notify the Commissioner of the Minnesota Pollution Control Agency (MPCA) within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The rule additionally requires that at the time of notification or as soon thereafter as possible, the owner or operator shall also notify the Commissioner of the cause of the breakdown and the estimated duration.
3. Minnesota SIP Rule 7005.0100 Subpart 4 defines "breakdown" as a sudden and unavoidable failure of air pollution control equipment or process equipment to operate as designed.

NESHAP Regulations

4. Under Section 112 of the CAA, the Administrator of EPA promulgated the NESHAP for Secondary Aluminum Production at 40 C.F.R. Part 63, Subpart RRR; 40 C.F.R. § 63.1500 *et seq.*
5. A group 1 furnace, as that term is defined at 40 C.F.R. § 63.1503, means a furnace of any design that melts, holds, or processes aluminum that contains paint, lubricants, coatings, or other foreign materials with or without reactive fluxing, or processes clean charge with reactive fluxing.
6. Pursuant to the NESHAP at 40 C.F.R. § 63.1501, the owner or operator of an existing affected source must comply with the requirements of Subpart RRR by March 24, 2003; and the owner or operator of a new affected source that commences construction or reconstruction after February 11, 1999, must comply with the requirements by March 24, 2000, or upon startup, whichever is later.
7. The NESHAP, at 40 C.F.R. § 63.1506 (a), requires the owner or operator to operate all new and existing affected sources and control equipment according to the requirements in 40 C.F.R. § 63.1506.
8. The NESHAP, at 40 C.F.R. § 63.1510 (g) (1) and (2), requires that the owner or operator of an affected source using an afterburner to comply with the requirements of Subpart RRR must install, calibrate, maintain, and operate a device to continuously monitor and record the operating temperature of the afterburner and, among other things, the temperature monitoring system must record temperature in 15-minute block averages and determine and record the average temperature for each 3-hour block period.
9. The NESHAP, at 40 C.F.R. § 63.1510 (g)(3), requires that the owner or operator of an affected source using an afterburner to comply with the requirements of Subpart RRR must conduct an inspection of each afterburner at least once a year and record the results.
10. The NESHAP, at 40 C.F.R. § 63.1506 (g)(1)(i), requires that each owner or operator of an affected scrap dryer/delacquering kiln/decoating kiln with emissions controlled by an afterburner maintain the 3-hour block average operating temperature of each afterburner at or above the average temperature established during the performance test.
11. The NESHAP, at 40 C.F.R. § 63.1510 (h)(1), requires each owner or operator of an affected scrap dryer/delacquering kiln/decoating kiln or a group 1 furnace using a lime-injected fabric filter install, calibrate, maintain, and operate a device to continuously monitor and record the temperature of the fabric filter inlet gases.
12. The NESHAP, at 40 C.F.R. § 63.1510 (f), requires that each owner or operator of an affected source or emission unit using a fabric filter or lime-injected fabric filter to comply with the requirements of Subpart RRR must install, calibrate, maintain, and continuously operate a bag leak detection system.

13. The NESHAP, at 40 C.F.R. § 63.1506 (g)(4) and 40 C.F.R. § 63.1506 (m)(3), requires each owner or operator of an affected scrap dryer/delacquering kiln/decoating kiln or group 1 furnace with emissions controlled by a lime-injected fabric filter to maintain the 3-hour block average inlet temperature for each fabric filter at or below the average temperature established during the performance test, plus 25°F.
14. The NESHAP, at 40 C.F.R. § 63.1517 (b)(5), requires that each owner or operator of an affected group 1 furnace must maintain records of 15-minute block average weights of gaseous or liquid reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous or liquid or solid flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken.
15. The NESHAP, at 40 C.F.R. § 63.1505 (e)(iv), provides that owners or operators of affected scrap dryers/delacquering kilns/decoating kilns which are equipped with an afterburner must not discharge or cause to be discharged to the atmosphere emissions in excess of 0.75 kg of hydrochloric acid (HCl) per Mg (1.50 lb per ton) of feed/charge.
16. The NESHAP, at 40 C.F.R. § 63.1511 (e), requires that each owner or operator of affected sources and emission units located at secondary aluminum production facilities that are major sources must conduct a performance test every 5 years following the initial performance test.
17. The NESHAP, at 40 C.F.R. § 63.1512 (c), requires that each owner or operator of affected scrap dryers must conduct performance tests to measure emissions of total hydrocarbons (THC), dioxins and furans (D/F), (HCl), and particulate matter (PM) at the outlet of the control device.
18. The NESHAP, at 40 C.F.R. § 63.1506 (m)(5), requires that each owner or operator of an affected group 1 furnace with emissions controlled by a lime-injected fabric filter must maintain the total reactive chlorine flux injection rate for each operating cycle or time period used in the performance test at or below the average rate established during the performance test.
19. The NESHAP, at 40 C.F.R. § 63.1518 states that the requirements of the general provisions in 40 C.F.R. Part 63, Subpart A which are applicable to the owner or operator subject to 40 C.F.R. Part 63, Subpart RRR are shown in Appendix A to 40 C.F.R. Part 63, Subpart RRR.
20. Appendix A to 40 C.F.R. Part 63, Subpart RRR indicates that 40 C.F.R. § 63.8 (c)(4) applies to those subject to 40 C.F.R. Part 63, Subpart RRR.
21. The NESHAP, at 40 C.F.R. § 63.8 (c)(4), provides that with the exception of system breakdowns, repairs, calibration checks, and zero and span adjustments required, all continuous monitoring systems shall be in continuous operation and shall meet minimum frequency of operation requirements.

22. The NESHAP, at 40 CFR § 63.1506 (c)(1), requires each affected source to design and install a system for the capture and collection of emissions to meet the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in chapters 3 and 5 of "Industrial Ventilation: A Manual of Recommended Practice" (incorporated by reference in 40 C.F.R. § 63.1502 of this subpart).
23. The NESHAP, at 40 C.F.R. § 63.1510 (d)(2), requires each affected source to inspect each capture and collection system at least once each calendar year to ensure that each system is operating in accordance with the operating requirements in § 63.1506 (c) and record the results of each inspection.
24. The NESHAP, at 40 C.F.R. § 63.1505 (e)(1)(iii), provides that owners or operators of affected scrap dryers/delacquering kilns/decoating kilns equipped with an afterburner having a design residence time of at least 1 second and operating the afterburner at a temperature of at least 760 °C (1400 °F) at all times limit D/F emissions to 5.0 µg of D/F TEQ per Mg (7.0 × 10⁻⁵gr of D/F TEQ per ton), as an alternative to the general limit of 0.25 µg of D/F TEQ per Mg (3.5 × 10⁻⁶gr of D/F TEQ per ton) of feed/charge.
25. The NESHAP, at 40 C.F.R. § 63.1518, states that the requirements of the general provisions in 40 C.F.R. Part 63, Subpart A which are applicable to the owner or operator subject to 40 C.F.R. Part 63, Subpart RRR are shown in Appendix A to 40 C.F.R. Part 63, Subpart RRR.
26. Appendix A to 40 C.F.R. Part 63, Subpart RRR states that 40 C.F.R. § 63.8 (c)(4) applies to those subject to 40 C.F.R. Part 63, Subpart RRR.
27. The NESHAP, at 40 C.F.R. § 63.6(e)(1)(i), requires that at all times, including periods of startup, shutdown, and malfunction, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

Title V Regulations

28. Section 502(d)(1) of the Act, 42 U.S.C. § 7661a(d)(1), requires each State to develop and submit to EPA an operating permit program which meets the requirements of Title V. EPA granted interim approval to Minnesota's Title V program on June 16, 1995, effective July 16, 1995. 60 Fed. Reg. 31637. EPA proposed final approval of Minnesota's Title V program on October 30, 2001. 66 Fed. Reg. 54739. EPA granted Minnesota final approval of its Title V Clean Air Act Permit Program, effective November 30, 2001. 66 Fed. Reg. 62967. 40 C.F.R. Part 70, Appendix A.
29. MPCA issued a Total Facility Operating Permit 03700066-001 to Spectro on June 15, 1995, and final Title V Permit 03700066-001 to Spectro on April 22, 2005.

30. Spectro's Permit 03700066-001 incorporates by reference Minnesota SIP Rule 7019.1000 in Table A.
31. Spectro's Permit 03700066-001 incorporates by reference the NESHAP for secondary aluminum production in Table A.
32. 40 C.F.R § 70.3 provides that the requirements of Part 70 apply to any major source located in a state that has received whole or partial approval of its Title V program.

Factual Background

33. At all times relevant to this notice, Spectro Alloys Corporation has owned and operated a secondary aluminum production facility at 13220 Doyle Path, Rosemount, Minnesota. Spectro Alloys Corporation uses aluminum scrap and dross in its aluminum production processes.
34. At the facility, Spectro owns and operates two furnaces and two scrap dryers which were constructed prior to February 11, 1999, known as Furnaces #1 and #3 and Scrap Dryers #1 and #3.
35. Spectro Alloys Corporation's facility is an emission source subject to the requirements of the Act, including 40 C.F.R. Part 63, Subpart RRR.
36. The facility is a "major source" as that term is defined at 40 C.F.R. § 63.2.
37. Spectro's Furnaces #1 and #3 and Scrap Dryers #1 and #3 are "group 1 furnaces" and "scrap dryers" respectively, as those terms are defined at 40 C.F.R. § 63.1503. The group 1 furnaces use a chlorine flux to reduce the amount of magnesium in the product and are vented to a common control device.
38. Spectro's Furnaces #1 and #3 are equipped with a "fabric filter" and use "lime-injection" as those terms are defined at 40 C.F.R. § 63.1503.
39. Spectro's Scrap Dryers #1 and #3 are equipped with an "afterburner" and "fabric filter," and use "lime-injection" as those terms are defined at 40 C.F.R. § 63.1503.
40. The average baghouse inlet temperature established during Spectro's February 11-14, 2003 performance test of Scrap Dryer #1 plus 25°F was 395°F, and the average afterburner operating temperature established during this test was 1456°F.
41. The average baghouse inlet temperature established during Spectro's February 11-14, 2003 performance test of Furnaces #1 and #3 plus 25°F was 167°F, and the maximum reactive chlorine flux injection rate established during this test was 1157 lbs/hr.
42. The average baghouse inlet temperature established during Spectro's February 5-6, 2004

performance test of Scrap Dryer #1 plus 25°F was 426°F, and the average afterburner operating temperature established during this test was 1450°F.

43. The average baghouse inlet temperature established during Spectro's March 4, 2004 performance test of Furnaces #1 and #3 was 227°F, and the maximum reactive chlorine flux injection rate established during this test was 955 lbs/hr.
44. The average baghouse inlet temperature established during Spectro's July 1-2, 2004 performance test of Scrap Dryer #1 was 404°F and the average afterburner operating temperature established during this test was 1499°F.
45. The average baghouse inlet temperature established during Spectro's August 29, 2006 performance test of Furnaces #1 and #3 was 268°F, and the maximum reactive chlorine flux injection rate established during this test was 1082 lbs/hr.
46. The average baghouse inlet temperature established during Spectro's May 1-2, 2007 performance test of Furnaces #1 and #3 was 220°F, and the maximum reactive chlorine flux injection rate established during this test was 941 lbs/hour.
47. The average baghouse inlet temperature established during Spectro's January 29-31, 2008 performance test of Scrap Dryer #3 was 405°F and the average afterburner operating temperature established during this test was 1450°F.
48. In accordance with its permit and the NESHAP at 40 C.F.R. 63.1511 (e), Spectro conducted a performance test on Scrap Dryer #1 on February 3-4, 2009, and submitted a test report to EPA and MPCA on March 16, 2009. Results of this test showed HCl emissions of 1.58 lbs/ton of feed/charge.
49. The average baghouse inlet temperature established during Spectro's June 30-July 1, 2009 performance test of Furnaces #1 and #3 was 131°F, and the maximum reactive chlorine flux injection rate established during this test was 823 lbs/hr. The average baghouse inlet temperature established during Spectro's June 30-July 1, 2009 performance test of Scrap Dryer #1 plus 25°F was 382°F, and the average afterburner operating temperature established during this test was 1520°F.
50. EPA sent an information request to the facility on May 21, 2008, February 26, 2009, and May 18, 2009. Among other things, EPA required Spectro to send afterburner inspection records and copies of previously submitted semi-annual excess emission and startup, shutdown, malfunction (SSM) reports. EPA also required Spectro to demonstrate that the capture and collection systems on Furnaces #1 and #3 meet engineering standards for minimum exhaust rates, using procedures prescribed by the American Conference of Governmental Industrial Hygienists in chapters 3 and 5 of "Industrial Ventilation: A Manual of Recommended Practice."
51. In its May 18, 2009 response to EPA, Spectro indicated it had not retained records of its

2008 afterburner inspection. Spectro also submitted copies of all semi-annual excess emission and startup, shutdown, and malfunction reports submitted to MPCA and EPA for the period March 23, 2004, to September 23, 2007. These reports include monitoring results for several parameters including afterburner and fabric filter inlet temperatures and chlorine flux injection rates.

52. Chapters 3 and 5 of "Industrial Ventilation: A Manual of Recommended Practice" specify that the airflow velocity through any openings in enclosure hoods, tested using EPA Method 2, should exceed or be in the range of 150-200 feet per minute (fpm) in aluminum furnaces.
53. The average afterburner temperature established during Spectro's January 29-31, 2008 performance test of Scrap Dryer #3 was 1499°F.
54. The average fabric filter inlet temperature established during Spectro's January 29-31, 2008 performance test was 379°F for Scrap Dryer #1, and 370°F for Scrap Dryer #3.
55. The average fabric filter inlet temperature established during Spectro's May 2, 2007 performance test was 195°F for group 1 Furnaces #1 and #3.
56. The average reactive chlorine flux injection rate established during Spectro's May 2, 2007 performance test of group 1 Furnaces #1 and #3 was 955 lbs/hr.
57. In its June 17, 2008 response to EPA, Spectro submitted results of capture and collection system testing on Furnaces 1 and 3 and airflow velocity calculations pursuant to EPA's information request. These calculations did not include calculated area from open access doors. Testing was performed only at open areas around feed conveyors, other penetrations, and access door perimeter cracks and yielded values of 329 fpm for Furnace #1, and 395 fpm for Furnace #3.
58. In its August 4, 2008 response to EPA, Spectro submitted results of capture and collection system testing on Furnaces #1 and #3 and airflow velocity calculations pursuant to EPA's information request. Testing was performed with all access doors open and yielded values of 36 fpm for Furnace #1, and 70 fpm for Furnace #3.
59. In its May 22, 2008 semi-annual excess emission and startup, shutdown, malfunction (SSM) report, Spectro reported monitoring results for several parameters including afterburner and fabric filter inlet temperatures and chlorine flux injection rates for the period September 23, 2007 to March 23, 2008.
60. In its November 18, 2008 semi-annual excess emission and SSM report, Spectro reported monitoring results for several parameters including afterburner and fabric filter inlet temperatures and chlorine flux injection rates for the period March 23, 2008 to September 23, 2008.
61. On February 26, 2009, and August 3, 2009, EPA issued Findings of Violation to Spectro,

citing Spectro for violations of emissions standards and operational requirements.

62. Spectro submitted its March 2009 – September 2009 semi-annual excess emission and SSM report to MPCA and EPA on November 6, 2009.
63. In its November 6, 2009 semi-annual SSM report, Spectro reported results of a February 17-18, 2009 engineering test conducted on Scrap Dryer #1. Results of this test showed average D/F emissions of 7.52 E-05 gr/ton and a single test result of 1.79 E-04 gr/ton for Run 3. According to the Charge Rate Data provided in the engineering test summary, Run 3 was performed for a total of 3.17 hours.

Violations of Emission Standards and Monitoring Requirements

64. Spectro's excess dioxin and furan emissions from Scrap Dryer #1 are violations of its Title V permit and 40 C.F.R. § 63.1505 (e)(1)(iii).
65. Spectro's failure to immediately report the D/F emissions exceedance to MPCA is a violation of its Title V permit and the Minnesota SIP at 7019.1000.
66. Spectro's excess HCl emissions from Scrap Dryer #1 are violations of its Title V permit.
67. Spectro's failure to maintain records of 2008 afterburner inspection results is a violation of its Title V permit.
68. Spectro failed to demonstrate that the capture and collection systems on Furnaces #1 and #3 were designed and installed to meet the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in chapters 3 and 5 of "Industrial Ventilation: A Manual of Recommended Practice," in violation of its Title V permit.
69. Spectro failed to annually inspect the capture and collection systems on Furnaces #1 and #3, according to procedures outlined in chapters 3 and 5 of "Industrial Ventilation: A Manual of Recommended Practice," to ensure that each system is operating in accordance with the operating requirements set forth in its Title V permit, in violation of its Title V Permit.
70. From March 23, 2004 - March 23, 2007, Spectro's afterburner data recorders for Scrap Dryer #1 and #3 failed on 497 occasions causing the operating temperature of the afterburner not to be recorded and from September 23, 2007 to September 23, 2008, Spectro's Scrap Dryer #3 afterburner data recorder malfunctioned on 27 occasions causing the operating temperature of the afterburner not to be recorded, in violation of its Title V permit.
71. From March 23, 2004 - March 23, 2007, Spectro's afterburner data recorders for Scrap Dryers #1 and #3 recorded 400 instances of temperature excursions and from September 23, 2007 to September 23, 2008, Spectro's afterburner data recorders for Scrap Dryers #1 and

#3 recorded 21 instances of temperature excursions, in violation of its Title V permit.

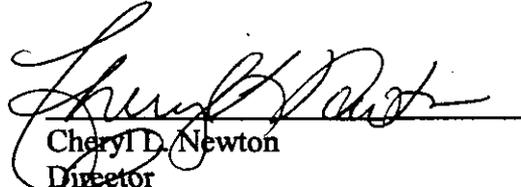
72. From September 23, 2007 to September 23, 2008, Spectro's fabric filter inlet temperature recorder for Scrap Dryer #3 malfunctioned on 27 occasions causing the fabric filter inlet temperature not to be recorded, in violation of its Title V permit.
73. From September 23, 2007 to September 23, 2008, Spectro's fabric filter inlet temperature recorder for Furnaces #1 and #3 malfunctioned on 52 occasions causing the fabric filter inlet temperature not to be recorded, in violation of its Title V permit.
74. From March 23, 2004 - March 23, 2007, Spectro recorded 7,851 instances when the fabric filter inlet temperatures for Furnaces #1 and #3 were greater than applicable limits and from September 23, 2007 to September 23, 2008, Spectro recorded 76 instances when the fabric filter inlet temperatures for Furnaces #1 and #3 were greater than 220°F, in violation of its Title V permit.
75. From March 23, 2004 - March 23, 2007, Spectro's Furnaces #1 and #3 chlorine injection data recorder failed on 58 occasions causing the rate of reactive flux injection not to be recorded and from September 23, 2007 to September 23, 2008, Spectro's Furnaces #1 and #3 chlorine injection data recorder malfunctioned on numerous occasions causing the rate of reactive flux injection not to be recorded, in violation of its Title V permit.
76. From March 23, 2004 - March 23, 2007, Spectro recorded 37 instances when chlorine injection rates for Furnaces #1 and #3 were greater than applicable limits for 3-hour block averages, and from September 23, 2007 to September 23, 2008, Spectro recorded 68 instances when chlorine injection rates for Furnaces #1 and #3 were greater than 955 lbs/hr for 3-hour block averages, in violation of its Title V permit.
77. From March 23, 2004 - March 23, 2007, Spectro's fabric filter temperature recorders for Scrap Dryer #1 and #3 failed on 497 occasions causing the operating temperature of the baghouse not to be recorded, in violation of its Title V permit.
78. From March 23, 2004 - March 23, 2007, Spectro recorded 243 instances when the fabric filter inlet temperatures for Scrap Dryers #1 and #3 were greater than applicable limits, in violation of its Title V permit and 40 C.F.R. § 63.1506 (g)(4).
79. From March 23, 2004 - March 23, 2007, Spectro's bag leak detection monitors failed on more than 1,721 occasions causing bag leaks not to be detected or recorded at Scrap Dryers #1 and #3 and the Hammermill, in violation of its Title V permit, 40 C.F.R. § 63.1510 (f) and 40 C.F.R. § 63.8 (c)(4).

Environmental Impact of Violations

80. Excess emissions of dioxins and furans increases public exposure to potentially life-threatening mutagens and carcinogens. Long term exposure to dioxin has additionally been

linked to many health problems, including birth defects, inability to maintain pregnancy, decreased fertility, reduced sperm counts, endometriosis, diabetes, learning disabilities, immune system suppression, lung problems, skin disorders, and lowered testosterone levels.

12/22/09
Date


Cheryl D. Newton
Director
Air and Radiation Division

CERTIFICATE OF MAILING

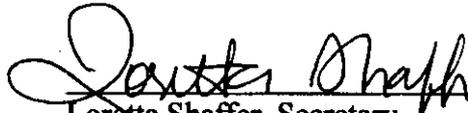
I, Loretta Shaffer, certify that I sent a Notice and Finding of Violation, No. EPA-5-10-MN-05, by Certified Mail, Return Receipt Requested, to:

Todd Siebenaler, Plant Manager
Spectro Alloys
13220 Doyle Path
Rosemount, Minnesota 55068

I also certify that I sent copies of the Notice of Violation and Finding of Violation by first class mail to:

Katie Koelfgen, Air Compliance and Enforcement Unit Supervisor
Minnesota Pollution Control Agency
520 Lafayette Road
St. Paul, Minnesota 55155-4194

on the 28 day of December, 2009.



Loretta Shaffer, Secretary
AECAS, MN/OH

CERTIFIED MAIL RECEIPT NUMBER: 7001 0320 0006 0192 0836