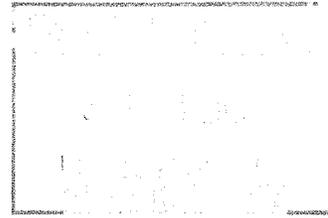


Aleris  
Aleris Specialty Products, Inc.



May 31, 2012

Mr. Bryan Sokolowski  
Cleveland Division of Air Quality  
75 Erievue Plaza 2<sup>nd</sup> Floor  
Cleveland, Ohio 44114-1839

Re: Notice of response to Violation letter issued to Aleris Specialty Products, Inc.  
Facility ID No. 13-18-00-0062.

Dear Mr. Sokolowski:

On May 29<sup>th</sup>, 2012, Aleris Specialty Products, Inc. located at 4181 Bradley Road Cleveland, Ohio received an Inspection Summary Letter/ Violation Letter from the Cleveland Division of Air Quality. This letter indicated that during the visit on May 8<sup>th</sup> 2012 observations were made that excessive fugitive dust emissions were escaping from multiple areas of Emission Unit (EU) F008: Aluminum Dross Unloading and Handling/Aluminum Dross Dumping Area, which is in violation of Permit-to-Install # 13-1858. Within 14 days of receiving the notice of violation, the facility was requested to submit in writing the corrective actions taken to improve and correct the existing Dross Dumping practices.

This correspondence is being submitted to CDAQ to provide information of our corrective actions that have been indicated in the NOV.

As explained in the Summary Letter, there were fugitive dust emissions escaping from openings in our building. Once we received a verbal notice of violation on May 8<sup>th</sup> 2012 we stopped all material handling activities immediately so that we could examine the building for openings and gaps that would require structural repair.

As a corrective action, we have made the necessary structural repairs to the building including covering all openings that were identified from the inspections with tarps. We also changed our truck loading process by requiring all truck drivers to pull completely inside the building while being loaded. This allowed us to capture any fugitive emissions that would have escaped out of the loading dock opening. In addition to this, we had our Regional HSE Engineer on site to monitor all remaining truck loading activity to ensure permit compliance.

4181 Bradley Road  
Cleveland, Ohio 44109  
Phone (216)-661-1483 Fax (216)459-1077

## Aleris Specialty Products, Inc.

As of May 17<sup>th</sup> 2012 the Aleris Specialty Product, Inc. site located on 4181 Bradley Road Cleveland, Ohio has stopped all operations and idled the facility.

I would also like to inform the CDAQ for your records that Mr. Tom Fries is no longer the Responsible Official to the Cleveland, Ohio site. Phil Brown has taken over this role as the most recent appointed Plant Manager.

We anticipate that the violations that were identified from the inspection have been adequately addressed by this correspondence. If you require any further information, please contact Chris Bradley at the following contact number: (440)-281-3506 or email address: Chris Bradley@aleris.com

Sincerely,



Phil Brown  
Plant Manager

cc: James Buckert  
Chris Bradley  
Ray Kovacs

4181 Bradley Road  
Cleveland, Ohio 44109  
Phone (216)-661-1483 Fax (216)459-1077



**City of Cleveland**  
Frank G. Jackson, Mayor

Department of Public Health  
Division of Air Quality  
75 Erieview Plaza, Second Floor  
Cleveland, Ohio 44114-1839  
216/664-2297 • Fax: 216/420-8047  
www.clevelandhealth.org

**SERVING OHIO EPA AS AGENCY 13  
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL 7010 1870 0000 6591 4858  
RETURN RECEIPT REQUESTED**

June 12, 2012

Phil Brown  
Plant Manager  
Aleris Specialty Products, Inc.  
4181 Bradley Road  
Cleveland, Ohio 44109

**FACILITY ID: 13-18-00-0062**

**RETURN TO COMPLIANCE  
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Mr. Brown:

On May 8, 2012, the Cleveland Division of Air Quality (CDAQ) performed a site visit at Aleris Specialty Products, Inc. (Aleris) located at 4181 Bradley Road in Cleveland. On May 22, 2012, CDAQ issued a Notice of Violation for allowing excessive fugitive dust emissions to escape from multiple areas of Emission Unit (EU) F008: Aluminum Dross Unloading and Handling/Aluminum Dross Dumping Area. CDAQ requested that Aleris submit a detailed corrective action plan stating what steps will be taken to minimize fugitive dust emissions from EU F008.

On June 4, 2012, CDAQ received a response to the violation letter from Aleris. The letter states that Aleris has made the necessary structural repairs to the building including covering all openings that were identified from the inspection with tarps. Aleris also changed the truck loading process by requiring all truck drivers to pull completely inside the building while being loaded.

The corrective action plan was received and appropriate steps were taken to bring the source into compliance. CDAQ has determined that no further enforcement action is warranted at this time, but reserves its right to take such action in the future if necessary.

CDAQ issues this letter with Ohio EPA's concurrence and does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action.



Should you have any questions, please call Bryan Sokolowski at (216) 420-7663. All correspondence with CDAQ must include the Ohio EPA facility identification number for Aleris Specialty Products, Inc.: 13-18-00-0062.

Sincerely,

A handwritten signature in cursive script that reads "Valencia S. White".

Valencia White  
Chief of Enforcement, CDAQ

VW/BS LK

cc: Chris Bradley, Aleris Specialty Products, Inc.  
John Paulian, Ohio EPA Central Office  
William MacDowell, U.S. EPA Region V  
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