FITZGERALD FINISHING

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November 28, 2018

Mr. Jorge Acevedo
State of Michigan
Department of Environmental Quality - Air Quality Division
Detroit Office
3058 West Grand Blvd., Suite 2-300
Detroit, MI 48202-6058

Subject: Reply to Violation Notice dated November 7, 2018
State Registration No. B3037

Dear Mr. Acevedo:

Fitzgerald Finishing LLC (Fitzgerald Finishing) has prepared this document in reply to the Violation Notice (VN) dated November 7, 2018 that was issued by the Michigan Department of Environmental Quality Air Quality Division (MDEQ-AQD). The VN was issued for emission exceedances for flexible group FG-DIPSPINS resulting from a malfunction of the regenerative thermal oxidizer (RTO) emission control device that occurred in April 2017.

The RTO malfunction was reported to the MDEQ-AQD in series of correspondences, including a / an:

- Initial notice (by electronic mail) within one day of the malfunction event.
- 10-day follow-up written notice;
- 30-day follow-up correspondence; and
- Explanation of emission exceedance dated July 27, 2018.

The notices provided to the regulatory agency provide an explanation of the causes of the RTO malfunction, repairs that were made, and corrective actions initiated by Fitzgerald Finishing to minimize air pollutant emissions while the RTO was being repaired. A backup RTO was used from May 2017 until August 2017 when the primary RTO was repaired and placed back into service.

The emission exceedances specified in the VN result from process operations that occurred during the six (6) days in April 2017 between the malfunction of the RTO and startup of the previously used RTO. During this time, production was minimized as much as possible to fulfill critical orders and avoid significant economic hardship to Fitzgerald Finishing's business.

The exceedances of the 12-month rolling total emission rate (tons/year) persisted for 12 months after the RTO malfunction due to the emissions that occurred during the six (6) days in April 2017 (i.e., it was not an on-going emission exceedance).

As presented in the letter dated July 27, 2018, the ceramic heat exchange material within the RTO unit, which was identified as the root cause of the malfunction, has been changed out. The replacement heat exchange material is less prone to local heat buildup (hot spots) that caused the structural failure. In addition, Fitzgerald Finishing has decided to maintain the previously used RTO as a backup in the event of an outage of the primary RTO. If, in the future, the backup RTO is needed, it can be started much quicker than what was experienced in April 2017.

The RTO has operated reliably since it was repaired and restarted in August 2017. We expect that the repairs and continuing to follow the manufacturer's recommendations for operation and preventative maintenance will result in on-going reliable operation of the RTO.

Sincerely,

FITZGERALD FINISHING, LLC

Amanda Davison
EH&S Supervisor

C: Ms. Jenine Camilleri, MDEQ Enforcement Unit