

Fritz Products, Inc.

Plant:
255 Marion Avenue
River Rouge, Michigan 48218
(313) 841-9460



January 8, 2018

Mr. Jon Lamb, Sr. Environmental Quality Analyst
Michigan Department of Environmental Quality (MDEQ)
Air Quality Division (AQD) – Detroit
Cadillac Place
3058 West Grand Blvd., Suite 2-300
Detroit, Michigan 48202-6058

Subject: Violation Notice – SRN: M4547, Wayne County

Dear Mr. Lamb,

We are in receipt of the above Violation Notice (VN) dated December 6, 2017. The VN alleged that Fritz Products, Inc. (FPI) was in violation of various requirements of Michigan Air Pollution Control Rules, 40 CFR 63.11516(b) and 40 CFR 63.10(e)(3)(v), and conditions of Permit To Install (PTI) No. 15-01A. The VN also requested that FEI initiate actions necessary to correct the cited violation and submit a written response to the VN by January 3, 2018.

The following paragraphs will address the alleged cited violations.

- **EUReverbFurnace1**

1. PTI No. 15-01A, S.C. 111.3; R336.1910: Cyclone of the baghouse system was not properly installed and operated at the time of the inspections.

FPI Response

The cyclone is actually a spark arrestor that was installed in the duct prior to the baghouse. The purpose of the spark arrestor is to prevent the filter bags from catching on fire. The spark arrestor was replaced with an identically functional unit in August, 2017. During the AQD's inspection on September 20, 2017, *the newly installed spark arrestor was pointed out to the AQD staff.*

2. PTI No. 15-01A, S.C. VI.2: failure to monitor and record the amount of liquid chlorine used on a pound per ton feed basis.

FPI Response

Fritz maintains records of the weight of both its feed and liquid chlorine use. Consequently Fritz has records of the amount of liquid chlorine used on a pound per ton basis.

- **FGAluminumMelt**

1. PTI No. 15-01A, S.C. IV.1; R336.1910: failure to operate the baghouse system in accordance with the OM&M Plan/MAP. During the inspections, the cyclone was not properly installed and operated, as described in the pollution control equipment for FGAluminumMelt and the OM&M Plan.

FPI Response

The cyclone is actually a spark arrestor that was installed in the duct prior to the baghouse. The purpose of the spark arrestor is to prevent the filter bags from catching on fire. The spark arrestor was replaced with a functionally identical unit in August, 2017. During the AQD's inspection, on September 20, 2017, the newly installed spark arrestor was pointed out to the AQD staff.

2. PTI No. 15-01A, S.C. V.1: failure to conducted performance testing to demonstrate compliance with the 95% control efficiency of the lime injection system and baghouse for the removal of hydrogen chloride emissions.

FPI Response

FPI is not required to demonstrate compliance with the 95% control efficiency of the lime injection system and baghouse for the removal of hydrogen chloride emissions, because the generic air modeling, which was conducted by the AQD upon the issuance of PTI No. 15-01A revealed that "HCl, HF, and Cl impacts were below the applicable screening" levels. Please examine Page 4 of 5 of the attached AQD's EvalForm Memo Fields for 15-01A.

3. PTI No. 15-01A, S.C. IX.1; 40 CFR 63.1516(b): failure to submit semiannual compliance reports in 2014, 2015, 2016, and 2017.

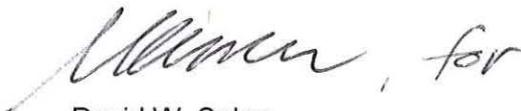
FPI Response

FPI recognizes the applicability of, will comply with, the provisions of 40 CFR 63.1516(b) as addressed in the Administrative Consent Order (ACO) currently under discussion with the EPA.

The proposed ACO with the EPA requires that the first semi-annual report required under 63.1516(b) would be first due post the Effective Date for the first six month period ending on either the December 31st of June 30th following the Effective Date. Although the ACO is not finalized, FPI anticipates that the first semi-annual report will be first due under the ACO for the six month period ending June 30, 2018.

FPI is confident to have fully addressed the MDEQ/AQD's allegations noted in its December 6, 2017 Violation Notice. Please do not hesitate to contact me or Mr. U. Sam Amer, amers@fritzinc.com or telephone no. 734-626-6673, for further concerns or any additional information.

Sincerely,

A handwritten signature in cursive script, appearing to read "D. Splan, for".

David W. Splan
734-362-3200

Cc: Mr. William Elson, FPI
Mr. U. Sam Amer, FPI
Mr. Jon Jarett, FPI
Mr. John Splan, FPI