M4547
MAWIS

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

M454730294

FACILITY: FRITZ PRODUCTS		**SRN / ID:** M4547
LOCATION: 255 MARION, RIVER ROUGE		**DISTRICT:** Detroit
CITY: RIVER ROUGE		**COUNTY:** WAYNE
CONTACT: Dave Splan , Vice President		**ACTIVITY DATE:** 06/11/2015
STAFF: Usama Amer	**COMPLIANCE STATUS:** Non Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Targeted Inspection of a Major Source Fritz has yet to demonstrate compliance with the d/f emission limit pursuant to the provisions of 40 CFR 63.1505(I)(3) as noted in the USEPA NOV/FOV of December 20, 2013.		
RESOLVED COMPLAINTS:		

On June 4 and June 11, 2015, I conducted a Scheduled Inspection at Fritz River Rouge Facility (Fritz), located at 255 Marion St., River Rouge, Wayne County. The purpose of the inspection was to determine the facility's current compliance status with the federal Clean Air Act of 1990, as amended; Part 55 of Michigan Public Act 451 of 1994, as amended; the administrative rules, and the conditions of AQD PTI's No. 15-01A, No. 90-11, and No. 39-10. The following Fritz staff represented Fritz during the inspection: Mr. David Splan, Mr. John Splan, Mr. Rick Mial, and Mr. Al Seguin

BACKGROUND & PROCESS DESCRIPTION

In his Inspection Report of January 6, 2010, AQD staff Bernie Sia, described Fritz as follows:

"The Fritz facility in River Rouge is a secondary aluminum production facility. The centerpiece of the production system is a single gas fired reverbatory furnace. Fritz's final product are 380 die cast alloy aluminum which has a 87% aluminum content and 383 or 384 alloy which has a 84% aluminum content. All of the scrap aluminum used at the plant originates from the Fritz's Huron Valley facility in Belleville, Michigan. This is a scrap processing facility which receives shredded non-ferrous metals as feedstock for aluminum recovery and cleaning. Recovered aluminum scrap is processed through a washer to remove any oil, dirt or other materials that may be adhering to the aluminum scrap. The washed aluminum scrap is then dried in a rotary dryer at 250° F – 300° F and is transported to the Fritz's River Rouge Plant for storage.

Prior to melting, the scrap is withdrawn from the storage area and processed through an eddy current separator, which further separates clean aluminum from contaminated aluminum materials (aluminum with steel bolts attached, coated copper wire, etc.). Only the "clean" scrap aluminum from the eddy current separator is charged to the furnace. Contaminated scrap aluminum is returned to the Huron Valley Facility for reprocessing.

Scrap aluminum is fed to the furnace via a belt conveyor, rotary drum pre-heater and vibratory conveyor. Within the reverberatory furnace, gaseous chlorine is injected into the bottom of the molten aluminum bath as flux. Solid sodium chloride and potassium chloride are spread over the top of the bath, also as fluxes. Impurities from the bath form a layer of slag/dross on the surface of the melt and are skimmed several times during a typical melting cycle. The molten aluminum product is poured into molds and then cooled. The aluminum products are in ingot or sow sizes and are sold to die casters for automotive parts.

Reverbatory Furnace (RF):

The furnace combustion stack is teed to allow all or part of the hot combustion emissions to be diverted by a blower and blast gates to the rotary drum when the drum is operating. The scrap aluminum is fed into the rotary drum via belt conveyor where it is heated with the hot combustion emissions prior to falling through a fully enclosed chute directly into the charging well of the furnace. When the rotary drum dryer is not in use the furnace emissions from the combustion is exhausted to the atmosphere."

The following is a list of permits associated with active processes:

PTI No.	Issuance Date	Process

39-10	5/19/10	Electric Induction Nickel Furnace
90-11	9/27/11	Rotary Copper Furnace
15-01A	10/17/12	Reverberatory Aluminum Furnace and Rotary Drum Preheater

The Electric Induction Nickel Furnace and the Rotary Copper Furnace were never operated for production by Fritz. They were dismantled and removed off site in May, 2012. Therefore, AQD PTI's No. 90-11, and No. 39-10 are obsolete and will be requested, by Fritz, to be voided.

Fritz is subject to the major source requirements of 40 CFR 63 Subpart RRR, Secondary Aluminum Production NESHAP. The reverberatory aluminum furnace is a Group 1 furnace and is currently the only affected source under the NESHAP. Therefore, on 6/23/14 Fritz submitted, to the AQD, a ROP application.

THE INSPECTION

Special Conditions (SC) of PTI No. 15-01A –

EUReverbFurnace1

DESCRIPTION: Reverberatory Furnace is used to melt aluminum

Flexible Group ID: FGAluminumMelt

Pollution Control Equipment: Cyclone and baghouse with lime injection

* SC #II.1 stipulates that Fritz shall not load more than 50 pounds of liquid chlorine (Cl) per 1 ton of aluminum (Al) processed to the EUReverbFurnace1.

- Cl is used to remove the magnesium (Mg) from the Al molten.

- The maximum usage rates of Cl per ton of Al charged were reported as follows:

· For 2014: 47.49 lb in 1/14 – Attachment A.1

· For 2015: 29.81 lb in 5/15 – Attachment A.2

- Al is processed at an average of 3.5 ton/hr.

- S. C. III.1 and III.2 - stipulate that the doors over charge bin and over fluxing well of EUReverbFurnace1 must be closed when active loading and fluxing are not taking place.

* I was assured by Fritz that the doors over charge bin and over fluxing well of EUReverbFurnace1 would be closed when active loading and fluxing operations are not taking place.

* SC #VI.1 stipulates that Fritz shall monitor and record the amount of Liquid Chlorine used per hour and per day on a daily basis.

- The maximum hourly and daily usage rates of Cl were as follows:

· 186.78 lb/hr and 4193.55 lb/day were reported for January, 2014

· 119.74 lb/hr and 2466.67 lb/day were reported for May, 2015

Attachment B

- The maximum daily usage rate of Cl per ton of Al charged was reported at 31.18 lb/ton Al for 5/11/15 Attachment B.1

*** SC #VI.2 stipulates that Fritz shall monitor and record the amount of Liquid Chlorine used on a pound per ton feed basis.**

- Attachments A.1, A.2 & B

* SC #VI.2 stipulates, in part, that SVReverbFurnace1shall be used when EUPreheat is not in operation. When emission units EUPreheat and EUReverbFurnace1 are both in operation the portion of EUReverbFurnace1 exhaust gases that are routed to the EUPreheat and all the exhaust gases from EUPreheat shall exit through the stack that serves FGAluminumMelt.

- Compliance of SVReverbFurnace1 with this condition was overlooked and not evaluated during the inspection.

EUCUPOLA

DESCRIPTION: 25 ton per hour capacity grey iron cupola.

Flexible Group ID: FGCUPOLA, FGFACILITY

Pollution Control Equipment: Afterburner for CO control, lime injection, and a pulse-jet baghouse followed by a stack.

EUCASTING

DESCRIPTION: Cupola pouring and casting operations (also known as "pouring/teeming"), including an electrically heated holding vessel and water-cooled continuous caster.

Flexible Group ID: FGCUPOLA, FGFACILITY

Pollution Control Equipment: NA

EULIMESILO

DESCRIPTION: Lime injection air pollution control equipment storage silo and lime handling.

Flexible Group ID: FGCUPOLA, FGFACILITY

Pollution Control Equipment: Bin Filter.

- EUCUPOLA, EUCASTING and EULIMESILO had commenced construction in 2009. However, the construction was interrupted since 2013. Fritz has never operated these 3 units for production. Therefore, no production or emission data were ever collected.

Fritz is in the process of evaluating the following 2 options regarding these 3 units:

1) Apply for a new PTI to cover the Iron Cupola and Casting equipment, as the current PTI No. 15-01A cannot be voided because it contains conditions associated with the active aluminum melting operation. In the meantime, the construction of the Iron Cupola and Casting equipment has been interrupted for more than 18 months, which results in voiding their PTI.

2) Physically remove the partially installed Iron Cupola and Casting equipment and request to modify PTI No. 15-01A to reflect the removal of the Iron Cupola and Casting equipment, as the AQD does not recognize the "mothballing" of process equipment.

- During the June 30, 2015, stack testing observation meeting, Fritz informed me that they have chosen option #1 above, and a formal letter addressing their choice would be submitted to the AQD shortly.

FGAluminumMelt

DESCRIPTION: The preheater and the aluminum reverberatory furnace

Emission Units: EUPreheat and EUReverbFurnace1

Pollution Control Equipment: Cyclone and baghouse with lime injection

*** SC #I.1 stipulates that the PM emission shall not exceed 0.0095 lb/1,000 lbs exhaust gas**

- The stack test of 9/14 indicated that the PM emission was 0.0015 lb/1,000 lbs exhaust gas. Attachment C

*** SC #I.2 & 3 stipulate that the Cl emissions shall not exceed 2.0 pph or 8.8 tpy, based on a12-month rolling time period as determined at the end of each calendar month**

- The stack test of 9/14 indicated that the HCl emission rate was 1.37 pph (Attachment C)

- Actual HCl emission calculations for calendar year 2014: 5.51 tpy

- Based on the monthly hours of productions, the HCl maximum monthly emission rates were calculated as follows:

- **For March, 2014: 997.36 lb**
- **For January 2015: 965.85 lb**

Attachment C.1

* SC #I.2 & 3 stipulate that the VE shall not exceed 5% for either of the FGAluminumMelt Baghouse Stack, or the FGAluminumMelt Fugitives

- Daily stack VE is conducted, reported and kept on file.

- VE of Fugitives has not been monitored. Fritz is to initiate a VE monitoring program on the fugitives immediately. A Violation Notice (VN) is not necessary at this time, because the condition above stipulates that the VE shall not exceed 5% for either of the Baghouse Stack, or the Fugitives.

*** SC #II.1 stipulates that Fritz shall not process more than 60,000 tpy of Al, based on a 12-month rolling time period as determined at the end of each calendar month.**

- The maximum usage rates of Al through puts were reported as follows:

  - For 2014: 32,771 tpy in 9/14 – Attachment D
  - For 2015: 31,745 tpy in 1/15 – Attachment D

* SC #II.2 stipulates that Fritz shall not use more than 96.36 MMSCF/yr of natural gas, based on a 12-month rolling time period as determined at the end of each calendar month.

- The maximum usage rates of natural gas were reported as follows:

  • For 2014: 68.4 MMSCF in 10/14 – Attachment E

  • For 2015: 68.7 MMSCF in 2/15 – Attachment E

* SC #II.3 stipulates that instantaneous Fluoride compound content of solid flux shall be no more than 5% by weight

- The MSDS, available in Fritz files, of the solid flux used shows the Fluoride compound content to be 1 – 5%.

* SC #III.1 stipulates that a program for continuous fugitive emissions control for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix A has been implemented and is being maintained.

- A continuous fugitive emissions control program is in place, although not in a written format, and being implemented as required. Records of continuous fugitive emissions control were reviewed during the inspection.

* SC #III.1 stipulates that a malfunction abatement plan (MAP) as described in Rule 911(2), for the lime injection system and baghouse, has been submitted within 60 days of permit issuance, and is implemented and maintained.

- The above MAP is in place and being implemented as required. An updated, as of January 10, 2014, copy of the MAP was provided during the inspection. It will be placed in Fritz file.

* SC #IV.1 stipulates that the baghouse associated with the flexible group is installed, operating, and maintained in accordance with manufacturers operation and maintenance manual and in accordance with the approved MAP. A pressure gauge must be installed which measures pressure drop across the baghouse and sounds an alarm when the pressure drop exceeds 6.0 inches W.G.

- The above baghouse is installed, operated, and maintained in accordance with manufacturers operation and maintenance manual and in accordance with the approved MAP. Fritz has installed 3 pressure gauges on each baghouse, reads and records the pressure drop across the each baghouse. The said pressure drop records were reviewed during the inspection. Attachment F shows the average pressure drops data for the 3 baghouses.

- Fritz believes thatthe baghouse performance is enhanced at a pressure drop greater than 6" W. G.,as recommended by the baghouse the manufacturer. Thereby, Fritz is in the process of requesting, from AQD, to increase recommended pressure drop to 8" W. G. This explains why Fritz did not take immediate actions in January and February, 2014, when the baghouses Module #2 & Module #1, respectively, showed higher pressure drops than 6" W. G. Ultimately, the bags in the mentioned modules were cleaned out.

* SC #IV.2 stipulates that an automatic lime injection system associated with the baghouse is installed, operating and maintained in accordance with manufacturer's instructions and in accordance with the approved MAP. Proper operation includes operation of the lime injection system such that the lime feed rate is greater than necessary to achieve 95% control of the hydrogen chloride emissions, as determined during stack testing.

- An automatic lime injection system associated with the baghouse is installed, operating and maintained in accordance with manufacturer's instructions and in accordance with the approved MAP. 95% control of the hydrogen chloride emissions is achieved by meeting the PTI limit of 2 lb/hr as specified in SC # I.2.

- The maximum lime feed rates were as follows: (Attachment G)

  8,532.6 lb for 2/14

  6,487.1 lb for 1/15

*** SC #IV.3 stipulates that Fritz shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the natural gas usage on a continuous basis.**

- Fritz has installed a device to monitor and record the natural gas usage on a continuous basis, and is calibrating, maintaining and operating it in a satisfactory manner. The natural gas monitor is read and recorded every Monday. Attachment E

* SC #IV.4 stipulates that Fritz shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the lime injection system feed rate on a continuous basis.

- Fritz has installed an electronic flow meter to monitor and record the lime injection system feed rate on a continuous basis, and is calibrating, maintaining and operating it in a satisfactory manner. The lime injection system feed rate is set at 10 lb/hr. During the HCl, PM & d/f emissions stack test of September, 2014, the lime flow rate averaged 2lb/hr.

* SC #IV.5 stipulates that Fritz shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the pressure drop across each baghouse on a continuous basis.

- Fritz has installed 3 Magnehelic pressure gages to monitor and record the pressure drop across each baghouse on a continuous basis, and is calibrating, maintaining and operating them in a satisfactory manner.

* SC #V.1 stipulates that Fritz shall verify PM and HCl emission rates and the control efficiency of the lime injection system and baghouse from FGAluminumMelt by testing at owner's expense, in accordance with AQD requirements.

- The latest stack test to verify PM and HCl emission rates and the control efficiency of the lime injection system and baghouses was conducted in September, 2014. Fritz did not pass the stipulated limit of d/f (Attachment C). Therefore, a retest to confirm compliance with the stipulated limit of d/f, after modifying and tweaking lime injection system and baghouses, is scheduled for June 30, 2015.

* SC #VI.1 stipulates that Fritz shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.

* SC #VI.2 stipulates that Fritz shall monitor and record, in a satisfactory manner, the aluminum throughput from FGAluminumMelt on a monthly and 12-month rolling time period basis.

– See note for SC #II.1. Attachment D

* SC #VI.3 stipulates that Fritz shall monitor and record, in a satisfactory manner, the natural gas usage rate from FGAluminumMelt on a monthly and 12-month rolling time period basis.

– See note for SC #II.2. Attachment E

* SC #VI.4 stipulates that Fritz shall keep, in a satisfactory manner, monthly and 12-month rolling time period HCl emission calculation records for FGAluminumMelt. Fritz shall use the control efficiency as determined per SC #V.1, or subsequent stack tests, for all HCl emission calculations used to determine compliance with SC #I.3.

- Fritz did not keep HCl emission calculation records prior to September, 2014. However, the HCl emission rates calculations was back calculated after the stack test was conducted in September, 2014. Attachment C.1

* SC #VI.5 stipulates that Fritz shall maintain a current listing from the manufacturer of the chemical composition of each flux material used, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD.

- MSDS sheets are available in Fritz files, and were reviewed during the inspection.

* SC #VI.6 stipulates that Fritz shall monitor and record the lime slurry feed rate of the lime injection system on a continuous basis in a manner and with instrumentation acceptable to AQD. The monitors and associated monitoring data shall be used for compliance demonstration purposes for the control efficiency of the lime injection system.

- See note for SC #IV.2. Attachment G

* SC #VI.7 stipulates that Fritz shall monitor and record the pressure drop across the baghouse on acontinuous basis in a manner and with instrumentation acceptable to the AQD.

- The maximum pressure drop across the baghouse rates were as follows: (Attachment F)

  • 6.49" water for Module 2 in 1/14

  • 5.63" water for Module 1 in 4/15

* SC #VI.8 stipulates that Fritz shall keep records of the maintenance of the lime injection system and the baghouse and shall keep calibration records for all monitors associated with the lime injection system and baghouse in a manner acceptable to the AQD.

- Maintenance and calibration records of the lime injection system and the baghouse are available in Fritz files, and were reviewed during the inspection.

* SC #IX.1 stipulates that Fritz shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63 Subparts A and RRR, as they apply to FGAluminumMelt.

- The highest monthly emission rates of HCl were 997.36 lb/mo for March, 2014 and 965.85 lb/mo for January, 2015. The annual emission rate of HCl was 11040.83 lb (5.52 tpy) for the year 2014, and 4429.21 lb (2.21 tpy) as of May, 2015. Attachment C.1

- The average monthly emission rate of d/f was 0.5 tpy for the year 2014. Attachment I.1

- Fritz is not in compliance with the provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63.1505(I)(3), as stipulated in the USEPA NOV/FOV of December 20, 2013. Fritz is not in compliance until future test results demonstrate the emission limit of 15 TEQ ug/Mg of raw material is met. Fritz test results of September, 2014 showed the d/f emission rate was 23.6 TEQ ug/Mg charged. Attachment C

FGCUPOLA

Description: Iron cupola processing and associated operations.

Emission Units: EUCUPOLA, EUCASTING, EULIMESILO, EUCUPOLAFUGS

- Construction of FGCUPOLA had commenced in 2009. However, the construction was interrupted since 2013. Fritz has never operated this FG for production. Therefore, no production or emission data were ever collected.

FGFACILITY

***SC #I. EMISSION LIMITS:**

Pollutant	Limit	Time Period/Operating Scenario
1. CO	342 tpy	12-month rolling time period as determined at the end of each calendar month
2. NOx	69 tpy	12-month rolling time period as determined at the end of each calendar month
3. SO_2	97 tpy	12-month rolling time period as determined at the end of each calendar

		month
4. VOC	41 tpy	12-month rolling time period as determined at the end of each calendar month
5. PM	35 tpy	12-month rolling time period as determined at the end of each calendar month
6. PM10	22 tpy	12-month rolling time period as determined at the end of each calendar month
7. Individual HAP	Less than 10.0 tpy	12-month rolling time period as determined at the end of each calendar month
8. Aggregate HAP	Less than 24.0 tpy	12-month rolling time period as determined at the end of each calendar month

- The following data reflect the maximum emissions rates and are included in Attachments H.1- H.7:

Pollutant	Emission Rate	Time Period/Operating Scenario
1. CO	2.87 tpy for 10/14 Attachment H.1 2.885 tpy for 2/15 Attachment H.2	12-month rolling time period as determined at the end of each calendar month
2. NOx	3.42 tpy for 9/14 Attachment H.1 3.45 tpy for 2/15 Attachment H.2	12-month rolling time period as determined at the end of each calendar month
3. SO_2	0.33 tpy for 10/14 **0.33 tpy for 1/15** **Attachment H.3**	12-month rolling time period as determined at the end of each calendar month
4. VOC	2.43 tpy for 11/14 2.41 tpy for 2/15 **Attachment H.4**	12-month rolling time period as determined at the end of each calendar month
5. PM	0.65 tpy for 10/14 Attachment H.5	12-month rolling time period as determined at the end of each

	0.463 tpy for 1/15 **Attachment H.6** **Attachment H.7**	calendar month
6. PM10	0.65 tpy for 10/14 Attachment H.5 0.463 tpy for 1/15 Attachment H.6 **Attachment H.7**	12-month rolling time period as determined at the end of each calendar month
7. Individual HAP	HCl = 5.7 tpy for 9 & 10/14 5.6 tpy for 1/15 d/f = 0.000983 lb for 9/14 0.000952 lb for 1/15 Attachments H. 1 & H.2	12-month rolling time period as determined at the end of each calendar month
8. Aggregate HAP	5.7 tpy for 2014 5.6 tpy for 2015 Attachments H. 1 & H.2	12-month rolling time period as determined at the end of each calendar month

NOTE: Since PM10 is a subset of PM, so by definition, PM10 cannot be any more than total PM. By reporting PM and assuming that the PM10 emissions are the same, Fritz is being very conservative in reporting the PM10 monthly emissions equaling the same value as PM. See Attachment H.7.

*** SC #III.1 stipulates that Fritz shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63 Subparts A and ZZZZZ, as they apply to FGFACILITY.**

- This condition was instituted in the PTI to cover FGCUPOLA. However, construction of FGCUPOLA had commenced in 2009, but was interrupted since 2013. Fritz has never operatedthis FG for production. Therefore, this condition is obsolete.

* SC #III.2 stipulates that no later than 60 days after issuance of this permit, the Fritz shall submit to the AQD District Supervisor, for review and approval, a revision of the existing site fugitive dust plan to include activities related to the operation of FGFACILITY. This plan shall
include fugitive dust control for coke piles and scrap piles in addition to control for roadways.

- The fugitive dust plan, pursuant to Appendix A of PTI No. 15-01A, is in place and being implemented as required.

* SC #VI.1 stipulates that within 90 days after the issuance date of this permit, Fritz shall develop a spreadsheet for approval by the AQD to calculate all emissions for FG FACILITY as specified in SC I.1 through I.8, based on material usage rates, test results and/or emission
factors.

- Attachments I.1, I.2 & I.3 were provided during the inspection.

* SC #VI.2 stipulates that Fritz shall keep, in a satisfactory manner, monthly and 12-month rolling time period CO, NOx, SO2, VOC, PM, PM10, individual and aggregate HAP emission calculation records for FGFACILITY, as required by SC I.1 through I.8.

- Attachments I.1, I.2 & I.3 were provided during the inspection.

* SC #VI.3, SC #VI.4 & SC #VI.6 stipulate that Fritz shall keep records pursuant to applicable federal requirements for recordkeeping and reporting as listed in Appendix E and Table 3 in Appendix C, which pertain to 40 CFR Part 63, Subparts A & ZZZZZ.

- These 3 conditions areobsolete, as the FGCUPOLA was never completed construction or operated for production.

*SC #VII.1 - SC #VII.3 stipulate reporting requirements pursuant to 40 CFR Part 63, Subparts A & ZZZZZ

- These 3 conditions are obsolete, as the FGCUPOLA was never completed construction or operated for production.

APPENDIX A - FUGITIVE DUST CONTROL PROGRAM

- The fugitive dust plan, pursuant to Appendix A of PTI No. 15-01A, is in place and being implemented as required.

APPENDIX B - Performance Test Requirements (§ 63.10898 of 40 CFR Part 63 Subpart ZZZZZ)

APPENDIX C - Monitoring Requirements (§ 63.10897 of 40 CFR Part 63 Subpart ZZZZZ)

APPENDIX D - Table 3 to Subpart ZZZZZ of Part 63.—Applicability of General Provisions to New and Existing Affected Sources Classified as Large Foundries

APPENDIX E – Table 4 to Subpart ZZZZZ of Part 63.—Compliance Certifications for New and Existing Affected Sources Classified as Large Iron and Steel Foundries

APPENDIX F – Recordkeeping and Reporting Requirements (§ 63.10899 of 40 CFR Part 63 Subpart ZZZZZ)

- These 5 appendices are obsolete, as the FGCUPOLA was never completed construction or operated for production.

CONCLUSION

Fritz appeared to operate in compliance with the federal Clean Air Act of 1990, as amended; Part 55 of Michigan Public Act 451 of 1994, as amended; the administrative rules, and the conditions of AQD PTI's No. 15-01A, with one exception. Fritz has yet to demonstrate compliance with the d/f emission limit pursuant to the provisions of 40 CFR 63.1505(l)(3) as noted in the USEPA NOV/FOV of December 20, 2013.

NAME Sam Amer DATE 8/24/15 SUPERVISOR JK