



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREYER  
DIRECTOR

December 6, 2017

Mr. David W. Splan, Vice President  
Fritz Enterprises, Inc.  
1650 West Jefferson Ave.  
Trenton, MI 48183

SRN: M4547, Wayne County

Dear Mr. Splan:

**VIOLATION NOTICE**

On July 20 and September 20, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted inspections of Fritz Enterprises, Inc., located at 255 Marion, River Rouge, Michigan. The purpose of these inspection was to determine Fritz Enterprises' compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 15-01A.

During these inspections, staff observed the following violations:

Process Description	Rule/Permit Condition Violated	Comments
EUReverbFurnace1	PTI No. 15-01A, S.C. III.3; R336.1910	Cyclone of the baghouse system was not properly installed and operated at the time of the inspections.
EUReverbFurnace1	PTI No. 15-01A, S.C. VI.2	Facility failed to monitor and record the amount of liquid chlorine used on a pound per ton feed basis.
FGAluminumMelt	PTI No. 15-01A, S.C. IV.1; R336.1910	Facility failed 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.

FGAluminumMelt	PTI No. 15-01A, S.C. V.1	Facility has not 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.
FGAluminumMelt	PTI No. 15-01A, S.C. IX.1; 40 CFR 63.1516(b)	Facility failed to submit semiannual compliance reports in 2014, 2015, 2016, and 2017.

PTI No. 15-01A, EURverbFurnace1, Special Condition III.3 states, "Applicant shall not operate the melting furnace unless the baghouse and cyclone are installed and operating properly." At the time of inspection, the cyclone had been removed and was no longer part of the air pollution control system. The melting furnace was in operation on the dates the inspections were performed. This also represents a violation of R336.1910, which requires that, "an air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law."

PTI No. 15-01A, EURverbFurnace1, Special Condition VI.2 states, "The permittee shall monitor and record the amount of Liquid Chlorine used on a pound per ton feed basis. The permittee shall keep the records on file at the facility and make them available to the Department upon request." During the inspection, the facility was unable to provide records of chlorine usage rate on a pound per ton feed basis, as required. Facility stated that chlorine usage rate is calculated based on an hourly average based on monthly aluminum throughput, which is not in accordance with the permit.

PTI No. 15-01A, FGAluminumMelt, Special Condition IV.1 states, in part, "Applicant shall not operate the FGAluminumMelt unless 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 (Malfunction Abatement Plan)." The MAP, as submitted by the facility and approved by AQD, describes the air pollution control system as such: "...the exhaust streams are combined and directed through a cyclone mechanical separator to a negative pressure fabric filter baghouse system, comprised of 3 baghouse units." At the time of inspection, the cyclone mechanical separator had been removed and was no longer part of the air pollution control system, as described in the approved MAP. FGAluminumMelt was in operation on the dates the inspections were performed. This also represents a violation of R336.1910, which requires that, "an air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law."

PTI No. 15-01A, FGAluminumMelt, Special Condition V.1 states, in part, "Within 180 days after commencement of trial operation of the lime injection system, the permittee 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 Department requirements." Per notification from the facility, the continuous lime injection system commenced operation in November 2012. At the time of inspection, the facility had yet to perform testing of the lime injection system and baghouse within 180 days of commencement of operations to verify the lime feed injection rate necessary to demonstrate compliance with the limit of 95% control of the hydrogen chloride emissions set in FGAluminumMelt, Special Condition IV.2.

PTI No. 15-01A, FGAluminumMelt, Special Condition IX.1 states, "The permittee 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." 40 CFR 63.1516(b) states, in part, "The owner or operator of a major or area source must submit semiannual reports according to the requirements in § 63.10(e)(3). Except, the owner or operator must submit the semiannual reports within 60 days after the end of each 6-month period instead of within 30 days after the calendar half as specified in § 63.10(e)(3)(v). When no deviations of parameters have occurred, the owner or operator must submit a report stating that no excess emissions occurred during the reporting period." A review of records showed that the facility failed to submit the second semiannual report for 2014, the first and second semiannual reports for 2015 and 2016, and the first semiannual report for 2017.

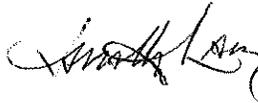
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 3, 2018 (which coincides with 28 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Fritz Enterprises, Inc. believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Fritz Enterprises, Inc. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Jonathan Lamb  
Senior Environmental Quality Analyst  
Air Quality Division  
313-456-4683

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ