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Subject: EGLE's Violation Notice (VN) of August 29, 2022
N6823, Genesee County

The followings and attachments are in response to the above subject VN. Fritz Enterprises, Inc.'s (FEI) – Flint responses are presented, underneath EGLE's allegations, in bold and italic fonts

- 1) On April 12, 2022, EGLE MMD staff were conducting an inspection of Fritz Enterprises. During their inspection, they observed numerous pieces of paper emitted by the wet Scrubber, which, along with a cyclone, is the air pollution control device for EU-ZBOX. MMD's Evin Maguire noted that some of the papers left the site. In the professional judgement of AQD staff, the waste papers landing offsite were sufficient to constitute a violation of Rule 901(b) of the administrative rules promulgated under Act 451, which prohibits unreasonable interference with the comfortable enjoyment of life and property.

Three (3) obstructions were in the duct system connecting the Z-Box, the Cyclone & the Wet Scrubber as follows (See Att. 1):

- a. The bottom of the Z-Box;***
- b. Intake duct from the Z-Box to the cyclone; and***
- c. The damper between the cyclone & the Wet Scrubber***

Clearing the above 3 obstructions started during the first week of May, 2022. All of the said obstructions were cleared by the week of August 22, 2022. Two (2) access openings/panels have been installed for observation and cleaning purposes on the cyclone (See Att 6). Moreover, a preventative maintenance program mandating cleaning out & clearing duct system every other day, was established and implemented.

- 2) The large number of papers passing through the scrubber uncontrolled also indicate a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning

device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

The Wet Scrubber clean-up was completed by the week of August 22, 2022. Moreover, FEI installed new flashings in areas of inlet & outlet to/from the air circulation system, and implemented a preventative maintenance program mandating cleaning out & clearing duct system every other day.

- 3) The April 12, 2022, observation of waste papers leaving the wet scrubber also demonstrates that waste materials were not being stored in an acceptable manner. This is a violation of PTI No. 92-00B, FG-SHREDDEROP, SC III.7, which requires in part that all waste materials generated by FG-SHREDDEROP shall be contained and disposed of or recycled in an acceptable manner in compliance with all applicable state and federal rules and regulations.

Normally, papers and dirt are mixed with scrap metals received. Waste materials are not stored on premises. All generated waste materials are deposited in dumpsters shipped to the landfill soon after generation.

- 4) During the April 20, 2022, joint inspection by EPA and AQD, it was observed that the pressure drop gauge and liquid flow indicator for the wet scrubber which controls EU-ZBOX were inoperable. This is a violation of PTI No. 92-00B, EU-ZBOX SC IV.1, which requires that the wet scrubber be installed, maintained, and operated in a satisfactory manner, as well as a violation of EU-ZBOX SC VI.1, which requires the permittee to install, maintain and operate a pressure drop gauge and a liquid flow indicator on the wet scrubber portion of EU-ZBOX. It is also a violation of Rule 910, which, as previously noted, requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

a. A new ΔP gage was installed on June 3, 2022. See Att. 2.

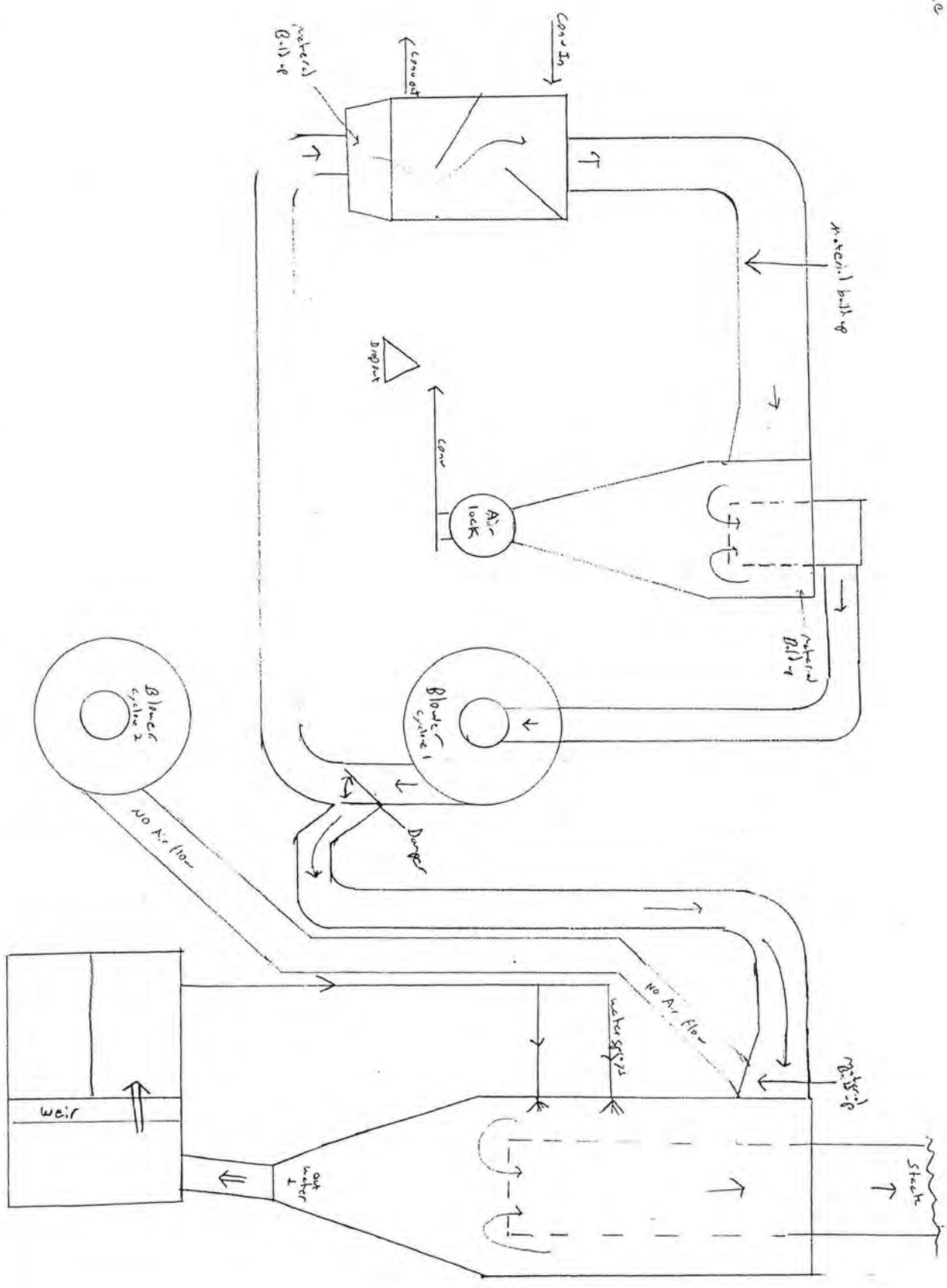
b. A new water flow meter was installed on May 26, 2022. See Att. 3.

c. ΔP & water flow data are being recorded & logged daily. See Att. 4 & Att. 5.

- 5) Lastly, on April 20, 2022, it was noted that some fluff materials were not stored in 3-sided bunkers. This is a violation of PTI No. 92-00B, FG-SHREDDEROP SC III.6, which requires that the permittee shall store all non-ferrous, non-metal, and waste materials (i.e., fluff) generated by FG-SHREDDEROP in 3-sided bunkers.

Quotes for installing a storage bunker (50' X 50') to collect fluff materials are being solicited. In the meantime, all generated fluff materials are being shipped to the landfill on a daily basis; therefore, accumulation of the fluff materials is kept at a minimum.

NOT SCALE TO SCALE





New Magnehelic
installed on
Cyclone 6/3/22



Water Flow Meter
installed 5/26/22

26" x 26" Access
Panels installed on
Cyclone 6/10/22

