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December 12, 2014



Mr. Jorge Acevedo
Senior Environmental Engineer
MDEQ – AQD – Detroit Office
Cadillac Place
3058 West Grand Blvd., Ste. 2-300
Detroit, MI 48202-6058

Subject: Response to Violation Notice - dated December 3, 2014
Fitzgerald Finishing, L.L.C., SRN: B3037

Dear Mr. Acevedo:

Fitzgerald Finishing, L.L.C. (Fitzgerald) has prepared this document to respond to the Violation Notice issued its metal parts coating facility by the Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) on December 3, 2014. The MDEQ-AQD Violation Notice specifies that the following violations occurred:

- a) Heavy aromatic naphtha emission exceeded daily limit of 157.6 lb/day.
- b) Some containers containing waste materials were observed open.

These MDEQ-AQD findings are based on the results of an inspection performed on October 3, 2014 and a review of requested records performed on November 25, 2014.

PTI NO. 403-99C REQUIREMENTS

Special Condition No. I.2. for FG-DIPSPINS of Permit to Install No. 403-99C specifies a daily heavy aromatic solvent naphtha (CAS No. 64742-94-5) emission limit of 157.6 lb/day. The emission limit was established by an air quality impact demonstration (air pollutant dispersion modeling analysis).

Special Condition No. III.1. for FG-DIPSPINS of Permit to Install No. 403-99C specifies that: *The permittee shall capture all waste materials and shall store them in closed containers.*

CAUSES AND DURATIONS OF VIOLATIONS

Based on material use records and emission rate calculations performed by Fitzgerald, the heavy aromatic solvent naphtha emission limit was exceeded on the following seven (7) days:

- 1. August 7, 2014 – 167.8 lb/day;

2. August 11, 2014 – 165.2 lb/day;
3. September 3, 2014 – 167.3 lb/day;
4. September 10, 2014 – 182.3 lb/day;
5. September 15, 2014 – 161.9 lb/day;
6. October 22, 2014 – 225.6 lb/day; and
7. October 31, 2014 – 170.2 lb/day.

When averaged over all work days for the entire month, the calculated daily emission rate is much less than 157.6 lb/day. The maximum daily emission rate, averaged over the entire month, occurred in October 2014 (80.7 lb/day). The monthly average emissions for August and September 2014 were 78.2 and 79.3 lb/day, respectively.

Fitzgerald operates its coating operations based upon customer orders, which in many cases arrive the same day that the parts are coated. Throughout the course of a day and as additional orders are received Fitzgerald updates its production schedule to meet the customer's needs. Coating and solvent use data is recorded for each of the eight (8) lines throughout the day. A calculated daily emission violation is typically discovered several days after it occurs, once all production and material use data is collected and entered into the calculation spreadsheet. Due to the highly flexible production schedule, which is a requirement of the automobile industry just-in-time material management program, Fitzgerald is unable anticipate its production schedule and make necessary adjustments to material use rates throughout the day.

In 2013 production at Fitzgerald began to increase and the company requested (and received) a modified air permit to account for the increase in production. Production has continued to increase throughout 2014 and recently one major customer has transitioned to more solvent based coatings, as opposed to using water based coatings. The combination of these factors is the cause of the daily emission rate violation.

ACTIONS TAKEN AND PROPOSED TO CORRECT VIOLATIONS

PTI No. 403-99C has provisions for the installation of a new thermal oxidizer, RTO-2. Fitzgerald is nearing completion of the installation of RTO-2. The new oxidizer has a greater airflow and solvent loading capacity and is expected to have a greater destruction efficiency as compared to the existing thermal oxidizer, which was tested at 95% destruction efficiency. Fitzgerald is also making modifications to the facility such that the building can be considered a building enclosure, which will improve the capture efficiency. These modifications are expected to increase the overall control efficiency of the facility (current control efficiency is 76%) and reduce air pollutant emission rates.

The RTO-2 installation is expected to be completed in early January 2015. Fitzgerald is currently preparing a test protocol for the determination of the overall control efficiency (capture and destruction efficiency) of the modified and improved air collection and control system. The testing is expected to occur in January or February 2015. A modest increase of control efficiency will greatly reduce the daily heavy aromatic solvent naphtha emissions and overall

VOC emissions (an anticipated increase of control efficiency to 88% will reduce daily emissions by 50%).

Fitzgerald will provide the MDEQ-AQD with information on the status of the implemented corrective actions as they progress (i.e., completion of construction, emissions testing and test results).

To address Special Condition No. III.1., Fitzgerald will reemphasize to all employees the requirement to remove waste materials in a timely manner and that all waste containers must remain in the closed position when they are not in use.

Fitzgerald appreciates the consideration by the MDEQ-AQD of the information presented in this document.

Please contact us if you have questions or require addition information.

Sincerely,

FITZGERALD FINISHING, L.L.C.

A handwritten signature in black ink, appearing to read "Thomas S. Melita", is written over the printed name and title.

Thomas S. Melita
President