



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

November 7, 2018

Mr. Thomas S. Melita, General Manager
Fitzgerald Finishing Company
17450 Filer Avenue
Detroit, Michigan 48212

SRN: B3037, Wayne County

Dear Mr. Melita:

VIOLATION NOTICE

On June 12, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Fitzgerald Finishing located at 17450 Filer Avenue, Detroit, Michigan. The purpose of this inspection was to determine Fitzgerald Finishing 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 403-99D.

During the inspection and review of the records, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-DIPSPINS	PTI 403-99D, FG-DIPSPINS, Special Condition I.1, R 336.1205, and R 336.1702(a)	VOC emissions exceeded the limit of 54.0 Tons Per Year (TPY) on a 12-month rolling time period for the following months: June 2017 (58.1 TPY), July 2017 (58.2 TPY), August 2017 (57.5 TPY), September 2017 (57.7 TPY), October 2017 (57.2 TPY), November 2017 (57.2 TPY), December 2017 (56.2TPY), January 2018 (56.3 TPY), February 2018 (58.1 TPY), and March 2018 (57.9 TPY).
FG-DIPSPINS	PTI 403-99D, FG-DIPSPINS, Special Condition IV.1, R 336.1205, R 336.1702(a), and R 336.1910	Dip Spin lines continued to operate after malfunction to RTO and while RTO was out of operation on the following days: April 24, 2017, April 25, 2017, April 26, 2017, April 27, 2017, April 28, 2017, and April 29, 2017.

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FG-DIPSPINS	PTI 403-D, FG-DIPSPINS, Special Condition I.2, and R 336.1225(1)	Heavy Aromatic Solvent Naptha emissions exceeded the limit of 157.6 lbs/day for the following days: April 24, 2017 (205.9 lbs/day), April 25, 2017 (310.0 lbs/day), April 26, 2017 (395.4 lbs/day), April 27, 2017 (422.7 lbs/day), and April 28, 2017 (277.8 lbs/day).
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AQD acknowledges the letter submitted by Fitzgerald Finishing, dated July 27, 2018, explaining the cause of the RTO malfunction. The operation of the Dip Spin lines without the operation of the RTO is a violation of the Permit to Install, specifically Special Condition IV.1 of PTI No. 403-99D.

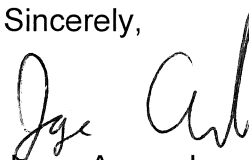
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 28, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of 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.

Please submit the written response to the DEQ, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Fitzgerald Finishing 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.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Fitzgerald Finishing. 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,



Jorge Acevedo
Environmental Engineer Specialist
Air Quality Division
313-456-4600

Mr. Thomas S. Melita

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cc: Ms. Amanda Davison, Fitzgerald Finishing
Mr. Paul Max, City of Detroit BSEED
Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ