

M4547  
MANILA

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

M454744960

FACILITY: FRITZ PRODUCTS		SRN / ID: M4547
LOCATION: 255 MARION, RIVER ROUGE		DISTRICT: Detroit
CITY: RIVER ROUGE		COUNTY: WAYNE
CONTACT: U. Sam Amer , Environmental Manager		ACTIVITY DATE: 06/22/2018
STAFF: Jonathan Lamb	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled inspection, FY 2018		
RESOLVED COMPLAINTS:		

INSPECTED BY: Jonathan Lamb, MDEQ-AQD

DATE OF INSPECTION: June 22, 2018

PERSONNEL PRESENT: Sam Amer, Environmental Manager; Dave Splan, Vice President; John Splan, Plant Superintendent; Jon Jarrett, Plant Manager

FACILITY CONTACT: Sam Amer (734-626-6673, mobile phone)

FACILITY PHONE NUMBER: (313) 843-8000

FACILITY FAX NUMBER: (313) 842-7860

**FACILITY BACKGROUND:**

Fritz Enterprises, Inc. performs secondary aluminum smelting to make aluminum ingots and sows used in aluminum die casting. The facility receives shredded scrap aluminum from its sister facility, Huron Valley Steel in Belleville. The scrap aluminum is processed through a gas-fired reverberatory furnace with a holding capacity of 130,000 pounds to produce aluminum alloy molds.

Fritz is a Title V-subject source based on allowable limits of CO permitted above major source thresholds. AQD and the U.S EPA had also determined Fritz to be a major source of HAPs and subject to 40 CFR Part 63, Subpart RRR – National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production (Secondary Aluminum MACT), though Fritz has disputed this designation as being a major source of HAPs. With the recent change in U.S. EPA's "once in, always in" policy, Fritz' designation as a major source of HAPs is currently being reevaluated.

Production at the facility operates 24 hours per day, 7 days per week and there are about 30 employees on site.

**COMPLAINT/COMPLIANCE HISTORY:**

Over the past ten years, Fritz Enterprises has been cited for numerous violations by both MDEQ-AQD and U.S. EPA. These violations are documented in the facility file. The most recent compliance issues are discussed below:

Fritz is currently involved in an ongoing enforcement action with U.S. EPA which was initiated in 2010. The U.S. EPA issued a Finding of Violation to Fritz on September 27, 2010, for noncompliance of provisions of Subpart RRR, including failure to demonstrate compliance with the emission limit for dioxin/furans (D/F) set in the Secondary Aluminum MACT. U.S. EPA and MDEQ-AQD had determined that the facility is a major source of HAPs and subject to the Title V permitting requirements and the Secondary Aluminum MACT and have cited the facility for failure to obtain a Renewable Operating Permit. The facility submitted an application for a Renewable Operating Permit in June 2014, but the application was determined to be incomplete since it did not include conditions required to demonstrate compliance with the Secondary Aluminum MACT.

On January 25, 2018, U.S. EPA issued a memorandum rescinding the agency's "one in, always in" policy for major sources of HAPs. Based on this change in policy, Fritz has notified U.S. EPA and MDEQ that it believes the facility is now an area source subject to Subpart RRR and is no longer a major source of HAPs subject to the Title V permitting requirements; U.S. EPA and MDEQ is currently reviewing this determination. Fritz intends on submitting an application for a new Permit to Install, which would include opt-out limits for HAPs and removal of equipment which was permitted but never installed. At the time of this writing, Fritz and U.S. EPA remain in enforcement negotiations and the violations cited by U.S. EPA remain unresolved.

Fritz was issued a Violation Notice on December 6, 2017, for multiple violations observed during inspections performed on July 20 and September 20, 2017. These violations included the following:

- Operating the aluminum melting furnace without the control equipment (cyclone) properly installed and operated and not operating the baghouse system in accordance with the OM&M Plan;
- Failure to monitor and record the amount of liquid chlorine used on a pound per feed basis;
- Failure to conduct performance testing to demonstrate compliance with the 95% destruction efficiency requirement of the control system;
- Failure to submit semiannual and annual compliance reports in 2014, 2015, 2016, and 2017.

On January 8, 2018, Fritz submitted a response to the Violation Notice, disputing the violations cited in the December 6, 2018 notice. At the time of inspection, these violations remain unresolved; further discussion of these violations can be found in the compliance evaluation section of this report.

Fritz was issued a Violation Notice on October 11, 2016, for exceeding the opacity limit of 5% over a 6-minute average and for not controlling emissions from the furnace operations, based on Method 9 visible emission observations performed on September 18, 2016. The emissions were caused by a failure in the ductwork along the roof between the furnace and the baghouse. To resolve the issue, the facility repaired the ductwork and revised its malfunction abatement plan to increase the frequency of inspections of the ductwork. No visible emissions have been observed from the ductwork during my visits to the facility since the corrective actions were taken, so this violation is resolved.

### **PROCESS DESCRIPTION AND INSPECTION NARRATIVE:**

Fritz receives shredded scrap aluminum from Huron Valley Steel, which has been washed, dried, and run through a magnetic separator at Huron Valley Steel prior to delivery to Fritz. After delivery, the scrap is placed into an indoor storage area. To begin processing, the scrap is loaded into a feed hopper with a front-end loader and passes through an eddy current separator to remove any non-metals from the scrap. The scrap then goes up an incline conveyor to an overhead conveyor, which sends the scrap to the rotary drum preheater (EUPreheat). The preheater is heated by exhaust gases from the furnace; no additional fuel is used. Once the scrap is preheated, it is charged into the reverberatory furnace (EURverbFurnace1) where the aluminum is melted to create an "aluminum bath". The charging of aluminum into the furnace is basically a continuous process, with scrap being added to the furnace until the bath reaches a certain level in the furnace. As scrap is added to the furnace, the melted aluminum is mixed with a "well walker" while gaseous chlorine is injected continuously in the bottom of the aluminum bath. Silica and copper may also be added to the aluminum bath, depending on customer specifications for the alloy. As defined

in Subpart RRR, the furnace is designated as a sidewall group 1 furnace/secondary aluminum production unit (SAPU) with add-on control equipment using lime-injected fabric filter. [Note: Fritz has claimed the aluminum scrap used in the furnace to be “clean charge”; however, in its Finding of Violation, dated September 27, 2010, U.S. EPA noted that the scrap does not meet the definition of “clean charge” per Subpart RRR].

The chlorine is used as a flux to remove magnesium from the aluminum scrap. Liquid chlorine is vaporized into a gas and injected into the pump well of the furnace, where it is mixed with the molten aluminum in the bottom of the furnace. The liquid chlorine injection rate changes throughout processing based on the varying magnesium content of the scrap added to the furnace; samples of the aluminum bath are taken about once an hour to determine the magnesium content and adjust the injection rate accordingly. The chlorine injection rate is electronically monitored and recorded on a continuous basis. A solid cover flux of sodium chloride and potassium chloride is also added to the top of the bath to remove impurities from the aluminum bath. Solid flux is added manually about once an hour and the amounts added are handwritten in a log sheet. Impurities from the scrap adhere to the flux and form a layer on top of the molten metal bath known as dross. The furnace is periodically “dedrossed” during processing by using a “well walker” to skim the dross off the surface of the bath a container. Dedrossing occurs just prior to pouring. The dross is sent to Real Alloys in Wabash, Indiana, where it is further processed to reclaim any aluminum lost in the dedrossing.

The furnace is poured down a launder (trough) into molds on the ingot line conveyor or into molds on the sow wheel, depending on customer specifications. The ingots and sows are then cooled and stacked onto pallets for delivery to customers. Most of the aluminum is “380 alloy” used for die casting in automotive and other industries.

The aluminum processing is performed on a batch basis. One batch takes around three to three and half hours and produces about 43,500 pounds of aluminum molds per batch. The time between batches can range from 45 minutes to two hours.

Emissions from the furnace and preheater are ducted to a negative pressure baghouse system comprised of a spark arrestor and three baghouses, and the whole system exhausts to a single stack. The three baghouses are run in parallel; the facility usually runs two baghouses at a time with the third baghouse on standby. Flow rate through the two active baghouses is usually in the range of 28,000-30,000 scfm., though the facility still maintains a minimal flow (approximately 400-500 scfm) through the standby baghouse to remove moisture from the baghouse to prevent caking of material on the bags. Baghouse combinations are alternated as needed based on pressure drop and cleaning cycles. Baghouses are taken off line via a manual process of opening and closing of dampers. Magnehelic gauges are installed on each baghouse to monitor pressure drop. Each baghouse has approximately 416 bags, and bags are replaced on an annual basis; the bags were most recently replaced August/September 2017.

Hydrated lime is used to control hydrogen chloride (HCl) emissions from the furnace; HCl is produced during the reaction of the magnesium with the chlorine. 50-pound bags of hydrated lime are manually added to a lime hopper and the lime is added into the ductwork upstream of the baghouse via a screw auger. A Powdered Activated Carbon (PAC) system was installed in November 2015 to control dioxin/furan (D/F) emissions below the limits set in Subpart RRR. Similar to the lime injection system, PAC is dumped from bags into a hopper which meters the PAC into the exhaust gas stream. The weight of lime and carbon in the hoppers is monitored by a scale; an alarm is activated if the level of lime or carbon in the hopper gets too low. The

minimum injection rate of both the lime and PAC are determined based on the parameters used during most recent compliant stack test. The most recent compliant stack test was performed on September 20, 2017, and established the minimum set points of 22.7 lb/hr for hydrated lime and 2.69 lb/hr for PAC; at the time of inspection, the facility was using automated set points of 24.0 lb/hr for hydrated lime and 3.2 lb/hr for PAC.

Various operating parameters, including baghouse pressure drop, chlorine injection rate, lime and carbon injection rates, and baghouse inlet temperatures, are monitored on a display screen near the furnace and are also monitored and recorded on a computer in the office.

The facility had sent a letter to AQD, dated November 8, 2017, stating its intention to remove the scrap preheater from the process, but informed AQD staff during the inspection that the company had changed its mind and left the scrap preheater in the process. An email rescinding the November 8, 2017, request was sent to AQD via email on June 22, 2018. During the inspection, facility personnel also discussed the possible installation of a "pigging" operation, which it has determined would require a Permit to Install.

### **APPLICABLE RULES/ PERMIT CONDITIONS:**

Fritz operates under Permit to Install (PTI) No. 15-01A, issued on October 12, 2012, which contains a facility-wide CO limit of 342 tons per year, making the facility a major source for CO and thus subject to Title V permitting requirements. This permit also set facility-wide limits on hazardous air pollutants (HAPs) and sulfur dioxide (SO<sub>2</sub>) below major source thresholds; however, MDEQ and U.S. EPA considered this facility to be a major source of HAPs under the U.S. EPA's "once in, always in" policy since emissions testing performed on August 28, 2013, showed an HCl emission rate of 4.2 lb/hr., which demonstrated the facility had a potential to emit 18.4 tons per year, above the major source threshold of 10 tons per year for any individual HAP, making the facility a major source of HAPs under the U.S. EPA's "once in, always in" policy in place at the time. Fritz submitted an application for a Renewable Operating Permit but is contesting the determination that the facility is a major source of HAPs with the U.S. EPA's recent rescinding of its "one in, always in" policy.

Note: PTI No. 15-01A includes conditions for an iron cupola which was never fully installed; installation was interrupted for more than 18 months, thus voiding the conditions in the PTI No. 15-01A relating to this emission unit. The facility submitted an application for a new permit, PTI No. 157-15, on August 26, 2015, to resume installation of the iron cupola, but withdrew the application and the application was voided on September 15, 2015.

Emission, production, and monitoring records from January 2017 through May 2018 were reviewed to evaluate compliance during this inspection. Copies of all records obtained can be found in the facility file.

EUReverbFurnace1 – Reverberatory furnace used to melt aluminum.

### **II. Material Limits:**

1. NOT DETERMINED. The facility provided records showing the amount of chlorine per ton of aluminum charge based on a monthly average. These records show the facility to be in compliance with the permit limit of 50 pounds of chlorine per ton; highest monthly average during the compliance evaluation period was 47.18 pounds of chlorine per ton of aluminum in June 2017; the monthly average for May 2018 was 26.71 pounds of chlorine per ton of aluminum. However, AQD believes compliance with this limit is required to be determined on an hourly basis, not monthly average. This is supported by the hourly recordkeeping

requirement of chlorine addition and the fact that HCl has an hourly screening level that was used in setting the HCl limit in the permit. Therefore, compliance with this condition is undetermined at this time due to noncompliance with the recordkeeping requirement in SC VI.2.

### III. Process/Operational Restrictions:

1. IN COMPLIANCE. Doors over the charge bin are kept closed when active loading is not taking place. Note: During the inspection, it was noted that there were large holes on the metal above the doors of the furnace, likely due to corrosion. This was also noted during the inspections performed on July 20 and September 20, 2017.
2. IN COMPLIANCE. Doors over fluxing well are kept closed when fluxing is not being performed.
3. NOT IN COMPLIANCE. The cyclone was removed and replaced with a spark arrestor in August 2017 without obtaining a permit to install modification. This violation was cited in the Violation Notice dated December 6, 2017. In its response to the violation, the facility stated the original cyclone was actually a spark arrestor and was replaced with a new spark arrestor which is functionally identical to the previous unit. However, PTI 15-01A and the Preventative Maintenance Plan clearly reference the use of a cyclone in conjunction with the baghouse; therefore, AQD has determined that Fritz remains in noncompliance with the requirement of this condition.

### VI. Monitoring/Recordkeeping:

1. IN COMPLIANCE. The amount of liquid chlorine used is monitored and recorded on a per hour and per day basis.
2. NOT IN COMPLIANCE. The amount of liquid chlorine used is not monitored and recorded on a pound per ton feed basis. The facility believes monitoring average hourly chlorine usage rate based on total monthly aluminum throughput sufficiently demonstrates compliance with this condition. AQD disagrees with this determination and considers Fritz to be in noncompliance with the requirements of this condition.

### VIII. Stack/Vent Restrictions:

1. IN COMPLIANCE. Reverb furnace stack appears to meet permit specifications.

EUCUPOLA – 25 ton per hour capacity grey iron cupola.

This emission unit was never fully installed. Since installation of the equipment was interrupted for more than 18 months of permit issuance, these conditions are no longer valid and were not evaluated during this inspection. Installation of the equipment described by this emission unit would require the application of a new permit to install.

EUCASTING – Cupola pouring and casting operations, including an electrically-heated holding vessel and water-cooled continuous caster.

This emission unit was never installed. Since installation of the equipment was interrupted for more than 18 months of permit issuance, these conditions are no longer valid and were not evaluated during this inspection. Installation of the equipment described by this emission unit would require the application of a new permit to install.

EULIMESILO – Lime injection air pollution control equipment storage silo and lime handling.

This emission unit was never installed. Since installation was not commenced within 18 months of permit issuance, these conditions are no longer valid and were not evaluated

during this inspection. Installation of the equipment described by this emission unit would require the application of a new permit to install.

FGAluminumMelt – This flexible group consists of EUReverbFurnace1 and EUPreheat (Rotary Drum Cylinder used to preheat aluminum fed into EUReverbFurnace1), controlled by a shared cyclone and baghouse.

**I. Emission Limits:**

Pollutant	Limit	Highest Reported Emissions	Compliance Status
1. PM	0.0095 lb./1,000 lb. exhaust gases	0.0015 lb./1,000 lb. exhaust gas <sup>a</sup>	IN COMPLIANCE
2. HCl	2.0 pounds per hour	1.58 pounds per hour <sup>a</sup>	IN COMPLIANCE
3. HCl	8.8 tons per 12-month rolling time period	6.1 tons in 12-month rolling time period ending May 2018.	IN COMPLIANCE
4. Visible Emissions, baghouse stack	5%, 6-minute average	0%, 6-minute average <sup>c</sup>	IN COMPLIANCE
5. Visible Emissions, fugitives	5%, 6-minute average	<5%, 6-minute average <sup>c</sup>	IN COMPLIANCE

<sup>a</sup>Based on results of emission testing performed September 11-12, 2014.

<sup>b</sup>Based on results of emission testing performed September 20, 2017.

<sup>c</sup>Testing per GC 13 has not been requested by AQD. Facility performs and records Method 9 visible emission readings on a daily basis. These records were reviewed during the inspection and appear to indicate the facility is operating in compliance with these opacity limits. No issues with visible emissions were noted during the inspection.

**II. Material Limits:**

Material	Limit	Highest Reported Usage	Compliance Status
Aluminum Throughput	60,000 tons per 12-month rolling time period	35,208 tons in 12-month rolling time period ending October 2017; 31,923 tons in 12-month rolling time period ending May 2018.	IN COMPLIANCE
Natural Gas Usage	96.36 MMscf per 12-month rolling time period	73.01 MMscf in 12-month rolling time period ending November 2017; 59.50 MMscf in 12-month rolling time period ending May 2018.	IN COMPLIANCE
Flux Fluoride Content Limit	5% by weight	Facility uses sodium chloride and potassium chloride as solid flux, which do not contain fluorides.	IN COMPLIANCE

**III. Process/Operational Restrictions**

1. IN COMPLIANCE. Fugitive dust control plan, as described in Appendix A, is implemented and maintained. During the inspections, I did not observe issues with fugitive dust on site nor track out onto Marion Ave.

2. IN COMPLIANCE. A Malfunction Abatement Plan (MAP) for the lime injection system and baghouse has been approved by AQD and is implemented and maintained. Per AQD request, an updated Operation, Maintenance, and Monitoring (OM&M) Plan, which includes the MAP, was submitted by Fritz on December 14, 2016.

**IV. Design/Equipment Parameters:**

1. NOT IN COMPLIANCE. The baghouse associated with FGAluminumMelt was not properly installed, operating, and maintained in accordance with OM&M Plan, including the MAP, while the equipment was in operation. The cyclone, as described in PTI 15-01A and the OM&M Plan ("cyclone mechanical separator") was completely removed and replaced by an in-duct spark arrestor with no cyclone in August 2017. This violation was cited in the Violation Notice dated December 6, 2017. In its response to the violation, the facility stated that the "cyclone mechanical separator" was only used as a spark arrestor and was replaced by a functionally identical unit, as allowed per R.285(2)(d). AQD disagrees with this determination and considers Fritz to be in noncompliance with the requirements of this condition.
2. NOT DETERMINED. Automatic lime injection system is installed, maintained, and operated in accordance with manufacturer's instructions and MAP. However, the facility has not demonstrated that the system is able to achieve 95% destruction efficiency through testing, as required in SC V.1, so compliance with the 95% destruction efficiency requirement is undetermined at this time.
3. IN COMPLIANCE. A device to monitor and record lime injection feed rate on a continuous basis is installed and maintained. The device is calibrated every six months, per the OM&M Plan, though the facility is currently performing calibration on a quarterly basis. The inspection and calibration records were reviewed during the inspection. Most recent calibration performed on June 18, 2018, by Controls Service, Inc.
4. IN COMPLIANCE. A device to monitor and record natural gas usage on a continuous basis is installed and maintained.
5. IN COMPLIANCE. A device to monitor and record baghouse pressure drop on a continuous basis for each baghouse is installed and maintained. Each device is calibrated every six months, per the OM&M Plan, though the facility is currently performing calibration on a quarterly basis. The inspection and calibration records were reviewed during the inspection. Most recent calibration performed on June 18, 2018, by Controls Service, Inc.

#### V. Testing/Sampling:

1. NOT IN COMPLIANCE. Performance testing to determine the HCl emission rate was performed on September 20, 2017. Testing to determine the PM emission rate was performed on September 11-12, 2014. However, the facility has not performed testing to verify 95% destruction efficiency of HCl in the baghouse/lime injection system. This violation was cited in the Violation Notice dated December 6, 2017. In its response to the violation, the facility stated that this testing is not required because modeling data at the time of permitting showed "HCl, HF, and Cl impacts were below the applicable screening levels." AQD disagrees with this determination and considers Fritz to be in noncompliance with the requirements of this condition.

#### VI. Monitoring/Recordkeeping:

1. IN COMPLIANCE. Required emission calculations and production records for FGAluminumMelt are calculated on a monthly and 12-month rolling time period basis and maintained in an acceptable format. These records were provided to AQD during the inspection.
2. IN COMPLIANCE. Aluminum throughput is recorded on a monthly and 12-month rolling time period basis.
3. IN COMPLIANCE. Natural gas usage is recorded on a monthly and 12-month rolling time period basis.
4. IN COMPLIANCE. HCl emissions are calculated and recorded on a monthly and 12-month rolling time period basis.
5. IN COMPLIANCE. Facility maintains a listing of the chemical composition of each flux material used, including the weight percent of each component. Copies of the material safety

data sheets were provided to AQD during the inspection.

6. IN COMPLIANCE. Lime slurry feed rate is monitored and recorded on a continuous basis.

7. IN COMPLIANCE. Pressure drop across each baghouse is monitored and recorded on a continuous basis.

VIII. Stack/Vent Restrictions:

1. IN COMPLIANCE. Baghouse stack dimensions appear to meet permit specifications.

IX. Other Requirements:

1. NOT IN COMPLIANCE. The facility is currently in enforcement action with U.S. EPA over noncompliance with the requirements of Subpart RRR and, as such, is determined to be in noncompliance with this condition. Therefore, a full evaluation of the facility's compliance with the provisions of Subpart RRR was not performed during this inspection. However, it was noted that the facility has not submitted semiannual compliance reports, as required per 40 CFR 60.1516(b). This violation was cited in the Violation Notice dated December 6, 2017. In its response to the violation, Fritz agreed to start submitting the semiannual compliance reports, if applicable, upon issuance of the Consent Agreement and Final Agreement (CAFO) resulting from the U.S. EPA's enforcement action.

Testing was performed on September 20, 2017, to demonstrate compliance with the D/F and HCl limits set in Table 1 of Subpart RRR for "new and existing group 1 furnace":

Pollutant	Subpart RRR Limit	Reported Emission Rate	Compliance Status
HCl	0.40 lb per ton of feed	0.25 lb per ton of feed	IN COMPLIANCE
D/F	2.1x10 <sup>-4</sup> gr D/F TEQ per ton of feed (15 micrograms D/F TEQ per megagram of feed)	5.3x10 <sup>-5</sup> gr D/F TEQ per ton of feed	IN COMPLIANCE

The testing on September 20, 2017, also established the minimum set points of 22.7 lb/hr for hydrated lime and 2.69 lb/hr for PAC; at the time of inspection, the facility was using automated set points of 24.0 lb/hr for hydrated lime and 3.2 lb/hr for PAC.

FGCUPOLA

This flexible group was never installed. Since installation was not commenced within 18 months of permit issuance, these conditions are no longer valid and were not evaluated during this inspection. Installation of the equipment described by this emission unit would require the application of a new permit to install.

FGFACILITY

I. Emission Limits:

Pollutant	Limit	Reported Emissions	Compliance Status
1. CO	342 tons per 12-month rolling time period	3.1 tons for 12-month rolling time period ending November 2017; 2.5 tons for 12-month rolling time period ending May 2018.	IN COMPLIANCE
2. NOx	69 tons per 12-month rolling time period	3.8 tons for 12-month rolling time period ending November 2017; 3.1 tons for 12-month rolling time	IN COMPLIANCE



		period ending May 2018.	
3. SO <sub>2</sub>	97 tons per 12-month rolling time period	0.37 tons for 12-month rolling time period ending November 2017; 0.34 tons for 12-month rolling time period ending May 2018.	IN COMPLIANCE
4. VOC	41 tons per 12-month rolling time period	2.7 tons for 12-month rolling time period ending November 2017; 2.4 tons for 12-month rolling time period ending May 2018.	IN COMPLIANCE
5. PM	35 tons per 12-month rolling time period	1.5 tons for 12-month rolling time period ending May 2018.	IN COMPLIANCE
6. PM10	22 tons per 12-month rolling time period	1.5 tons for 12-month rolling time period ending May 2018.	IN COMPLIANCE
7. Individual HAP	Less than 10.0 tons per 12-month rolling time period	6.1 tons of HCl for 12-month rolling time period ending May 2018.	IN COMPLIANCE
8. Aggregate HAPs	Less than 24.0 tons per 12-month rolling time period	6.1 tons of HCl for 12-month rolling time period ending May 2018. <sup>a</sup>	IN COMPLIANCE

a. The facility reports HCl as the only HAP of significance. Since the facility currently uses a non-fluoride flux, emissions of hydrogen fluoride (HF) are not calculated.

### III. Process/Operational Restrictions:

1. NOT EVALUATED. The emission unit subject to Subpart ZZZZZ was never installed, so this condition was not evaluated.
2. IN COMPLIANCE. Facility implements and maintains an approved Fugitive Dust Plan. Records are maintained on site and were reviewed by AQD during the inspection.

### VI. Monitoring/Recordkeeping:

1. IN COMPLIANCE. Facility maintains a spreadsheet to calculate emissions from FGFACILITY.
2. IN COMPLIANCE. Facility calculates and maintains records for CO, NO<sub>x</sub>, SO<sub>2</sub>, VOC, PM, PM10, and individual and aggregate HAPs on a monthly and 12-month rolling basis, as required.
3. NOT EVALUATED. The emission unit subject to Subpart ZZZZZ was never installed, so this condition was not evaluated.
4. NOT EVALUATED. The emission unit subject to Subpart ZZZZZ was never installed, so this condition was not evaluated.
5. IN COMPLIANCE. Facility maintains records and calculations for FGFACILITY in an acceptable format.
6. NOT EVALUATED. The emission unit subject to Subpart ZZZZZ was never installed, so this condition was not evaluated.

### VII. Reporting:

- 1 through 4. NOT EVALUATED. The emission unit subject to Subpart ZZZZZ was never installed, so these conditions was not evaluated.

### Additional Permits

The following permits have been issued to Fritz but will be voided because the equipment was either never installed, has been removed, or is now covered by PTI No. 15-01A:

- PTI No. 90-11, issued on September 19, 2011, for a 2.5-ton/hour capacity copper melting furnace. This emission unit was removed from this site and shipped to a Fritz facility in Arizona.
- PTI No. 39-10, issued on May 18, 2010, for an 8-ton/hour capacity nickel melting furnace. This emission unit was never installed.
- Wayne County Permit Nos. C-10062 through C-10064, issued on September 24, 1993, for an aluminum dross cooler with two baghouses. This equipment is no longer in operation.
- Wayne County Permit Nos. C-3945 through C-3956, issued on May 18, 1977, for an iron oxide pelletizing and sintering plant. This equipment is no longer in operation.
- Wayne County Permit Nos. C-7095 through C-7101, for three coreless induction furnaces, induction drum holding furnace, vertical channel induction furnace, and scrap pre-heater. These permits are in the AQD permit database. The Wayne County permit log book shows these applications as being received on September 10, 1985, but do not indicate that these permits were ever approved and issued.

### **FINAL COMPLIANCE DETERMINATION:**

At the time of inspection, Fritz was determined to be in noncompliance with the following conditions of PTI No. 15-01A:

- EUReverbFurnace1, SC III.3: Cyclone of the baghouse system was not properly installed and operated at the time of the inspections. Cyclone has been removed and replaced with an in-duct spark arrestor.
- EUReverbFurnace1, SC VI.2: Facility failed to monitor and record the amount of liquid chlorine used on a pound per ton feed basis.
- FGAluminumMelt, SC IV.1: 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, SC V.1: Facility has not conducted performance testing to demonstrate compliance with the 95% control efficiency of the lime injection system and baghouse.
- FGAluminumMelt, SC IX.1: The facility is currently in enforcement action with U.S. EPA over noncompliance with the requirements of Subpart RRR and, as such, is determined to be in noncompliance with this condition. Therefore, a full evaluation of the facility's compliance with the provisions of Subpart RRR was not performed during this inspection, and violations cited in the U.S. EPA's Finding of Violation letter will be addressed through the U.S. EPA's current enforcement action. However, it was noted that the facility has not submitted semiannual compliance reports since 2014, as required per 40 CFR 60.1516(b); this violation was not included in the U.S. EPA's initial Finding of Violation, so it will be specifically addressed as a violation as part of this compliance evaluation.

In addition, compliance with the following conditions were unable to be determined at this time due to noncompliant conditions listed above and will need to be evaluated once the information required to determine compliance is submitted to AQD:

