



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



DAN WYANT
DIRECTOR

January 13, 2014

Mr. Dave Splan, Vice President
Fritz Products Inc.
255 Marion Street
River Rouge, MI 48218

SRN: M4547, Wayne County

Dear Mr. Splan:

VIOLATION NOTICE

On October 29, 2013, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the results of the HCl, PM, and D/F emissions stack test conducted on August 28, 2013 at Fritz Products, Inc. located at 255 Marion Street, River Rouge, Michigan. The purpose of this stack test was to determine Fritz Products Inc.'s 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 administrative rules, Permit To Install 15-01A, and 40 CFR Part 63 Subpart RRR.

Based on a review of the stack test results, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGALUMINUMMELT	PTI 15-01A, S.C. I.2	Based on the August 2013 stack test, HCl emissions were 4.2 lb/hr. The permit limit for HCl is 2.0 lb/hr.
FGALUMINUMMELT	PTI 15-01A, S.C. I.3	Based on an emission rate of 4.2 lb/hr, annual emissions are 18.4 tpy of HCl. The permit limit for HCl is 8.8 tpy.
FGFACILITY	PTI 15-01A, S.C.I.7	Based on an emission rate of 4.2 lb/hr, annual emissions are 18.4 tpy of HCl. The permit limit for the entire facility for an individual HAP is less than 10.0 tpy.
FGFACILITY	R 336.1210	The potential to emit is greater than 10 tons per year for an individual Hazardous Air Pollutant, requiring the source to obtain a Renewable Operating Permit (ROP).
FGALUMINUMMELT	40 CFR 63.1505(i)(4)	Based on the August 2013 stack test, HCl emissions were 0.75 lb/ton of feed. The NESHAP Subpart RRR limit for HCl is 0.40 lb/ton of feed.
FGFACILITY	40 CFR 63.1501	Failure to comply with all applicable major source provisions of NESHAP Subpart RRR by the compliance date.

A major source is defined as any source (facility) that actually emits or has the potential to emit (PTE) 10 tons per year (tpy) of any hazardous air pollutant, 25 tons per year of any combination of hazardous air pollutants, or 100 tons per year of any criteria pollutant (NO_x, Sulfur Dioxide, Carbon Monoxide, Particulate Matter, Volatile Organic Compounds, or Lead).

Based on the stack test results, Fritz Products, Inc. is a major source under R336.1211 as the PTE of hydrogen chloride, also known as hydrochloric acid (HCl), CAS # 7647010, exceeds the major source threshold of 10 tpy. The results of the August 28, 2013, performance test demonstrated an average HCl emission rate of 4.2 lb/hr. When extrapolated to an annual rate, the HCl emissions equate to 18.4 tpy from the facility.

Under the State of Michigan's Air Pollution Control law and the federal Clean Air Act, a Renewable Operating Permit (ROP) program has been developed and implemented in Michigan. This program requires major sources of air emissions to obtain a facility-wide air use permit. This permit serves as a mechanism for consolidating and clarifying all air pollution control requirements which apply to the source. Rule 210(5) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), requires major sources to submit an application to the DEQ, AQD not more than 12 months after a stationary source commences operation as a major source, as defined by Rule 211(1)(a) of Act 451.

To date, the AQD has not received an ROP application from Fritz Products Inc. This constitutes a violation of Rule 210(1) of Act 451 which requires that a source not operate any emission units at a source required to obtain a ROP unless a timely and administratively complete application has been received by the DEQ. As a result of the failure to submit a timely and administratively complete application in accordance with the requirements of Rule 210(5) of Act 451, this facility has failed to obtain an "application shield".

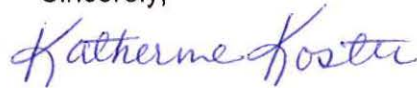
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 3, 2014 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of 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

If Fritz Products, 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 AQD staff during the inspection of Fritz Products, 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,



Katherine Koster
Senior Environmental Engineer
Air Quality Division
313-456-4678

cc: Ms. Katy Bellairs, EPA Region V
cc via email: Ms. Lynn Fielder, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ