



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREETHER  
DIRECTOR

October 12, 2016

Mr. David Splan, Vice President  
Fritz Enterprises, Inc.  
1650 West Jefferson Ave.  
Trenton, MI 48183

SRN: M4547, Wayne County

Dear Mr. Splan:

**VIOLATION NOTICE**

On September 18, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an investigation of Fritz Enterprises, Inc. (FEI), located at 255 Marion Ave., River Rouge, Michigan. The purpose of this investigation was to determine FEI'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 Air Pollution Control Rules; the conditions of Permit to Install (PTI) number 15-01A; and to investigate the cause of visible emissions which were observed from FEI's operations.

During the investigation, AQD staff performed Method 9 visible emission (VE) readings of the roof of the building housing the secondary aluminum furnace and noted the following violations:

Process Description	Rule/Permit Condition Violated	Comments
FGAluminumMelt	PTI No. 15-01A, FGAluminumMelt, S.C. 1.4;  R. 336.1301(1)(c)	Visible emissions exceeded 5% over a 6-minute average a total of five times from 12:53 PM to 1:20 PM; The highest 6-minute average was 56%
FGAluminumMelt	PTI No. 15-01A, FGAluminumMelt, S.C. IV.1 and 2;  R. 336.1910	Emissions were not properly controlled by baghouse and lime injection system.

AQD staff performed Method 9 VE readings from 12:53 PM to 1:20 PM on September 28, 2016, of the roof of the building housing the secondary aluminum furnace; the furnace was in operation at this time. During the time the Method 9 readings were performed, the 6-minute average opacity exceeded the 5% opacity limit allowed in PTI No. 15-01A, FGAluminumMelt, Special Condition 1.4, a total of five times; the highest 6-minute opacity observed was 56% from 12:53 to 12:59 PM. Copies of the Method 9 VE

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readings are included with this letter. AQD staff also performed non-certified VE readings from 1:20 PM to 1:45 PM, during which time visible emissions continued.

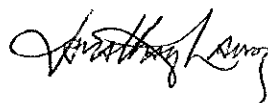
PTI No. 15-01A, FGAluminumMelt, Special Conditions IV. 1 and 2, states that FGAluminumMelt shall not be operated unless the baghouse and lime injection system is installed, operated, and maintained; this includes the hoods and ducts used to capture and exhaust emissions from the secondary aluminum furnace to the baghouse and lime injection system. During this investigation, emissions from the secondary aluminum furnace were not effectively captured by the control system due to failure of the ductwork, allowing the emissions to vent uncontrolled to atmosphere, in violation of PTI No. 15-01A, FGAluminumMelt, S.C. IV.1 and 2, and Rule 910.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 2, 2016 (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 FEI 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. 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,



Jonathan Lamb  
Senior Environmental Quality Analyst  
Air Quality Division  
313-456-4683

Enclosure

cc via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ