

November 1, 2016

Mr. Jonathan Lamb  
Senior Environmental Quality Analyst  
Department of Environmental Quality/Air Quality Division  
Cadillac Place  
3058 W. Grand Blvd., Suite 2-300  
Detroit, Michigan 48202-6058

Dear Mr. Lamb:

Fritz Enterprises, Inc. (FEI) has received and reviewed the Violation Notice (VN), which was issued by the Department of Environmental Quality/Air Quality Division (MDEQ/AQD) ON October 12, 2016. The VN alleged the following two violations:

1. The visible emissions from FEI's River Rouge Plant 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%; thereby, in violation of Special Condition (SC) No.I.4 of FGAluminumMelt Table of PTI No. 15-01A, and R. 336.1301(1)(c).
2. The emissions from FEI's River Rouge Plant were not properly controlled by the FG's baghouse and lime injection system; thereby, in violation of SC No. IV.1 and 2 of FGAluminumMelt Table of PTI No. 15-01A, and R. 336.1910.

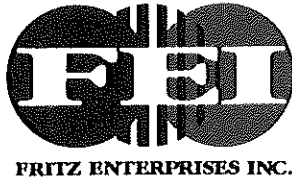
The VN requested that FEI initiate actions necessary to correct the above alleged cited two violations and submit a written response to the MDEQ/AQD by November 2, 2016.

On September 20, 2016, FEI submitted the following explanation of the malfunction incident in an email message:

The refractory lined duct pipeline from the furnace to the preheat drum failed on Sunday, 9/18/2016. Apparently, the refractory lining failed inside the duct due to wear and tear conditions, and the hot gasses flowing through the pipeline burned a hole in the metal exterior of the 90 degree elbow. Please see the attached photo of the failed pipeline (Exhibit 1). Consequently, the plant shift foreman reacted immediately and stopped the aluminum scrap feed to the furnace, started investigating the situation, and cleaned out the furnace's reaction well. Upon discovering the hole in the duct pipeline, the plant maintenance crew patched the duct line hole with a fiber blanket (aka, Kwool). Obviously, this was an immediate and preliminary fix. Please see the attached photos of the patched pipeline (Exhibit 2). Ultimately, a new refractory lined pipeline was ordered and installed. The installation was completed on September 30, 2016.

It was estimated that the duration of the breakdown of the pipeline had lasted 3 hours (12:00 Noon – 3:00 PM). Please see the attached Equipment Malfunction or Breakdown Report (Exhibit 3), which was documented pursuant to FEI's Standard Plant Operations Procedures. The baghouse collection system was in its normal operational mode during this incident.

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In order to prevent a reoccurrence of a similar pipeline failure, FEI has initiated and continues to implement the following activities:

- 1) Increase the frequency of the inspection of the said pipeline to twice per week in order to insure the preservation of its integrity.
- 2) Document the inspection activities on a regular basis. Copy of the frequent inspection record sheets are attached (Exhibit 4.1 & 4.2).
- 3) Purchased and is using a hand-held laser thermometer (made by Amprobe) to measure the pipeline outer temperature at different locations of the pipeline. Abnormal temperatures exceeding 600° F should result in a stoppage of the scrap aluminum charge to the furnace. Pictures of the thermometer are attached (Exhibit 5).
- 4) All shift foremen were instructed that in case of an Equipment Malfunction or Breakdown to immediately suspend the charge operations of scrap aluminum to the furnace, initiate a thorough investigation action, and resolve the malfunction immediately.

FEI asserts the following facts and observations regarding the above pipeline failure incident of September 18, 2016:

- FEI has regained, and is maintaining, compliance with all of the conditions of PTI No. 15-01A in an expeditious fashion.
- The excess visible emissions were a result of a sudden and unavoidable breakdown of the preheater pipeline, and beyond the control of FEI. This was consistent with the provisions of R 915(3)(a).
- The plant's baghouse collection system was maintained and operated in a manner consistent with good practice of minimizing emissions and pursuant to FEI's Standard Plant Operations Procedures. This was consistent with the provisions of R 915(3)(b) and (i).
- Repairs to the failed preheater pipeline were made in an expeditious fashion as soon as the failure was discovered. This was consistent with the provisions of R 915(3)(d).
- The amount and duration of excess emissions were minimized to the maximum extent practicable during periods of the emissions. This was consistent with the provisions of R 915(3)(e).
- FEI's shift foreman immediately stopped the scrap aluminum charge to the furnace, initiated an investigation action of the incident, and cleaned out the inside of the furnace. The maintenance department staff responded immediately to make the necessary repairs to the failed pipeline and were able to stop the visible emissions within 2 hours of the knowledge of the incident. This was consistent with the provisions of R 915(3)(f).
- This kind of pipeline failure was not part of a recurring pattern indicative of inadequate design, operation, or maintenance. The pipeline failure was a sudden and unavoidable breakdown and a result of wear-and-tear conditions. This was consistent with the provisions of R 915(3)(g) and (h).

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FRITZ ENTERPRISES INC.

Thank you for granting FEI the opportunity to review and respond to the Violation Notice of October 12, 2016. We hope to have adequately responded to the concerns of the MDEQ/AQD and consummated a resolution of the said Notice. If you have any concern or require further information, please contact me at your earliest convenience.

Sincerely,

A handwritten signature in blue ink, appearing to read 'U. Sam Amer', is written over a light blue horizontal line.

U. Sam Amer  
Environmental Manager

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Exhibit 1

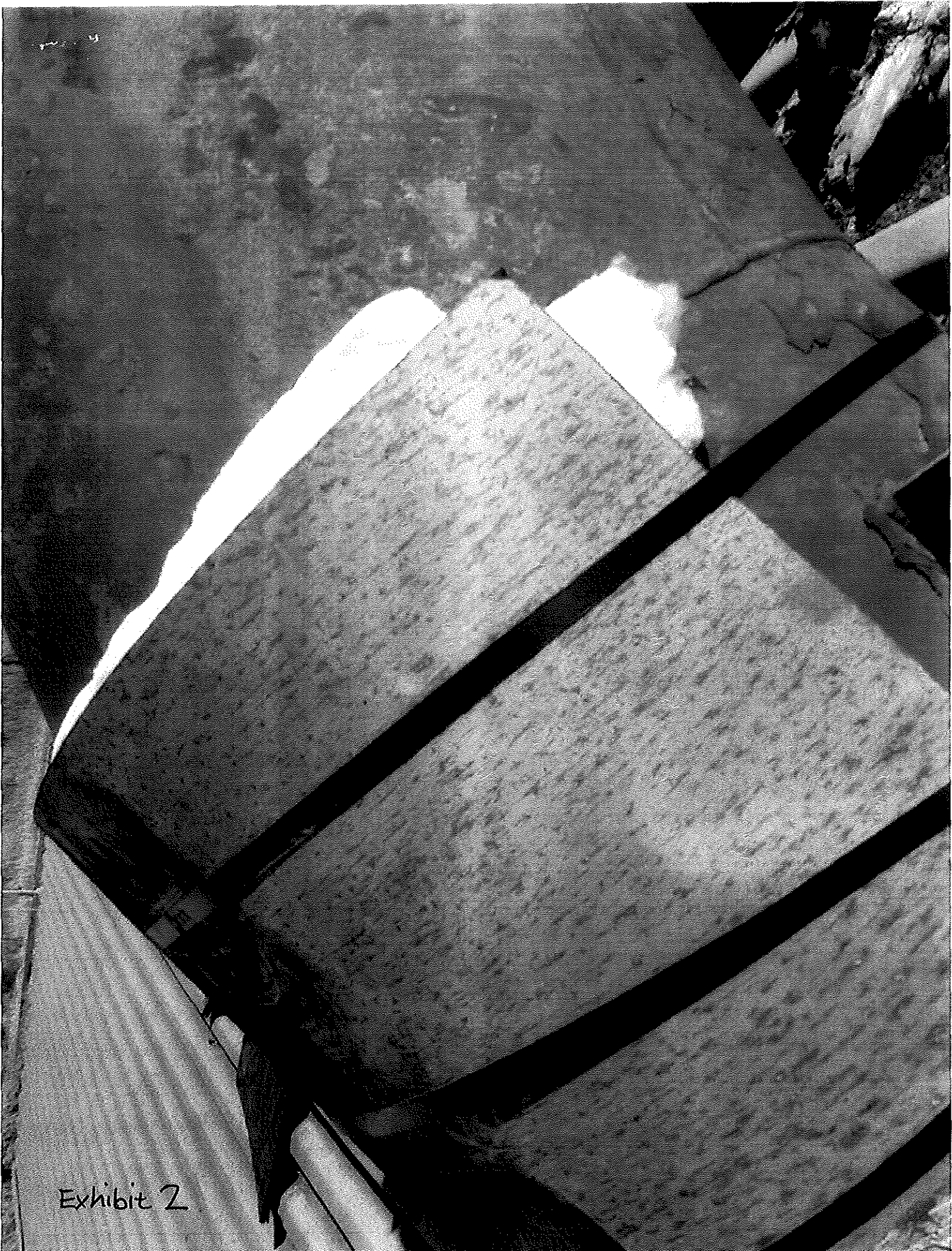
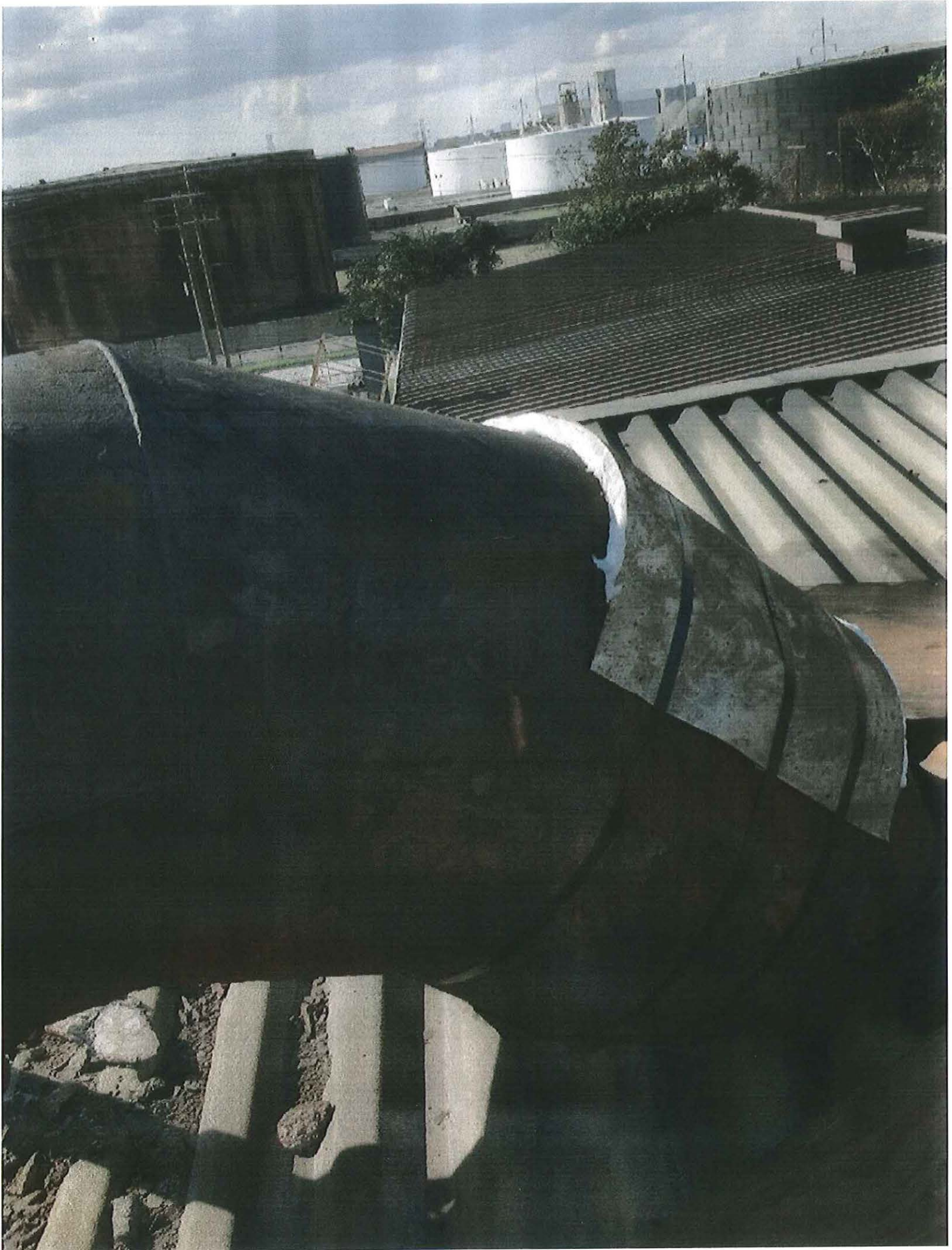


Exhibit 2



**FRITZ ENTERPRISES INC.  
RIVER ROUGE ALUMINUM FACILITY**

**EQUIPMENT MALFUNCTION OR BREAKDOWN REPORT**

[Note: For use only by Fritz Environmental Management to report to MDEQ]

1)	Name (Person Reporting Breakdown):	<u>Kenneth Filipkowski</u>	
2)	Title: <u>Foreman</u>	Phone:	_____
3)	Company Name:	<u>Fritz Enterprises</u>	
4)	Mailing Address:	<u>1650 W. Jefferson, Trenton, MI 48183</u>	
5)	Plant Location:	<u>River Rouge, MI</u>	
6)	Source:	<u>Aluminum Facility</u>	
7)	Type of Equipment:	<u>Reveratory Furnace</u>	
8)	Date of Breakdown: <u>9-18-16</u>	Time of Breakdown:	<u>12:00 pm</u>
9)	Estimated Duration of Breakdown:	<u>3 hours</u>	
10)	Nature of Breakdown or Malfunction:	<u>Hole in duct work refractory fell out of Inside of duct Burned hole thru metal</u>	
11)	Potential Air Pollution Problems Created: (Type and Amount)	<u>Smoke coming out hole in duct work Notice Smoke At 12:00pm</u>	
12)	Corrective Action(s) Taken (Initiated within 1 working day):	<u>12:00pm Stopped Feed system 1:00pm clean out Reaction well. 1:10pm @ 125 clean out inside furnace. Maintenance came in 2:30pm Patched Hole in duct work</u>	
13)	Date of Initiation of Repair/Replacement/Corrective Action:	<u>9-18-16</u>	
14)	Date of Completion of Repair/Replacement/Corrective Action:	<u>9-18-16</u>	
15)	Corrective Actions consistent with Startup, Shutdown, Corrective Action Plan?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
16)	Additional Comments/Explanation:	<u>New Refractory lined duct will be ordered 9-19-16 to replace older existing duct.</u>	
	Signature <u>Kenneth Filipkowski</u>	<u>9-18-16</u>	
17)	David Splan, Vice President, Environmental Mgmt	Signature: <u>[Signature]</u>	Date: <u>9-19-16</u>

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Exhibit 3









Exhibit 5