



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
LANSING DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

August 29, 2022

Sam Amer, Corporate Environmental Manager  
Fritz Enterprises, Incorporated  
1650 West Jefferson  
Trenton, Michigan 48183

SRN: N6823, Genesee County

Dear Sam Amer:

**VIOLATION NOTICE**

On April 20, 2022, staff of the United State Environmental Protection Agency (EPA), and the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Fritz Enterprises of Flint (Fritz Enterprises) located at 5032 N. Dort Highway, Flint, Michigan. The purpose of this inspection was to determine Fritz Enterprises' 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 92-00B; and to follow up on an April 12, 2022 inspection by EGLE's Materials Management Division (MMD), in which MMD staff observed numerous pieces of paper being emitted from the wet scrubber exhaust stack.

Based upon the EPA and AQD inspection of April 20, 2022, and on documentation from April 12, 2022, provided by MMD, the following violations have been determined:

Process Description	Rule/Permit Condition Violated	Comments
EU-ZBOX	PTI No. 92-00B, IV.1, Rules 901(b) and 910	Numerous pieces of paper were witnessed by EGLE MMD staff on April 12, 2022, as being emitted from the wet scrubber stack, with some leaving the site, causing a nuisance. This also indicates that the cyclone and wet scrubber were not being operated in a satisfactory manner.
FG-SHREDDEROP	PTI No. 92-00B, FG-SHREDDEROP, SC III.7.	Waste materials (papers) were not contained and disposed of in an acceptable

		manner, as witnessed by MMD staff on April 12, 2022.
FG-SHREDDEROP	PTI No. 92-00B, FG-SHREDDEROP, SC III.8.	The written plan demonstrating compliance with SCs III.1 through III.5 was not maintained, as plan identifies “Excessive Trash” being unacceptable in received items to be processed, yet a large quantity of paper entered the shredder on April 12, 2022.
EU-ZBOX	PTI No. 92-00B, EU-ZBOX Special Condition (SC) IV.1., and VI.1, and Rule 910.	The pressure drop gauge and liquid flow indicator for the wet scrubber were found to be inoperable, on April 20, 2022 .
FG-SHREDDEROP	PTI No. 92-00B, FG-SHREDDEROP, SC III.6.	Some fluff materials were not stored in 3-sided bunkers on April 20, 2022.

On April 12, 2022, EGLE MMD staff were conducting an inspection of Fritz Enterprises. During their inspection, they observed numerous pieces of paper emitted by the wet scrubber which, along with a cyclone, is the air pollution control device for EU-ZBOX. MMD’s Evin Maguire noted that some of the papers left the site. In the professional judgement of AQD staff, the waste papers landing offsite were sufficient to constitute a violation of Rule 901(b) of the administrative rules promulgated under Act 451, which prohibits unreasonable interference with the comfortable enjoyment of life and property.

The large number of papers passing through the scrubber uncontrolled also indicate a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

The April 12, 2022, observation of waste papers leaving the wet scrubber also demonstrates that waste materials were not being stored in an acceptable manner. This is a violation of PTI No. 92-00B, FG-SHREDDEROP, SC III.7, which requires in part that all waste materials generated by FG-SHREDDEROP shall be contained and disposed of or recycled in an acceptable manner in compliance with all applicable state and federal rules and regulations.

During the April 20, 2022, joint inspection by EPA and AQD, it was observed that the pressure drop gauge and liquid flow indicator for the wet scrubber which controls EU-ZBOX were inoperable. This is a violation of PTI No. 92-00B, EU-ZBOX SC IV.1, which requires that the wet scrubber be installed, maintained, and operated in a satisfactory manner, as well as a violation of EU-ZBOX SC VI.1, which requires the permittee to install, maintain and operate a pressure drop gauge and a liquid flow indicator on the wet scrubber portion of EU-ZBOX. It is also a violation of Rule 910, which, as previously noted, requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Lastly, on April 20, 2022, it was noted that some fluff materials were not stored in 3-sided bunkers. This is a violation of PTI No. 92-00B, FG-SHREDDEROP SC III.6, which requires that the permittee shall store all non-ferrous, non-metal, and waste materials (i.e., fluff) generated by FG-SHREDDEROP in 3-sided bunkers.

Be aware that state and federal air pollution regulations prohibit Fritz Enterprises from obtaining any new permits for major offset sources located in Michigan until the cited violation(s) are corrected or until Fritz Enterprises has entered a legally enforceable order or judgment specifying an acceptable program and schedule for compliance.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 19, 2022 (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 EGLE, AQD, Lansing District, at Constitution Hall, First Floor South, P.O. Box 30242, Lansing, Michigan 48909 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Fritz Enterprises 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.

Sam Amer  
Fritz Enterprises, Incorporated  
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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to EPA and AQD during our inspection of Fritz Enterprises. 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,



Daniel A. McGeen  
Environmental Quality Analyst  
Air Quality Division  
517-648-7547

cc: Emma Leeds, EPA  
David Sutlin, EPA  
Mary Ann Dolehanty, EGLE  
Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Bob Byrnes, EGLE  
Bryan Grochowski, EGLE  
Evin Maguire, EGLE