

FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY

SITE OPERATING PERMIT (SOP) RENEWAL

Permit #:	03563	Company:	Fritz Industries, Inc.
Project #:	35096	Site:	Fritz Industries
Regulated Entity #:	RN100218023	Application Area:	Fritz Industries - Mesquite Facility
Region:	4	Customer #:	CN600386585
NAICS Code:	325998	County:	Dallas
Permit Reviewer:	Savannah Quiros	NAICS Name:	All Other Miscellaneous Chemical Product Manufacturing

SITE INFORMATION

Physical Location: 500 N Sam Houston Rd
Nearest City: Mesquite
Major Pollutants: VOC
Additional FOPs: None

PROJECT SUMMARY

Fritz Industries, Inc.'s Mesquite Facility is a chemical product manufacturing facility subject to the requirement of 30 TAC Chapter 122. The Federal Operating Permit (FOP) was last renewed November 9, 2018 (Permit # 03563). A timely renewal application was received by TCEQ on May 8, 2023. Significant emission sources at the site include boilers and stationary vents, which are subject to state and/or federal regulations. The FOP includes general and special terms and conditions and unit-specific applicable requirements which were identified using information provided by the applicant in various forms (OP-SUMR, OP-REQ1, OP-REQ2, OP-REQ3, OP-PBRSUP and various Unit Attribute forms).

PROCESS DESCRIPTION

The Mesquite Facility produces various types of oil field compounds by coating core materials in 10 encapsulators (coaters) and 4 mullers (mixers). Coatings are mixed according to prescribed compound formulas.

Encapsulator Operations:

Coating is pumped to an air atomized spray head inside the expansion chamber of the coater. The air is used to bombard the coating and create small coating droplets, which allow for more even coating of the suspended particles. A blower draws filtered ambient air, which is passed through a steam heat exchanger, then blown into the air plenum at the base of the chamber for particle suspension and drying. Three 200 hp boilers provide steam to the coaters.

The coating process is initiated by placing the core material in the product bowl, located in the unit above the air plenum. The material is lifted into the expansion chamber by air and coated to the desired size while in suspension. At the end of the coating process, the material is allowed to fall back into the product bowl.

Once the coating process is complete, the product bowl is removed from the coater and inverted over a screening unit, where it is sifted through the screen to remove large pieces. The finished product is stored in 50-pound storage drums for shipping.

Muller Operations:

Mixers are used to coat ground walnut hulls with an epoxy resin, and to manufacture products that are sold to the oil field industry to retain sand in the well hole during drilling operations.

Specified quantities of epoxy resin and hardener are initially mixed in a five-gallon container. Ground walnut hulls are dropped from a 2,000-pound bulk bag into an open-top mixer before the resin mixture is added. The materials are then mixed for approximately 1 hour. The finished product is then dumped into a hopper, packaged, and shipped to customers.

TECHNICAL REVIEW

Permit Content Summary

1. Was Periodic Monitoring (PM) required and included in the permit?..... No

2. Was Compliance Assurance Monitoring (CAM) required and included in the permit?..... No
3. Was case-by-case PM or CAM included in the permit?..... No
4. Was a permit shield requested?..... Yes
5. If a permit shield was requested, was any permit shield request denied?..... Yes
6. Identify if the following are applicable for this project:
 - (a) Manually-built applicable requirements..... No
 - (b) Customized Special Terms and Conditions..... Yes
 - (c) Manual changes to the IMS-generated applicable requirements..... No
 - (d) Alternate means of compliance for any emission unit/source at the site..... No
7. Is the site subject to the requirements of 40 CFR Part 72 (Acid Rain Permit)?..... No
8. Did the applicant's review/comments on the working draft permit result in changes to the permit content?..... No
9. Will the draft permit be sent to public notice with unresolved issues (i.e., disagreements with applicant)?..... No

Permit reviewer notes:

- Permit shields were requested for Unit ID GRPCOATERS for 30 TAC Chapter 115, Vent Gas Controls (negative applicability citations 30 TAC 115.127(a)(2)(A) and 115.127(a)(2)(B)). Permit shields were denied because these exemptions from control still have some associated applicable requirements.
- The existing permit shield was reviewed and is still valid.
- Permit Term 6 (IMS term B.142) was customized to identify the current project number and submittal date on Form OP-PBRSUP.

Statement of Basis

A Statement of Basis sets forth the legal and factual basis for the applicable requirements that are included in the FOP. A Statement of Basis was prepared for this project and is included in the permit file.

Compliance History Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on December 7, 2023.
 Site rating: 0.00 / High Company rating: 0.00 / High
 (*High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55*)
2. Has the permit changed on the basis of the compliance history or site/company rating?..... No

Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS?..... No
2. Is a compliance plan and schedule included in the permit?..... No

Delinquent Fee Check

1. The delinquent fee check was performed on 12/13/2023.
2. Were there any delinquent fees owed? No

Public Notice Information

1. Were comments received from the applicant after the draft permit was mailed and before Public Notice was published?..... No
2. Was a revised draft permit or public notice authorization package (PN-Errata) sent for any reason?..... No
3. Publication date: March 3, 2024 Newspaper name: Mesquite News
4. Was bilingual public notice published?..... Yes
 Publication date: March 5, 2024 Newspaper name: La Prensa Comunidad
5. Were comments received during Public Notice period?..... Yes
 - (a) Was a public hearing requested?..... Yes
 - (b) Was a public hearing held?..... No
 - (c) Was the public hearing request withdrawn?..... No
 - (d) Was permit content changed as a result of any public comments?..... No
6. Was re-publication necessary?..... No

Permit reviewer notes:

- A public comment was received during the Public Notice period on 03/26/2024. In the comment, a public hearing

was requested. The executive director determined that the apparent public hearing request, stated as "I think a public hearing is appropriate", is not reasonable based on a lack of a significant degree of public interest and, therefore, the public hearing request was denied.

- The CID was checked 10/02/2024 to verify that no additional comments were received.

EPA Review

1. Did EPA comment on the draft permit?..... No
2. Was a separate NOPP - Notice of Proposed Permit sent to the EPA?..... Yes
If yes, did the EPA comment on the proposed permit?..... No
3. Were any changes made to the permit after the EPA Review Period?..... No
If yes, were these changes made within the 60 day Public Petition Period?..... NA

Permit reviewer notes:

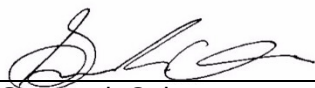
- The CID was checked 10/02/2024 to verify that no EPA comments were received.

IMPORTANT MILESTONES

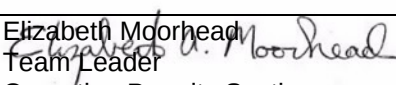
Milestone (Standard)	Start Date	End Date
Date Application Received by TCEQ	05/08/2023	
Date Project Received by Engineer	05/31/2023	
Technical Review Period	07/26/2023	01/17/2024
Working Draft Permit Reviewed by Applicant	11/15/2023	11/28/2023
Date PNAP/Draft Permit Mailed	02/21/2024	
Public Notice Comment Period	03/03/2024	04/02/2024
EPA Review Period	08/13/2024	09/27/2024
Date Sign Posting Certification Received	04/08/2024	

Milestone (Optional)	Start Date	End Date
Date Comment on Draft Permit Received from Public	03/26/2024	
Date Public Hearing Requested	03/26/2024	(Request Denied)

EFFECTIVE PERMIT ISSUANCE DATE: October 9, 2024


 Savannah Quiros
 Permit Reviewer
 Operating Permits Section
 Air Permits Division

10/02/2024
Date


 Elizabeth Moorhead
 Team Leader
 Operating Permits Section
 Air Permit Division

10/02/2024
Date

CONTACT INFORMATION

Responsible Official:

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