



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

September 12, 2019

Mr. Bob Watters, General Manager  
Shrader Tire & Oil  
25445 Outer Drive  
Melvindale, MI 48122

SRN: B4734, Wayne County

Dear Mr. Watters:

**VIOLATION NOTICE**

On May 13, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection of Shrader Tire & Oil located at 25445 Outer Drive, Melvindale, Michigan. The purpose of this inspection was to determine Shrader Tire and Oil'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; and the conditions of Permit to Install (PTI) No. 126-06A.

During the inspection, the following violations were observed:

Process Description	Rule/Permit Condition Violated	Comments
Tire Buffing	PTI No. 126-06A, FG Tire Retreading, Special Conditions 1.6 and 1.12a.	Material handling trailer has vents on the side of the trailer allowing emissions to exhaust prior to the stack.
Rim Reconditioning	R 336.1201	Failure to obtain a Permit to Install for the rim bake-off oven

During the inspection, AQD staff observed particulate emitting from vents on the side of the trailer which stores the crumb rubber after buffing. PTI No. 126-06A, Special Condition 1.12a requires emissions from the Tire Buffing & Repair to "discharge unobstructed vertically upwards to the ambient air" and through a stack with the diameter and height as specified in the special condition. The vents on the trailer allowed emissions to bypass the stack, which is also a violation of PTI No. 126-06A, Special Condition 1.6, as the material handling system is not "installed, maintained, and operated in a satisfactory manner."

During the inspection, AQD staff also noted that the facility installed a bake-off oven for the rim reconditioning system without obtaining a Permit to Install, as required per R 336.1201 of the State of Michigan Air Pollution Control Rules.

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In addition, AQD is requesting per PTI No. 126-06A, General Condition 13, that Shrader Tire & Oil conduct emission testing to demonstrate compliance with the PM and PM<sub>10</sub> emission limits in PTI No. 126-06A, Special Conditions 1.1b and 1.1c.

AQD is also requesting that Shrader Tire & Oil perform an exemption analysis pursuant to R 336.1278a for the tanks in the bulk plant to determine if the facility is required to obtain a Permit to Install for those tanks.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 3, 2019 (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 the EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Shrader Tire & Oil 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 and for the cooperation that was extended to me during my inspection of Shrader Tire & Oil. 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

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Jenine Camilleri, EGLE  
Ms. Wilhemina McLemore, EGLE  
Mr. Jeff Korniski, EGLE