

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

P052463612

FACILITY: ENVIRONMENTAL RUBBER RECYCLING		SRN / ID: P0524
LOCATION: 6515 N. DORT HIGHWAY, FLINT		DISTRICT: Lansing
CITY: FLINT		COUNTY: GENESEE
CONTACT: Bud Dingus , Plant Manager		ACTIVITY DATE: 07/13/2022
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced inspection of facility which was last inspected by AQD in 2006.		
RESOLVED COMPLAINTS:		

On July 13, 2022, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an unannounced inspection of Environmental Rubber Recycling, which had last been inspected by AQD in 2006.

Environmental contact:

Bud Dingus, Plant Manager; 810-789-1222; bdingus@fortistar.com

EGLE, AQD contact:

Dan McGeen, inspector; 517-648-7547; mcgeend@michigan.gov

Facility description:

This facility is a scrap tire processor, which shreds scrap tires.

Emission units:

Emission Unit*	Emission Unit Description	Michigan Air Pollution Control (MAPC) Rule	Compliance Status
Raptor Manufacturing/Jomar tire shredder	2021-installed tire shredder with water spray system	285(2)(I)(iv)(B)	Compliance
Columbus-McKinnon tire shredder	1992-installed tire shredder with water spray system	285(2)(I)(iv)(B)	Compliance; not operating
Sandblaster	Self-contained sandblaster	285(2)(I)(iv)(B)	Compliance; not operating

***An *emission unit* is any part of a stationary source that emits or has the potential to emit an air contaminant.**

Regulatory overview:

This facility is considered a true minor source. A *major source* has the potential to emit (PTE) of 100 tons per year (TPY) or more, of one of the criteria pollutants. Criteria pollutants are those for which a National Ambient Air Quality Standard exists, and include carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds, lead, particulate matter smaller than 10 microns, and particulate matter smaller than 2.5 microns.

This facility is considered a minor or *area source* for Hazardous Air Pollutants (HAPs), because it is not considered to have a PTE of 10 TPY or more for a single HAP, nor to have a PTE of 25 TPY or more for combined HAPs.

The facility has no air permit also known as a permit to install (PTI). The processes they operate are considered to be exempt from the requirement of Michigan Air Pollution Control (MAPC) Rule 201 to obtain a PTI under the following MAPC exemption rules:

MAPC Rule 285(2)(l)(vi)(B), which exempts:

(l) The following equipment and any exhaust system or collector exclusively serving the equipment: (vi) Equipment for carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paper board, wood, wood products, stone, glass, fiberglass, or fabric which meets any of the following:

(A) Equipment used on a nonproduction basis.

(B) *Equipment that has emissions that are released only into the general in-plant environment. (Emphasis added.)*

(C) Equipment that has externally vented emissions controlled by an appropriately designed and operated fabric filter collector that, for all specified operations with metal, is preceded by a mechanical precleaner.

Fee status:

This facility is not considered fee-subject, as it is not a major source for criteria air pollutants or for HAPs, nor is it subject to a federal New Source Performance Standard or a Maximum Achievable Control technology standard.

This facility is not required to submit an annual air emissions report. Criteria for those facilities which must report on an annual basis are identified in the operational procedure AQD-013: Criteria Pollutant Threshold Levels for the Point Source Emissions Inventory.

Location:

- Address: 6515 N. Dort Highway, Flint, 48505, Genesee County
- Description: The facility sits across Dort Hwy. from a motel and from a trailer park. To the north is a vacant lot and to the south is an auto salvage business. To the west is a railyard.

Most recent inspection:

4/27/2006: Compliance.

Recent complaints:

The only complaints on record for this facility predate the Michigan Air Compliance Enforcement System (MACES) database, which dates back to 2007.

Violations:

None on record from AQD.

Operating schedule:

Monday-Friday, 8:00 AM-5:00 PM.

Safety apparel required:

Safety glasses are required within close proximity to the shredders while in operation. A safety vest is not required but is recommended outside of the building. An office check in and I.D. are required to be on the grounds.

Odor evaluation:

- Start of evaluation: 9:35 AM.
- Weather conditions: Overcast, 65 degrees F, and humid, with wind out of east at 0-5 miles per hour (mph).
- Odors detected: None.
- Route taken: Driving north N. Dort Highway, past the facility. AQD staff then did other field work before visiting the site.

Arrival:

This was an unannounced inspection. The AQD was represented by Dan McGeen,

inspector. Arrival time: 10:21 AM.

- Weather conditions: Overcast, 65 degrees F, and humid from recent rain, with wind out of east or northeast at 5 mph.
- Odors detected: None.
- Visible emissions detected: None.

D. McGeen met with Plant Manager Bud Dingus and explained the reason for the visit.

Inspection:

The facility processes 6,000-8,000 tires per year, B. Dingus explained, which is about 60,000-90,000 tires per month. Tire clean up season is in spring and fall. Each year, 25% of their throughput is clean up tires, with 75% being from "live" tires. The City of Flint has a tire buyback program, where they pay citizens \$1.00 for each tire brought in. The city then pays Environmental Rubber Recycling to take the tires.

2021-installed tire shredder with water spray; MAPC Rule 285(20)(I)(vi)(B):

The new Raptor Manufacturing/Jomar unit is located inside the main plant. It does not exhaust to the outside air. It was operating, and no visible emissions were observed, aside from a water mist. There was a generous amount of water being applied from a hose and 6 sprayers.

D. McGeen took 2 photos (attached) of the new tire shredder, described below:

1. IMG_0678.JPG, conveyor belt from underneath 2021-installed tire shredder, showing water and collected particulate.
2. IMG_0679.JPG; new shredder operating.

1992-installed tire shredder with water spray; MAPC Rule 285(20)(l)(vi)(B):

The 1992-installed Columbus-McKinnon unit is located inside the main plant. It was not operating today. It is slower and more maintenance intensive than the new unit, but they really like it, so it is kept for back up.

D. McGeen took one photo of the original tire shredder, described below:

1. IMG_0680.JPG; original 1992-installed shredder, not running on 7/13/2022. It is kept as backup.

Miscellaneous:

They have a tire shear, which uses a blade to cut scrap tires. It did not appear to generate any particulate emissions. They also have a tire rim crusher, which the AQD did not observe operate.

Some of the site's roadways have concrete pavement, while some are unpaved. B. Dingus explained that they apply calcium chloride to site roadways to control dust. They have a water mister or sprayer on a light pole which is mounted on a swing arm.

Fugitive dust was not observed during the inspection.

Departure:

- Time of departure: 12:08 PM.
- Weather conditions: Overcast and 66 degrees F, with wind out of west at 5 mph.
- Odors detected: None.
- Visible emission detected: None.

Conclusion:

There were no instances of noncompliance, and no areas of concern. Facility housekeeping was very good.



Image 1(1) : Underside of conveyor of 2021-installed tire shredder, showing water and collected particulate.



Image 2(2) : New 2021 tire shredder is at center, and original 1992 unit is at far right.



Image 3(3) : Original, 1992-installed tire shredder, used for backup.

NAME David R. [Signature]

DATE 6/19/2024

SUPERVISOR RB