



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

May 10, 2022

VIA E-MAIL

Jeff Shoemaker, President
Shoemaker Services, Incorporated
380 South Fenway Drive
Fenton, Michigan 48430

SRN: U252200787, Genesee County

Dear Jeff Shoemaker:

VIOLATION NOTICE

On March 2, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Shoemaker Services, Inc. (Shoemaker Services) located at 380 S. Fenway Drive, Fenton, Michigan. The purpose of this inspection was to determine Shoemaker Services' 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 to investigate a recent complaint which we received on February 7, 2022, regarding fallout of shredded wood fibers attributed to Shoemaker Services' operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Wood shredding process	Rule 901(b)	Fallout of wood fibers were confirmed on off-site property, downwind.

Prior to arrival at the site, AQD staff collected two samples of particulate matter from City of Fenton property, which was located to the northeast of the Shoemaker Services site. The first sample consisted of particulate matter found on leaves and was collected approximately 300 feet east of the Shoemaker Services site. Per our discussion by phone on April 26, 2022, photographs were taken of the area where the first sample was collected and will be forwarded to you by email. The second sample also consisted of particulate matter, found on leaves, on the northeast bank of the drain between the Shoemaker Services site and the City of Fenton property. Photographs were not taken of the second sample location, however.

Jeff Shoemaker
Shoemaker Services, Inc.
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Occasionally, isolated fine particulates could be seen in the air, near the drain, while the wood shredding process could be heard operating.

The particulate samples were submitted to EGLE's contract lab, Merit Laboratories, Inc. A copy of the lab report, received on March 28, 2022, is attached to this letter. It states, in part:

"Stereomicroscopy and Polarized Light Microscopy (PLM) showed that these two samples both contain ragged fiber clusters of various sizes, which are attached to (stuck to) leaves. These fiber clusters match sawdust and have the optical characteristics of wood (90%). Microchemical analysis on the yellow to brownish colored, fibrous clusters from both samples were positive for lignan, a significant component of wood. There were significant numbers of fibers on the leaves of both samples. Neither sample had particles that respond to a magnet."

In the professional judgment of AQD staff, the fallout which was detected off of the Shoemaker Services site constitutes a violation of Rule 901(b) of the administrative rules promulgated under Act 451. Rule 901 of the administrative rules reads as follows:

"Rule 901. Notwithstanding the provisions of any other rule, a person shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:

- (a) Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.
- (b) Unreasonable interference with the comfortable enjoyment of life and property."

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 31, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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, P.O. Box 30242, First Floor South, Lansing, Michigan 48909 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Shoemaker Services 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.

Jeff Shoemaker
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Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of Shoemaker Services. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in black ink, appearing to read 'Daniel A. McGeen', written in a cursive style.

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

Enclosure

cc: Mike Johnson, City of Fenton
Jason Payne, City of Fenton
Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Jenine Camilleri, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE



Analytical Laboratory Report

Report ID: S33887.01(01)
Generated on 03/28/2022

Report to

Attention: Daniel McGeen
EGLE, Air Quality Division
525 West Allegan Street
P.O. Box 30242, 1st Fl. South
Lansing, MI 48909

Phone: 517-648-7547 FAX:
Email: mcgeend@michigan.gov

Report produced by

Merit Laboratories, Inc.
2680 East Lansing Drive
East Lansing, MI 48823

Phone: (517) 332-0167 FAX: (517) 332-6333

Contacts for report questions:
John Lavery (johnlavery@meritlabs.com)
Barbara Ball (bball@meritlabs.com)

Report Summary

Lab Sample ID(s): S33887.01-S33887.02
Project: Shoemaker Fallout Invest.
Collected Date(s): 03/02/2022
Submitted Date/Time: 03/16/2022 10:05
Sampled by: Daniel A. McGeen
P.O. #: 30242

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Maya Murshak
Technical Director



Analytical Laboratory Report

General Report Notes

Analytical results relate only to the samples tested, in the condition received by the laboratory.

Methods may be modified for improved performance.

Results reported on a dry weight basis where applicable.

'Not detected' indicates that parameter was not found at a level equal to or greater than the reporting limit (RL).

When MDL results are provided, then 'Not detected' indicates that parameter was not found at a level equal to or greater than the MDL.

40 CFR Part 136 Table II Required Containers, Preservation Techniques and Holding Times for the Clean Water Act specify that samples for acrolein and acrylonitrile need to be preserved at a pH in the range of 4 to 5 or if not preserved, analyzed within 3 days of sampling.

QA/QC corresponding to this analytical report is a separate document with the same Merit ID reference and is available upon request.

Full accreditation certificates are available upon request. Starred (*) analytes are not NELAP accredited.

Samples are held by the lab for 30 days from the final report date unless a written request to hold longer is provided by the client.

Report shall not be reproduced except in full, without the written approval of Merit Laboratories, Inc.

Limits for drinking water samples, are listed as the MCL Limits (Maximum Contaminant Level Concentrations)

PFAS requirement: Section 9.3.8 of U.S. EPA Method 537.1 states "If the method analyte(s) found in the Field Sample is present in the

FRB at a concentration greater than 1/3 the MRL, then all samples collected with that FRB are invalid and must be recollected and reanalyzed."

Samples submitted without an accompanying FRB may not be acceptable for compliance purposes.

Wisconsin PFAs analysis: MDL = LOD; RL = LOQ. LOD and LOQ are adjusted for dilution.

Report Narrative

There is no additional narrative for this analytical report



Analytical Laboratory Report

Laboratory Certifications

Authority	Certification ID
Michigan DEQ	#9956
DOD ELAP/ISO 17025	#69699
WBENC	#2005110032
Ohio VAP	#CL0002
Indiana DOH	#C-MI-07
New York NELAC	#11814
North Carolina DENR	#680
North Carolina DOH	#26702
Alaska CSLAP	#17-001
Pennsylvania DEP	#68-05884
Wisconsin DNR	FID# 399147320

Qualifier Descriptions

Qualifier	Description
!	Result is outside of stated limit criteria
B	Compound also found in associated method blank
E	Concentration exceeds calibration range
F	Analysis run outside of holding time
G	Estimated result due to extraction run outside of holding time
H	Sample submitted and run outside of holding time
I	Matrix interference with internal standard
J	Estimated value less than reporting limit, but greater than MDL
L	Elevated reporting limit due to low sample amount
M	Result reported to MDL not RDL
O	Analysis performed by outside laboratory. See attached report.
R	Preliminary result
S	Surrogate recovery outside of control limits
T	No correction for total solids
X	Elevated reporting limit due to matrix interference
Y	Elevated reporting limit due to high target concentration
b	Value detected less than reporting limit, but greater than MDL
e	Reported value estimated due to interference
j	Analyte also found in associated method blank
p	Benzo(b)Fluoranthene and Benzo(k)Fluoranthene integrated as one peak.
x	Preserved from bulk sample

Glossary of Abbreviations

Abbreviation	Description
RL/RDL	Reporting Limit
MDL	Method Detection Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
SW	EPA SW 846 (Soil and Wastewater) Methods
E	EPA Methods
SM	Standard Methods
LN	Linear
BR	Branched



Analytical Laboratory Report

Sample Summary (2 samples)

Sample ID	Sample Tag	Matrix	Collected Date/Time
S33887.01	001	Solid	03/02/22 09:42
S33887.02	002	Solid	03/02/22 09:50



Analytical Laboratory Report

Lab Sample ID: S33887.01

Sample Tag: 001

Collected Date/Time: 03/02/2022 09:42

Matrix: Solid

COC Reference:

Sample Containers

#	Type	Preservative(s)	Refrigerated?	Arrival Temp. (C)	Thermometer #
1	Petri Dish	None	No	RT	IR

Other / Misc.

Method: , Run Date: 03/25/22 17:00, Analyst: MGG

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags
Misc. Special Project*	Completed				1		1

1-See Summary of Results.



Analytical Laboratory Report

Lab Sample ID: S33887.02

Sample Tag: 002

Collected Date/Time: 03/02/2022 09:50

Matrix: Solid

COC Reference:

Sample Containers

#	Type	Preservative(s)	Refrigerated?	Arrival Temp. (C)	Thermometer #
1	Petri Dish	None	No	RT	IR

Other / Misc.

Method: , Run Date: 03/25/22 17:00, Analyst: MGG

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags
Misc. Special Project*	Completed				1		1

1-See Summary of Results.

Merit Laboratories Login Checklist

Lab Set ID:S33887

Client:MDEQ AIR (MI Dept. of Environment, Great Lakes, and Energy)

Project: Shoemaker Fallout Invest.

Submitted:03/16/2022 10:05 Login User: MMC

Attention: Daniel McGeen

Address: EGLE, Air Quality Division
525 West Allegan Street
P.O. Box 30242, 1st Fl. South
Lansing, MI 48909

Phone: 517-648-7547 FAX:

Email: mcgeend@michigan.gov

Selection	Description	Note
Sample Receiving		
01.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Samples are received at 4C +/- 2C Thermometer # RT
02.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Received on ice/ cooling process begun
03.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Samples shipped USPS
04.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Samples left in 24 hr. drop box
05.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Are there custody seals/tape or is the drop box locked
Chain of Custody		
06.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	COC adequately filled out
07.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	COC signed and relinquished to the lab
08.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Sample tag on bottles match COC
09.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Subcontracting needed? Subcontracted to:
Preservation		
10.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Do sample have correct chemical preservation
11.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Completed pH checks on preserved samples? (no VOAs)
12.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Did any samples need to be preserved in the lab?
Bottle Conditions		
13.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	All bottles intact
14.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Appropriate analytical bottles are used
15.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Merit bottles used
16.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Sufficient sample volume received
17.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Samples require laboratory filtration
18.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Samples submitted within holding time
19.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Do water VOC or TOX bottles contain headspace

Corrective action for all exceptions is to call the client and to notify the project manager.

Client Review By: _____ Date: _____



2680 East Lansing Dr., East Lansing, MI 48823
 Phone (517) 332-0167 Fax (517) 332-4034
 www.meritlabs.com

C.O.C. PAGE # 1 OF 1

REPORT TO **CHAIN OF CUSTODY RECORD** **INVOICE TO**

CONTACT NAME Daniel A. McGeen
 COMPANY EGLE, Air Quality Division
 ADDRESS 525 W. Allegan, Lansing Dist. Office, 1st Floor S.
 CITY Lansing STATE MI ZIP CODE 48909
 PHONE NO. 517-648-7547 FAX NO. 517-241-3571 P.O. NO. 30242
 E-MAIL ADDRESS mcgeend@michigan.gov QUOTE NO.

CONTACT NAME Amy Robinson, QA coordinator SAME
 COMPANY EGLE, Air Quality Division
 ADDRESS 525 W. Allegan, 2 South, P.O. Box 30260
 CITY Lansing STATE MI ZIP CODE 48909
 PHONE NO. E-MAIL ADDRESS robinsona1@michigan.gov

PROJECT NO./NAME Shoemaker fallout invest. SAMPLER(S) - PLEASE PRINT/SIGN NAME Daniela McGeen
 TURNAROUND TIME REQUIRED 1 DAY 2 DAYS 3 DAYS STANDARD OTHER
 DELIVERABLES REQUIRED STD LEVEL II LEVEL III LEVEL IV EDD OTHER

MATRIX CODE: GW=GROUNDWATER WW=WASTEWATER S=SOIL L=LIQUID SD=SOLID
 SL=SLUDGE DW=DRINKING WATER O=OIL WP=WIFE A=AIR W=WASTE

MERIT LAB NO. <small>FOR LAB USE ONLY</small>	YEAR		SAMPLE TAG IDENTIFICATION-DESCRIPTION	MATRIX	# OF BOTTLES	NONE	HCl	HNO ₃	H ₂ SO ₄	NaOH	MeOH	OTHER	# Containers & Preservatives
	DATE	TIME											
33087.01	3/2/2022	9:42 AM	001	SD	1	X							
.02	3/2/2022	9:50 AM	002	SD	1	X							

Microscope

Certifications
 OHIO VAP Drinking Water
 DoD NPDES
 Project Locations
 Detroit New York
 Other Fenton, MI
 Special Instructions

Samples include suspected wood fibers, which were stuck to fallen leaves.

RELINQUISHED BY: Daniela McGeen Sampler
 SIGNATURE/ORGANIZATION [Signature] EGLE, AQAD DATE/TIME 3/8/2022 3:50 PM
 RECEIVED BY: _____ DATE/TIME _____
 SIGNATURE/ORGANIZATION _____
 RECEIVED BY: _____ DATE/TIME _____
 SIGNATURE/ORGANIZATION _____

RELINQUISHED BY: USPS DATE/TIME 3/16/22 1005
 SIGNATURE/ORGANIZATION [Signature]
 RECEIVED BY: M. Nichols DATE/TIME 3/16/22 1005
 SIGNATURE/ORGANIZATION _____
 SEAL NO. SEAL INTACT INITIALS NOTES: TEMP. ON ARRIVAL
 YES NO
 SEAL NO. SEAL INTACT INITIALS
 YES NO RT



MERIT LABORATORIES, INC.

2680 EAST LANSING DRIVE
PHONE: 517-332-0167
FULL SERVICE ANALYTICAL TESTING

EAST LANSING • MICHIGAN • 48823
FAX: 517-332-6333
FIELD SERVICES • CONSULTING • TRAINING

Summary of Results

For

Merit No.: S33887.01 Tag: 001

Merit No.: S33887.02 Tag: 002

Conclusion

Stereomicroscopy and Polarized Light Microscopy (PLM) showed that these two samples both contain ragged fiber clusters of various sizes, which are attached to (stuck to) leaves. These fiber clusters match sawdust and have the optical characteristics of wood (90%). Microchemical analysis on the yellow to brownish colored, fibrous clusters from both samples was positive for lignan, a significant component of wood. There were significant numbers of fibers on the leaves of both samples. Neither sample had particles that respond to a magnet.

Discussion

The wood particles are clusters of fibers which match the optical properties of mechanically ground wood, some few, particles had rows of “bordered pits” and “Maltese crosses”. The particles from both samples turned ruby, red with phloroglucinol followed by concentrated HCl. This is a positive test for lignin, a significant component of wood. No response to a magnet was observed.