

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

U61230467668823

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| FACILITY: Ginman Tire | | SRN / ID: U612304676 |
| LOCATION: 665 West Clay Avenue, Muskegon | | DISTRICT: Grand Rapids |
| CITY: Muskegon | | COUNTY: MUSKEGON |
| CONTACT: Rob Ginman , Owner | | ACTIVITY DATE: 07/27/2023 |
| STAFF: Scott Evans | COMPLIANCE STATUS: Compliance | SOURCE CLASS: |
| SUBJECT: On-site inspection to further investigate previous complaint and assess compliance with air quality rules and regulations. | | |
| RESOLVED COMPLAINTS: | | |

Introduction

On July 27, 2023, State of Michigan Department of Environment, Great Lakes, and Energy Air Quality Division (AQD) staff member Scott Evans (SE) conducted an on-site inspection of the Ginman Tire facility located at 665 West Clay Ave., in Muskegon, Michigan. This inspection was in response to an odor complaint investigation on July 18, 2023, that identified tire retreading as a process conducted at the facility alongside other tire repair processes. An inspection was conducted to ensure proper compliance with air quality rules and regulations.

Inspection

Upon arrival at the facility, SE conducted a perimeter observation of the facility, during which no odors or visible emissions (VEs) were identified. Upon entering the facility, SE was greeted by staff members Julia Hunter, Jeremy Ginman, and Rob Ginman. A discussion of the purpose of the visit was followed by an inspection of the facility. The process of tire retreading was explained while relevant equipment was shown.

To start the process, used tires are shaved down to remove existing tread. This process is conducted in an enclosed building and produces rubber shavings, which are collected by a hood system and directly entered into a closed trailer that is then hauled to a different business and facility once the trailer is full. This process is exempt from air quality permitting requirements under Rule 285(2)(l)(vi).

The shaved tires are then coated with a small application of adhesive to secure the new treads. Some solvents and cleaners may be used for cleanup before or after to ensure proper adherence of the treads to the tire without any excess or spots of poor tire integrity. The adhesives, solvents, and cleaners are the only source of Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOCs) at the facility. A review of the toxicity of these substances found that none had a health-based screening level below 0.04 $\mu\text{g}/\text{m}^3$ and that a combined potential emission rate of all HAPs from all sources did not exceed 100 lbs/year. As the facility only uses approximately 500 lbs of all substances combined throughout a calendar year, the potential emissions of VOCs are well below 5 tpy. It appears that the process is exempt from air permitting under Rule 291(2). The facility was instructed to maintain this information regarding the use of these materials and that a new assessment must be completed if any changes to the process or materials are made.

The final stage in the tire retreading process is the heating of tires in a large oven to cure adhesives and cement the new treads on the tires. It is believed that the opening of this oven after heating a batch of tires is what was the original source of the odor complaints that brought the AQD to the facility. This oven is vacuum sealed while in operation and does not exceed 300°F during operation so there is no exhaust created during operation. Hot air containing odors is released to the in-plant

environment when the oven is opened, though no visible emissions are released. This was discussed with the company who agreed to be conscientious about when doors are opened regarding how long to let heat dissipate, whether the large bay doors are open, and at what time of day to minimize disruptions to neighbors. At this time no violation will be issued and if problems persist the discussion will be reopened. This oven is an electric oven and is not subject to air permitting requirements. The facility expressed that during their busiest periods they retread roughly 30 tires daily, though it is often less than that.

Conclusion

At the conclusion of this inspection the facility appeared to be compliant with all applicable air quality rules and regulations. The facility has been instructed to maintain records to demonstrate compliance with exemption requirements.

NAME Scott EvansDATE 8/30/2023SUPERVISOR  _____