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

B473468991

FACILITY: SHRADER TIRE & OIL CO		SRN / ID: B4734
LOCATION: 25445 OUTER DR, MELVINDALE		DISTRICT: Detroit
CITY: MELVINDALE		COUNTY: WAYNE
CONTACT: Bob Watters , General Manager - Manufacturing & MDC Distribution		ACTIVITY DATE: 08/24/2023
STAFF: Gerald Krawiec	COMPLIANCE STATUS: <del>Non</del> Compliance	SOURCE CLASS: MINOR
SUBJECT: FY2023		
RESOLVED COMPLAINTS:		

**On-site Inspection August 24, 2023.**

AQD staff conducted an On-site Inspection for FY 2023 of Shrader Tire & Oil Company located at 25445 Outer Drive in the City of Melvindale. The purpose of the inspection is to determine the facility's compliance with applicable state and federal air pollution rules and regulations in addition to AQD Permits No. 125-06A and No. 198-19. General Manager, Bob Watters accompanied staff during this inspection.

**FACILITY BACKGROUND:**

Shrader Tire & Oil is a fleet servicing facility specializing in commercial tire repair, retreads, and lubricants. The facility is located North of Southfield Road, West of I-75, East of Dix/Toledo Road, and South of Schaefer Highway. On a 9.12-acre parcel of land.

Shrader Tire & Oil retreads and repairs used truck tires and distributes various automotive fluids, including oils and diesel exhaust fluid (DEF). The facility also performs rim reconditioning and is a tire wholesaler. The facility has operated at this location since 2006. The tire retread is a franchise of Michelin Retread Technologies which is operated by Shrader Tire & Oil is using Michelin's equipment and materials. The Shrader Tire & Oil Company headquarters are located in Toledo, Ohio.

**OPERATING SCHEDULE:**

Hours of operation are 5:00 AM – 1:30 PM, Monday through Friday, for the tire retread and 7:00 AM – 7:00 PM, Monday through Friday, for fluid distribution. There are approximately 45 employees at this facility: 25 in the retread operation.

**COMPLIANCE HISTORY:**

The most recent inspection of the facility was May 13, 2019, which resulted in the issuance of a Violation Notice (VN) issued on September 12, 2019. Violation of PTI No. 126-06A Special Conditions 1.6, 1.12a and R 336.1201 for failure to obtain a PTI for a burn-off oven. In addition, AQD requested that Shrader 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 PTI for those tanks. All issues listed in the VN have been resolved.

**PROCESS DESCRIPTION:**

The processes have not changed since the last inspection on May 13, 2019.

**INSPECTION NARRATIVE:**

Bob Watters accompanied AQD staff on a tour of the facility.

Regarding PTI No. 126-16A, Special Conditions: FGTireRetreading Section, consists of EUTireBuffing, EUTireRepair, EUTireBuilding, and EUTireCuring. Bob pointed out the corrective action taken to comply with 1.6 and 1.12a in the VN. The material handling system for the EUTireBuffing is installed and operated; the vents on the side of the trailer have been removed and emissions no longer bypass the stack.

Regarding the Fluid Distribution area, as requested, Shrader performed 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 PTI for those tanks. On October 28, 2019, Trinity Consultants concluded that the tank farm is exempt from permitting per Rule 284(2)(c) and also Rule 284(2)(l).

Regarding the Rims, reconditioning is performed by first placing the rims in a burn-off oven at 800°F for 5 hours to remove dried paint from the rim. The rims are then placed into a shot blast machine for removal of any paint or rust; there are two shot blast machines, and each can hold two rims at a time. Each shot blast machine has its own baghouse and drop out box and each exhaust out the side of the building. The rims may also be manually powder coated, based on customer specifications. The powder coat booth exhausts within the building and is equipped with filters both inside and outside the booth, which are replaced on a regular basis. Any powder coated rims are cured in an electric oven for 11.5 minutes at 400°F.

Regarding the R 336.1201 cited in the VN. Schrader was issued General PTI No. 198-19 on December 18, 2019. EU-BURNOFF is a batch type natural gas-fired burn-off oven with a secondary chamber or afterburner, used to remove paints, oil, or grease from metal parts by thermal decomposition in a primary chamber. At this time, the temperature in the secondary chamber is 1400°F. Some temperature records (pie charts) were reviewed. The shot blast booths are exempt per Rule 285(2)(l)(vi)(C) and the powder coating booth and electric oven are exempt per Rule 287(2)(d).

**COMPLIANCE DETERMINATION:**

Based this on-site inspection of Shrader Tire and Oil. It appears this facility is in substantial compliance with both AQD's PTI No. 126-06A and PTI No. 198-19 and any other applicable air quality rules and regulations.

NAME



DATE

6/3/24

SUPERVISOR

