



SHRADER TIRE AND OIL, INC.
2045 Sylvania Ave., Toledo, OH 43613
(419) 472-2128 • Fax (419) 471-2534
www.shradertireandoil.com



October 9, 2019

Mr. Jonathan Lamb
Senior Environmental Quality Analyst
Air Quality Division
State of Michigan
Department of Environment, Great Lakes, and Energy
3058 W. Grand Boulevard, Suite 2-300
Detroit, Michigan 48202-6058

Dear Mr. Lamb:

Shrader Tire & Oil, Inc. is in receipt of a Violation Notice dated September 12, 2019 from EGLE citing a violation of Special Condition Nos. 1.6 and 1.12a of Permit to Install (PTI) No. 126-06A due to the use of a material collection trailer exhausted through filtered side vents rather than the permitted exhaust stack. The Violation Notice also cited the Bake Off Oven installation as a violation of Rule R 336.1201 – failure to obtain a PTI prior to installation.

In addition to these cited violations, the Notice requests Shrader to perform stack testing to verify compliance with the PM emission limit of 0.1 lb PM per 1,000 lb of exhaust gases emitted from Tire Buffing and the PM10 emission limit of 1.8 lb/hr from Tire Buffing. Finally, the Violation Notice requests Shrader to confirm and document the exempt status of the storage tanks in the Bulk Plant.

To address the cited violations and information requests, Shrader is doing the following:

- No longer using filtered side vent trailers. Shrader is investigating the possibility of permitting the use of filtered side vent trailers and will submit a PTI application if Shrader decides to pursue this option.
- Contracting with an environmental consulting firm to assist with the remaining Violation Notice tasks:
 - o Obtaining a PTI, or general permit, for the Burn Off Oven;
 - o Performing the requested PM and PM10 testing on the Tire Buffing exhaust stack; and
 - o Documenting the exempt status of the tanks in the Bulk Plant.
- Shrader expects to have a consultant under contract before the end of October and the Violation Notice tasks completed on the following schedule:
 - o Provide Bulk Plant tank exemption documentation by the end of October;
 - o Submit a PTI or general permit application for the Bake Off Oven by the end of November;

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o Perform PM and PM10 stack testing by the end of January. This date allows adequate time to contract with a qualified testing company and schedule test and alternate dates (due to the potential for winter weather delays) including the remaining requirements of Rules R 336.2001(2) through (5).

Best Regards,

Bob Watters
General Manager
Manufacturing & MDC
Distribution

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