

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb

Governor

Brian C. Rockensuess

Commissioner

June 21, 2024

## **VIA E-MAIL**

Rodney Rodgers Pyrolyx d.b.a. Preferred Tire Recycling 575 S 10th Street Hillsdale, Indiana, 47854 mattf@preferredtirerecycling.com

Re: Violation/Inspection Summary Letter 083-P-00758/083-S-00759/083-T-00760

Dear Mr. Rodgers:

On June 18, 2024, representatives of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Pyrolyx d.b.a. Preferred Tire Recycling, located at 575 S 10th Street, Hillsdale, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection: Routine

Results of Inspection: Violations were observed (see attached inspection report).

Within 30 days of receipt of this letter, a written detailed explanation, documenting compliance with each required action listed in the inspection report, must be submitted to this office. Please direct any response to this letter and any questions to Molly Matzen at (317) 601-5377 or <a href="MMatzen@idem.IN.gov">MMatzen@idem.IN.gov</a>. Thank you for your attention to this matter.

Sincerely.

Mary Ann EuDaly, Chief

**Industrial Waste Compliance Section** 

Daniel Walterman

Compliance Branch
Office of Land Quality

Enclosure

cc: Vermillion County Health Department







## Waste Tire Processor, Storage, and Transporter Inspection Report INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Inspector's Name:	Molly Matzen
Others In Attendance:	Hunter Pace
Time In:	10:20 AM
Time Out:	11:00 AM
Date of Inspection:	6/18/2024
Purpose of Inspection:	Quarterly

General Information								
Facility Contact Information								
1. Facility Name	Pyrolyx dba Preferred Tire Recycling							
2. Facility Location	575 South 10 Hillsdale, Indi Vermillion Co	ana 47854						
3. Facility Mailing Information	575 South 10Th Street Hillsdale, Indiana 47854 Vermillion County							
Facility Contact Information	Phone Numb	Facility Contact: Alex Prichard Phone Number: (765) 245-2190 Email: mattf@preferredtirerecycling.com						
5. Owner's Contact Information	Owner: Rodney Rodgers Phone Number: (217) 918-0868 Email: rodneyr@preferredtirerecycling.com							
ID/Permit/License								
Processor Registration Number:		083-P-00758		Expiration Date:	12/5/2024			
Storage Registration Number:		083-S-00759		Expiration Date:	12/5/2024			
Transporter Registration Number:		083-T-00760		Expiration Date:	11/27/2024			
BMV Salvage Motor Vehicle Business License ID Number:				Expiration Date:				
Storm Water Permit Number:								
Drinking Water PWSID Number:								
Other Permit:								
Supplemental Inspection Infor	mation:							
1. Photos:								
2. Samples:		☐ Yes    No						
3. Pollution Prevention Ops:		☐ Yes    No						
4. Maps (See Attached):	C Yes • No							
General Facility Information								
A1. For storage facilities, what is the site?	e number of w		28,000					

\$68,910				
Bond				
Bond				
N/A				
Baled sidewalls for traffic services; Tires are also modified and taken to Terre Haute landfill; Tires are also processed into crumb rubber for reuse				

# Waste Tire Material Volume Inventory

## Outside

Description	Width (ft)	Length (ft)	Height (ft)	CYDS	Tons	Factor	PTE
Waste passenger tire pile	23	3	4	10.2		10 PTE/CYD	102
Waste passenger tire pile	12	21	3	28		10 PTE/CYD	280
Waste passenger tire pile	25	43	3	119.4		10 PTE/CYD	1,194
23 bags of crumb rubber						1500 lbs./ 20 lbs. per PTE	1,725
33 bags of crumb rubber						1700 lbs./ 20 lbs. per PTE	2,805
23 bags of crumb rubber						1800 lbs./ 20 lbs. per PTE	2,070
7 waste semi tires, hand counted						5 PTE/semi	35
						Total:	8,211

## Inside

Description	Width (ft)	Length (ft)	Height (ft)	CYDS	Tons	Factor	PTE
Waste Semi Tires	21	22	7	119.8		3 PTE/CYD; 5 PTE/semi	1,797
257 Waste Semi Tires, Hand counted						5 PTE/semi	1,285
Waste Passenger Tires	27	16	6.5	104		10 PTE/CYD	1,040

						Total:	4,122	
Total: 12,333								

## **Summary**

## Pre-Inspection Information

Pyrolyx Tire Recycling d.b.a. Preferred Tire Recycling, is a waste tire processor, transporter and storage facility located at 575 S 10th Street, Hillsdale, Indiana. The facility's processor and storage permit expire on December 5, 2024. The facility's transporter permit expires on November 27, 2024. On February 26, 2024, a storage modification was approved to increase the facility's storage limit from 20,000 PTE to 28,000 PTE (VFC # 83602516)

#### Inspection

On June 18, 2024, a quarterly waste tire inspection was conducted at Pyrolyx d.b.a. Preferred Tire Recycling. IDEM staff arrived on-site and met with facility representative, Alex Prichard, in the office. The inspection began with a file review. IDEM staff observed the daily PTE inventory record and manifests. IDEM staff observed the facility using the appropriate registration numbers. No issues were noted with the paperwork.

The inspection continued as IDEM staff were guided to the processing building. IDEM staff measured a waste semi tire pile. IDEM staff hand counted approximately 257 waste semi tires (*see photo log- photo 1*). IDEM staff measured a waste passenger tire pile (*photo 2*).

The inspection continued outside to the west side of the property. IDEM staff measured a waste passenger tire pile containing approximately seven waste semi tires. South of the previous pile, IDEM staff measured a waste passenger tire pile (*photo 3*). On the southwest corner of the facility, IDEM staff measured a waste passenger tire pile (*photo 4*). IDEM staff noted an oil spill under the tire de-rimmer and addressed it with Mr. Prichard (*photo 5*). Contaminated soil from oil spills may be removed by digging at least six inches below and disposing of the contaminated dirt in a dumpster for disposal at a landfill. Mr. Prichard informed IDEM staff it would be remediated as soon as possible.

The inspection continued as IDEM staff was guided to the northwest side of the property to count 23 bags of crumb rubber (photo 6). Mr. Prichard informed IDEM staff they weighed approximately 1,500 lbs. each. IDEM staff hand-counted approximately 33 bags of crumb rubber on the northeast side of the property (photo 7). Mr. Prichard informed IDEM staff they weighed approximately 1,700 lbs. each. IDEM staff hand counted approximately 23 additional bags of crumb rubber (photo 8). Mr. Prichard informed IDEM staff they weighed approximately 1,800 lbs. each.

Pyrolyx d.b.a. Preferred Tire Recycling had approximately 12,333 passenger tire equivalents (PTEs) on site. Please be reminded that bagged crumb rubber is counted towards the total PTE count on site. See Waste Tire Material Volume Inventory above for calculations.

IDEM staff were shown an easily accessible fire extinguisher and a first aid kit. The inspection concluded with an exit interview.

#### Conclusion

At the time of the June 18, 2024 inspection, the facility had 12,333 PTEs onsite. This is below the 28,000-PTE limit in the facility's tire storage permit. Violations were cited regarding an unaddressed fluid release. Please be reminded the facility's registrations expire in 2024 and to submit paperwork in the appropriate timeframe if you are planning to further operate.

## **Description of Violations and Further Actions**

## FLUIDS MANAGEMENT

#### **18: ADDITIONAL CITATIONS**

## CITATION(S):

#### IC 13-30-2-1 (1), (3), & (5): Specific acts prohibited

Sec. 1. A person may not do any of the following:

- (1) Discharge, emit, cause, allow, or threaten to discharge, emit, cause, or allow any contaminant or waste, including any noxious odor, either alone or in combination with contaminants from other sources, into: (A) the environment; or (B) any publicly owned treatment works; in any form that causes or would cause pollution that violates or would violate rules, standards, or discharge or emission requirements adopted by the appropriate board under the environmental management laws
- (3) Deposit any contaminants upon the land in a place and manner that creates or would create a pollution hazard that violates or would violate a rule adopted by one (1) of the boards.
- (5) Dump or cause or allow the open dumping of garbage or of any other solid waste in violation of rules adopted by the solid waste management board

#### 329 IAC 10-4-2: Acts prohibited

Sec. 2. No person shall cause or allow the storage, containment, processing, or disposal of solid waste in a manner which creates a threat to human health or the environment, including the creating of a fire hazard, vector attraction, air or water pollution, or other contamination.

#### 329 IAC 10-4-3: Open dumps prohibited

Sec. 3. Open dumping and open dumps, as those terms are defined in IC 13-11-2-146 and IC 13-11-2-147, are prohibited.

#### 329 IAC 10-4-4 (a): Owner responsibilities

Sec. 4. (a) The owner of real estate upon which an open dump is located is responsible for the following: (1) Correcting and controlling any nuisance conditions that occur as a result of the open dump. Correction and control of nuisance conditions must include: (A) removal of all solid waste from the area of the open dump and disposal of such wastes in a solid waste land disposal facility permitted to accept the waste. (2) Eliminating any threat to human health or the environment.

## 329 IAC 13-4-3(e)(3): Used oil storage

Sec. 3. Upon detection of a release of used oil to the environment not subject to the requirements of 40 CFR 280 Subpart F, which has occurred after the effective date of this rule, a generator must perform the following clean-up steps: (3) Clean up and manage properly the released used oil and other materials

Note (6-18-24): IDEM staff observed an unaddressed oil spill under the tire de-rimmer.

REQUIRED ACTIONS: Immediately clean-up, remove, and contain all spills and contaminated soil/debris resulting from spills and releases. Remove at least six (6) inches below visible contamination. Dispose of all waste and contaminated soil/debris in a state permitted municipal solid waste landfill. Within thirty (30) days of receipt of this letter, submit a written response to IDEM, documenting proper disposal of the remediated waste as well as plans to prevent future contamination.

## Photo Log



## Photo 1

Facility Name: Pyrolyx dba Preferred Tire

Recycling

Photographer: Molly Matzen

Date: June 18, 2024

Others Present: Alex Prichard (Facility), Hunter

Pace (IDEM)

Location & Description: Pile of waste semi tires

inside processing building.



#### Photo 2

Facility Name: Pyrolyx dba Preferred Tire

Recycling

Photographer: Molly Matzen

Date: June 18, 2024

Others Present: Alex Prichard (Facility), Hunter

Pace (IDEM)

Location & Description: Pile of waste passenger tires in processing building.



## Photo 3

Facility Name: Pyrolyx dba Preferred Tire

Recycling

Photographer: Molly Matzen

Date: June 18, 2024

Others Present: Alex Prichard (Facility), Hunter

Pace (IDEM)

Location & Description: Waste passenger tire

pile.



## Photo 4

Facility Name: Pyrolyx dba Preferred Tire

Recycling

Photographer: Molly Matzen

Date: June 18, 2024

Others Present: Alex Prichard (Facility), Hunter

Pace (IDEM)

Location & Description: Waste passenger tire

pile.



## Photo 5

Facility Name: Pyrolyx dba Preferred Tire

Recycling

Photographer: Molly Matzen

Date: June 18, 2024

Others Present: Alex Prichard (Facility), Hunter

Pace (IDEM)

Location & Description: Fluid release under tire

de-rimmer.



## Photo 6

Facility Name: Pyrolyx dba Preferred Tire

Recycling

Photographer: Molly Matzen

Date: June 18, 2024

Others Present: Alex Prichard (Facility), Hunter

Pace (IDEM)

Location & Description: Bagged crumb rubber.



## Photo 7

Facility Name: Pyrolyx dba Preferred Tire

Recycling

Photographer: Molly Matzen

Date: June 18, 2024

Others Present: Alex Prichard (Facility), Hunter

Pace (IDEM)

Location & Description: Bagged crumb rubber.



## Photo 8

Facility Name: Pyrolyx dba Preferred Tire

Recycling

Photographer: Molly Matzen

Date: June 18, 2024

Others Present: Alex Prichard (Facility), Hunter

Pace (IDEM)

Location & Description: Bagged crumb rubber.

From: Matt Finnestead

To: <u>Martin, Bradley A</u>; <u>Matzen, Molly</u>

Cc: <u>kim.hawkins</u>; <u>Hummel, Lindsey</u>; <u>Wade Rogers</u>; <u>Rodney Rogers</u>

**Subject:** Re: Pyrolyx dba Preferred Tire Recycling - Industrial Waste Inspection Report

**Date:** Wednesday, June 26, 2024 4:57:05 PM

Attachments: IDEM - Response to Violation Inspection Summary Letter (2024-06-25).pdf

ptr signature adj.png

image001.png image003.png image004.png image005.png image006.png image007.png

83 - IW - Pyrolyx dba Preferred Tire Recycling - 083-P-00758 - 083-S-00759 - 083-T-00760 - 6-18-24.pdf

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

Good Afternoon Brad / Molly,

We are in receipt of this inspection report, and have addressed the issue that was raised.

Please review the attached response and kindly advise upon any further concerns.

Thank you / Best Regards,

Matt Finnestead
Vice President of Finance & Administration

Pyrolyx Tire Recycling, LLC (dba Preferred Tire Recycling)
Pyrolyx Transportation, LLC
Preferred Tire Recycling of St. Louis, LLC



Preferred Tire Recycling 575 S. 10th Street Hillsdale, IN 47854 Phone: (765) 245-2190

ext. 704

mattf@preferredtirerecycling.com https://www.preferredtirerecycling.com

On Jun 21, 2024, at 7:31 AM, Martin, Bradley A <BAMartin@idem.IN.gov>wrote:

Attached is the Industrial Waste Inspection Report for Pyrolyx dba Preferred Tire Recycling. Please respond to this email to confirm your receipt of this document.



#### Brad Martin

Administrative Assistant | Compliance Branch Office of Land Quality Indiana Department of Environmental Management

(317) 234 6923 | <u>Bamartin@idem.IN.gov</u>

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