

# Air Enforcement: Tennessee Air Pollution Control Board Order/Assessment of Civil Penalty to Clinton, Tennessee Tire Manufacturing Facility



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The Tennessee Air Pollution Control Board issued a March 16th Technical Secretary's Order and Assessment of Civil Penalty ("Order") to the Carlstar Group LLC ("Carlstar Group") for an alleged air violation. Case No. APC17-0005.

Carlstar operates a rubber tire manufacturing facility in Clinton, Tennessee.

The Carlstar facility is stated to hold a Clean Air Act Major Source operating permit ("Title V"). The Title V permit imposes certain air monitoring requirements on the facility. This includes a requirement to continuously monitor referenced baghouses with a triboelectric monitor, and archive five-minute averages on the computer network as a historical data record.

Tennessee Division of Air Pollution Control personnel are stated to have reviewed the Carlstar facility's semi-annual report for the period of April 1, 2016 through September 30, 2016 and the annual compliance certification for the period of October 1, 2015 through September 30, 2016. The facility's semi-annual report and annual compliance certification are stated to have indicated that due to a change in data systems between June 24, 2016 and July 20, 2016, 11.3% of the historical data from Mixer #1 Baghouse, 11.2% of the historical data from Mixer #2 Baghouse, and 11.2% of the historical data from the Pre-Weigh Baghouse had not been stored.

The facility was issued a Notice of Violation for the alleged violation.

Carlstar is stated to have responded that its Environmental Manager will review the baghouse leak detection system data more frequently to detect and limit data losses. Further, the company stated it created an e-mail system that would alert the EHS Manager, Maintenance Manager, Lead Maintenance, Shift Maintenance and IT personnel of any upset conditions where the system is not communicating data values, at which time a panel alarm would sound, which would have to be reset manually.

The Order assess a civil penalty of \$1,500.

[A copy of the Order can be downloaded here.](#)