

New York State Department of Environmental Conservation
Facility DEC ID: 9146400030



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 9-1464-00030/00199
Mod 0 Effective Date: 07/20/1999 Expiration Date: 07/20/2004
Mod 1 Effective Date: 01/26/2001 Expiration Date: 07/20/2004
Mod 2 Effective Date: 03/29/2004 Expiration Date: 07/20/2004

Permit Issued To: GOODYEAR DUNLOP TIRES NORTH AMERICA LTD
1144 EAST MARKET ST
AKRON, OH 44316-0001

Contact: DAVID A WOODRING
GOODYEAR TIRE AND RUBBER COMPANY
1144 EAST MARKET ST., D/110F
AKRON, OH 44316-0001
(330) 796-0565

Facility: GOODYEAR DUNLOP TIRES NORTH AMERICA LTD
10 SHERIDAN DRIVE
TONAWANDA, NY 14150

Contact: MARK R CRAFT
GOODYEAR DUNLOP TIRES NA LTD
PO BOX 1109
BUFFALO, NY 14240-1109
(716) 879-8497

Description:
GDTNA operates a tire manufacturing plant in Tonawanda, New York, located in Erie County. The facility has approximately 1.9 million square feet of manufacturing and warehousing on 130+ acres of land. There are approximately 1450 employees at this location, currently producing approximately 14,000 tires per day. These tires consist of a combination of truck, motorcycle, and automotive tires. The plant has historically run 355 days per year.

Organo-silane coupling agents will be added to additional amount of rubber mixed in the banbury mixers over the amount mixed reported in Mod 1. The purpose of the organo-silane coupling agent is to bond the rubbers, silicas, and carbon black and assist in cross-linking for vulcanization of the tire. Ethanol is evolved during the reaction of silica, rubber, and other compounds in the rubber mixture. In order to avoid NSR applicability and additional RACT controls, GDTNA Tonawanda will implement a facility-wide ethanol cap of thirty-nine(39) tons per year from the use of organo-silane coupling agents. By implementing a facility-wide cap it is not necessary to utilize a cap emissions for either the mixing(EU02)



New York State Department of Environmental Conservation
Facility DEC ID: 9146400030

or curing(EU05) areas. The facility wide cap of 39 tons per year ethanol will be less than the RACT toleration level of one hundred and sixty five (165) tons per year.

In order to document compliance with 6NYCRR part 212.10 RACT the facility will track and calculate monthly ethanol emissions from EU 02 Materials Handling and Mixing and EU05 Tire Building and Curing. Cumulatively, total ethanol emissions will be tracked on a twelve(12) month rolling average basis.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: DAVID S DENK
 DIVISION OF ENVIRONMENTAL PERMITS
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2999

Authorized Signature: _____ Date: ___ / ___ / _____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees, and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Applications for Permit Renewals and Modifications

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions and Revocations by the Department

Permit Modifications, Suspensions, and Revocations by the Department

Permit Modifications, Suspensions, and Revocations by the Department

Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION 9

HEADQUARTERS

Submission of Applications for Permit Modification or Renewal -REGION 9

HEADQUARTERS



DEC GENERAL CONDITIONS

****** General Provisions ******

For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 1-1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1-1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1-1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1-1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or



New York State Department of Environmental Conservation
Facility DEC ID: 9146400030

rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 1-3: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301.2(m)

Item 1-3.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 2-1: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13

Item 2-1.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 2-1.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 2-1.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 3: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13(a)

Expired by Mod No: 2

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Condition 1-4: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13(a)

Expired by Mod No: 2

Item 1-4.1:



New York State Department of Environmental Conservation
Facility DEC ID: 9146400030

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 1-4.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Condition 2-2: Permit Modifications, Suspensions and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 2-2.1:

The Department reserves the right to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

Condition 1-5: Permit Modifications, Suspensions, and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Expired by Mod No: 2

Item 1-5.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.

Condition 4: Permit Modifications, Suspensions, and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Expired by Mod No: 2

Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:



New York State Department of Environmental Conservation
Facility DEC ID: 9146400030

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.

Condition 1-2: Permit Modifications, Suspensions, and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Expired by Mod No: 2

Item 1-2.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

- a) the scope of the permitted activity described in the application is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.

****** Facility Level ******

Condition 1-6: Submission of Applications for Permit Modification or Renewal -REGION 9 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 1-6.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2999
(716) 851-7165

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 9 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits

New York State Department of Environmental Conservation
Facility DEC ID: 9146400030



270 Michigan Avenue
Buffalo, NY 14203-2999
(716) 851-7165



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: GOODYEAR DUNLOP TIRES NORTH AMERICA LTD
1144 EAST MARKET ST
AKRON, OH 44316-0001

Facility: GOODYEAR DUNLOP TIRES NORTH AMERICA LTD
10 SHERIDAN DRIVE
TONAWANDA, NY 14150

Authorized Activity By Standard Industrial Classification Code:
3011 - TIRES AND INNER TUBES

Mod 0 Permit Effective Date: 07/20/1999

Permit Expiration Date: 07/20/2004

Mod 1 Permit Effective Date: 01/26/2001

Permit Expiration Date: 07/20/2004

Mod 2 Permit Effective Date: 03/29/2004

Permit Expiration Date: 07/20/2004



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 200.3: False statement
- 27 6NYCRR 201-6: Emission Unit Definition
- 2-3 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
- 2-4 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 2-5 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
- 2-1 6NYCRR 201-6.5(e): Reporting Requirements
- 2-2 6NYCRR 201-6.5(e): Compliance Certification
- 29 6NYCRR 202-2.1: Compliance Certification
- 30 6NYCRR 202-2.5: Recordkeeping requirements
- 33 6NYCRR 227-2.3: Facility Permissible Emissions
- *34 6NYCRR 227-2.3: Compliance Certification
- 2-6 6NYCRR 231-2.2: Facility Permissible Emissions
- *2-7 6NYCRR 231-2.2: Compliance Certification
- 35 6NYCRR 231-2.12: Compliance Certification
- 36 6NYCRR 231-2.13: Compliance Certification
- 2-8 40CFR 68: Accidental release provisions.

Emission Unit Level

- 37 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 38 6NYCRR 201-6: Process Definition By Emission Unit
- 39 6NYCRR 227-2.3: Emission Unit Permissible Emissions

EU=0-0EU01

- 40 6NYCRR 227-1.3: Compliance Certification

EU=0-0EU01,Proc=002

- 41 6NYCRR 225-1.8: Compliance Certification

EU=0-0EU02

- 1-8 6NYCRR 212.4(c): Compliance Certification
- 42 6NYCRR 212.6: Compliance Certification

EU=0-0EU03

- 43 6NYCRR 212.6: Compliance Certification

EU=0-0EU03,Proc=004,ES=0ES17

- 44 40CFR 60.542(a)(3), NSPS Subpart BBB: Compliance Certification
- 45 40CFR 60.543(d), NSPS Subpart BBB: Compliance Certification

EU=0-0EU04

- 46 6NYCRR 212.6: Compliance Certification

EU=0-0EU05

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



- 47 6NYCRR 212.6: Compliance Certification
- 48 40CFR 60.542(a)(5)(i), NSPS Subpart BBB: Compliance Certification
- 49 40CFR 60.543(b)(4), NSPS Subpart BBB: Compliance Certification
- 50 40CFR 60.546(f), NSPS Subpart BBB: Compliance Certification
- 51 40CFR 60.546(j), NSPS Subpart BBB: Compliance Certification

EU=0-0EU06

- 1-9 6NYCRR 212.4(c): Compliance Certification
- 52 6NYCRR 212.6: Compliance Certification

EU=0-0EU06,Proc=015

- 53 6NYCRR 212.3(b): Compliance Certification
- 54 6NYCRR 212.4: Compliance Certification

EU=0-0EU07

- 55 6NYCRR 212.6: Compliance Certification

EU=0-0EU08

- 56 6NYCRR 212.6: Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 2-9 ECL 19-0301: Contaminant List
- 2-10 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 58 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

EU=0-0EU01,Proc=002

- 61 6NYCRR 225-1.2(a)(2): Compliance Demonstration
- 62 6NYCRR 227-1.2(a)(2): Compliance Demonstration

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

Item A: Sealing - 6NYCRR Part 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6NYCRR Part 200.6

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Item C: Maintenance of Equipment - 6NYCRR Part 200.7

Any person who owns or operates an air contamination

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Item D: Unpermitted Emission Sources - 6NYCRR Part 201-1.2

If an existing emission source was subject to the permitting requirements of 6NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 6NYCRR Part 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item F: Recycling and Salvage - 6NYCRR Part 201-1.7

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Item G: Prohibition of Reintroduction of Collected Contaminants to the Air - 6NYCRR Part 201-1.8

No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Item H: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 201-1.10(b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item I: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR Part 201-3.2(a)

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



requirements, regulations, or law.

- Item J: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR Part 201-3.3(a)**
The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.
- Item K: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)**
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.
- Item L: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)**
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- Item M: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- Item N: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission**

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



Requirements - 6 NYCRR Part 201-6.5(a)(3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item O: Providing Information Upon Request - 6 NYCRR Part 201-6.5(a)(4)

The permittee shall furnish to the Department, within a reasonable time, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The permittee shall also, on request, furnish the Department with copies of records required to be kept by the permit. Where information is claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

Item P: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR Part 201-6.5(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item Q: Property Rights - 6 NYCRR Part 201-6.5(a)(6)

This permit does not convey any property rights of any sort or any exclusive privilege.

Item R: Fees - 6 NYCRR Part 201-6.5(a)(7)

The owner and/or operator of a stationary source shall pay fees to the department consistent with the fee schedule authorized by 6 NYCRR Subpart 482-2.

Item S: Right to Inspect - 6 NYCRR Part 201-6.5(a)(8)

Upon presentation of credentials and other documents, as may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:

- i. Enter upon the permittee's premises where the permitted

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



facility is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

iii. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Item T: Severability - 6 NYCRR Part 201-6.5(a)(9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item U: Progress Reports and Compliance Schedules - 6 NYCRR Part 201-6.5(d)(5)

Progress reports consistent with an applicable schedule of compliance must be submitted at least semiannually on a calendar year basis, or at a more frequent period if specified in the applicable requirement or by the Department elsewhere in this permit. These reports shall be submitted to the Department within 30 days after the end of a reporting period. Such progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

ii. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Item V: Off Permit Changes - 6 NYCRR Part 201-6.5(f)(6)

No permit revision will be required for operating changes that contravene an express permit term, provided that such

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the Administrator and the Department with written notification in advance of the proposed changes within a minimum of 7 days as required by 6 NYCRR §201-6.5(f)(6).

Item W: Permit Shield - 6 NYCRR Part 201-6.5(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item X: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



a shorter time period in the case of an emergency.

Item Y: Required Emission Tests - 6 NYCRR Part 202-1.1

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6NYCRR Part 202-1.

Item Z: Visible Emissions Limited - 6 NYCRR Part 211.3

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Item AA: Open Fires - 6 NYCRR Part 215

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, rubbish for salvage, or rubbish generated by industrial or commercial activities.

Item BB: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item CC: Federally Enforceable Requirements - 40 CFR 70.6(b)

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS

The following conditions are subject to annual compliance certification requirements for Title V permits only.

Condition 1: False statement
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 200.3

Item 1.1:

No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

Condition 27: Emission Unit Definition
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 201-6

Item 27.1(From Mod 0):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-0EU01

Emission Unit Description:

STEAM IS PRODUCED BY A COMBINATION OF FIVE (5) BOILERS THAT ARE FIRED BY EITHER NATURAL GAS (P001) OR #6 FUEL OIL (P002). BOILERS NUMBER ONE (1) AND TWO (2) EXHAUST THROUGH EMISSION POINT 00001. THESE BUILT-UP BOILERS, MANUFACTURED BY BABCOCK & WILCOX, ARE RATED AT 59.00 MMBTU/HR EACH. BOILERS NUMBER FIVE (5) AND SIX (6) EXHAUST THROUGH EMISSION POINT 00003. THESE BUILT-UP BOILERS, MANUFACTURED BY BABCOCK & WILCOX, ARE RATED AT 60.00 MMBTU/HR EACH. BOILER NUMBER SEVEN (7) EXHAUSTS THROUGH EMISSION POINT 0 0004. THIS PACKAGE BOILER,

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



MANUFACTURED BY CLEAVER BROOKS, IS RATED AT
29.30 MMBTU/HR.

Building(s): 22

Item 27.2(From Mod 1):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-0EU02

Emission Unit Description:

Following is a description of minor permit changes at this emission unit permitted under the title V modification number 1.

Banbury No. 6 is changing from a four wing to a six wing rotor. This change may increase the rubber production capacity of this banbury mixer by as much as 15%. The facility output is limited by the number of available tire presses to process rubber produced in the banbury mixers and therefore this change should not be considered "debottlenecking". Potential increase in VOC emissions due to this change is 5 tons per year, most of which will be due to export of additional mixed rubber to other Goodyear plants.

Organo-silane coupling agents will be added to some of the rubber mixed in the banbury mixers. The purpose of the organo-silane coupling agent is to bond the rubbers, silicas, and carbon black and assist in cross-linking for vulcanization of the tire. Ethanol is evolved during the reaction of silica, rubber and other compounds in the rubber mixture. The rate of ethanol evolution is dependent on several factors, including the concentrations of silica and organo-silane in the mixture, the mixing temperature, the processing time, and the moisture content of the silica. There are no current plans to apply coupling agents to all rubber mixed at the plant. Additional VOC emissions from adding the coupling agent to the mix has been less than 5 tons per year. Emissions of Ethanol are generated by percentage, 25% at mixers and 75% at the press.

The two changes above have not increased emissions above the 6NYCRR part 212-10 requirement for "RACT" at the mixers or presses. Emissions are still less than 3 pounds per hour at each of these emission sources. Reference 10/7/94 Dunlop RACT plan and 10/20/00 minor permit mod. application attachments.

Also added is a refiner/warm up mill ventilation system



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

.(emission source ES15- emission point 01-55) and a change in the control/ventilation system at the # 9 banbury. The refiner/warmup mill was previously not vented to atmosphere and was included as a fugitive emission. A vent will be installed and identified as emission point 01-55. The # 9 banbury powder dump stations will each vent to a separate control system prior to manifolding to a common stack. Both sources are subject to the existing monitoring conditions in the title V permit under 6 NYCRR 212.6

Building(s): 01

Item 27.3(From Mod 1):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-0EU03

Emission Unit Description:

Modification #1 includes the installation of a vent, for employee comfort, over the "gum line" at the calandering area. The emissions were previously accounted for as fugitive emissions and amount to approximately 300 pounds per year. This is identified as process- P009, ES26, EP-02-19.

Building(s): 02
04
08

Item 27.4(From Mod 0):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-0EU04

Emission Unit Description:

THE CALENDERING PROCESS IS USED TO BOND A CONTINUOUS TEXTILE OR NUMEROUS STEEL WIRES TO ONE (1) OR TWO (2) LAYERS OF RUBBER FOR USE IN THE TIRE BUILDING PROCESS. THE CONTINUOUS TEXTILE PRODUCT, OR THE NUMEROUS STEEL WIRES, PASS THROUGH A SERIES OF ROLLERS WHICH ONE (1) OR TWO (2) RUBBER STRIPS ALSO PASS THROUGH. UNDER PRESSURE AND ELEVATED TEMPERATURES INDUCED BY THE ROLLERS, THE RUBBER IS BONDED TO THE TEXTILE PRODUCT OR STEEL WIRES. THE NIP OF THE ROLLERS CAN BE ADJUSTED TO VARY THE THICKNESS OF THE CAL ENDERED PRODUCT. THE RUBBERIZED FABRIC/STEEL WIRES ARE THEN COOLED AND CUT TO THE PROPER DIMENSION.

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



Building(s): 02
04

Item 27.5(From Mod 1):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-0EU05

Emission Unit Description:

With the permit modification # , a new south O/E Green Tire Spray Booth will be installed and identified as emission point 14-07, emission source ES32. The applicable regulations are the same as those for the existing booths listed in the original title V permit.

Building(s): 10
11
14

Item 27.6(From Mod 1):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-0EU06

Emission Unit Description:

Included in this emission unit, by the permit modification #1, is a new tire repair station for ATV tires (Emission Point 10-07) and a new tire repair station for O/E tires (Emission Point 14-08). The tire repair stations will be subject to the same particulate and opacity standards as the rest of the sources identified in this emission unit.

Building(s): 08
10
12
13
14A

Item 27.7(From Mod 0):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-0EU07

Emission Unit Description:

TIRES ARE TESTED FOR QA/QC PURPOSES. THIS INVOLVES CUTTING UP SAMPLES OF TIRES FOR ANALYTICAL TESTING AND INSPECTION.

Building(s): 06
10

Item 27.8(From Mod 0):



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-0EU08

Emission Unit Description:

RUBBER PLY (SYNTHETIC FABRIC I.E. NYLON, POLYESTER, ETC. COVERED ON BOTH SIDES WITH RUBBER STOCK) IS DIRECTED THROUGH A FIELD OF HIGH ENERGY RADIATION WHICH PRE-CURES THE RUBBER. THIS ELECTRON PROCESSING SYSTEM (KNOWN AS EBR UNIT) IS SIMILAR TO A MICROWAVE IN THAT THE HIGH ENERGY IS PRODUCED BY HIGH VOLTAGE DC, ACCELERATED AND DIRECTED AT THE RUBBER PLY. THIS HIGH VOLTAGE ELECTRIC ENERGY PRODUCES OZONE WHICH WILL BE EXHAUSTED BY A POWERED FAN WITHOUT ANY CONTROL EQUIPMENT. PAST EXPERIENCE AND MANUFACTURE S DATA INDICATE THAT UP TO 0.5 POUNDS OF OZONE CAN BE GENERATED PER HOUR OF OPERATION.

Building(s): 04

**Condition 2-3: Recordkeeping and reporting of compliance monitoring
Effective between the dates of 03/29/2004 and 07/20/2004**

Applicable Federal Requirement: 6NYCRR 201-6.5(c)

Item 2-3.1:

The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii) The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

**Condition 2-4: Monitoring, Related Recordkeeping, and Reporting
Requirements.
Effective between the dates of 03/29/2004 and 07/20/2004**

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



Applicable Federal Requirement: 6NYCRR 201-6.5(c)(2)

Item 2-4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 2-5: Compliance Certification

Effective between the dates of 03/29/2004 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(3)(ii)

Item 2-5.1:

The Compliance Certification activity will be performed for the Facility.

Item 2-5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



(1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 0 days after the reporting period.

The initial report is due 6/30/2004.

Subsequent reports are due every 6 calendar month(s).

Condition 2-1: Reporting Requirements

Effective between the dates of 03/29/2004 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 201-6.5(e)

Item 2-1.1:

Any reports due prior to the first calendar based certification must be submitted as previously indicated. All reports due thereafter will be submitted on a calendar basis.

Condition 2-2: Compliance Certification

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



Effective between the dates of 03/29/2004 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 201-6.5(e)

Item 2-2.1:

The Compliance Certification activity will be performed for the Facility.

Item 2-2.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;and
 - such additional requirements as may be specified elsewhere in this permit related to compliance certification.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.
- iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



Department.

iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Compliance Monitoring and Enforcement (BCME) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

270 Michigan Avenue
Buffalo, NY 14203-2999

The address for the BCME is as follows:

NYSDEC
Bureau of Compliance Monitoring
and Enforcement
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2002.
Subsequent reports are due on the same day each year

Condition 29: Compliance Certification
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 29.1:

The Compliance Certification activity will be performed for the Facility.

Item 29.2:

Compliance Certification shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year

Condition 30: Recordkeeping requirements
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 30.1:

(a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 33: Facility Permissible Emissions
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 227-2.3

Item 33.1:

The sum of emissions from the emission units specified in this permit shall not exceed the following Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 0NY210-00-0 (From Mod 2) PTE: 198,000 pounds per year
Name: OXIDES OF NITROGEN

Condition 34: Compliance Certification
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 227-2.3

Item 34.1:

The Compliance Certification activity will be performed for the Facility.



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 34.2:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

DUNLOP HAS LIMITED THEIR ANNUAL POTENTIAL TO EMIT NITROGEN OXIDES BELOW APPLICABILITY LEVELS OF SUBDIV 227-2.3. (<100 TONS/YEAR) FACILITY IS EXEMPT FROM RACT ANALYSIS AND IMPLEMENTATION RQMTS OF THIS SECTION. PERMIT CONDITIONS WERE ESTABLISHED IN A PERMIT LETTER DATED 11/29/1995.

Dunlop Tire Corp. operates 5 existing natural gas and # 6 oil fired stationary combustion installations as well as a few insignificant sources which contribute to a facility potential to exceed 100 tons per year of Nitrogen Oxide (NOx) emissions. New York State Code of Rules and Regulations part 227-2 requires that facilities with the potential to exceed 100 tons per year (tpy) of NOx emissions must install Reasonable Available Control Technology (RACT) or limit emissions below the threshold.

Dunlop has proposed to manage fuel usage and perform fuel switching to limit emissions of NOx from the facility to less than 100 tpy. This will be accomplished by monitoring fuel usage and calculating NOx emissions using emission factors to determine a rolling twelve month average. Detailed in this letter are State and Federally enforceable permit conditions for the operation of the following boilers:

Emission Point	Unit	Manufacturer	Heat Input-mmbtu/hr	start-up date
00001	A	Babcock&Wilcox	59.0	8/59
00001	B	"	"	"
00003	A	"	60.0	start-up date 8/57
00003	B	"	"	"
00004		Cleaver Brooks	29.3	start-up date 12/84



Operating Permit Conditions:

1. Track actual fuel usage on a monthly basis, by metering natural gas and #6 fuel oil used by the boilers and all other fuel burning equipment at the facility.
2. Obtain monthly statements from the fuel oil supplier as to the percent sulfur and nitrogen in the oil purchased. The nitrogen in oil test will be based on one of the following methods: ASTM D-3228-96, D4629-96, or D5291-96.
3. Calculate NOX emission based on the following AP-42 equation, except the NOx emissions from oil will be based on figure 2 of New York State's Air Guide-32.

FUEL OIL

-NO_x= 20.54+104.39xN%=lbs of NO_x/1000 gallons of oil burned
%Nitrogen determined by fuel supplier

NATURAL GAS

-NO_x=140lbs/mm cu.ft.

The acceptable reporting format is as submitted in the initial request for a cap dated 03/16/95.

4. Facility wide total emissions of NO_x shall not exceed 99 tpy as determined by summing the individual monthly emissions from the combustion of natural gas and #6 oil during any consecutive 12 month period.
5. The facility must maintain monthly NO_x emission records. Semi annual reports must be submitted to this office by the end of June and December each year.
6. All fuel use records and corresponding emission calculations shall be kept on site for a minimum of five years. This information shall be made available to the department upon request.
7. Any noncompliance with the 99 tpy NO_x emission limit shall be reported to the department within 30 days of

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



occurrence. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: NATURAL GAS
Parameter Monitored: OXIDES OF NITROGEN
Upper Permit Limit: 99 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2000.
Subsequent reports are due every 6 calendar month(s).

Condition 2-6: Facility Permissible Emissions
Effective between the dates of 03/29/2004 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 231-2.2

Item 2-6.1:

The sum of emissions from the emission units specified in this permit shall not exceed the following Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 000064-17-5 (From Mod 2) PTE: 78,000 pounds per year
Name: ETHYL ALCOHOL (ETHANOL)

Condition 2-7: Compliance Certification
Effective between the dates of 03/29/2004 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 231-2.2

Item 2-7.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 000064-17-5 ETHYL ALCOHOL (ETHANOL)

Item 2-7.2:

Compliance Certification shall include the following monitoring:

Capping: Yes
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

Monitoring Description:

Following is a "cap" for ethanol emissions at the facility level permitted under the title V modification number 2.

Organo-silane coupling agents will be added to additional amount of rubber mixed in the banbury mixers over the amount mixed reported in Mod 1. The purpose of the organo-silane coupling agent is to bond the rubbers, silicas, and carbon black and assist in cross-linking for vulcanization of the tire. Ethanol is evolved during the reaction of silica, rubber, and other compounds in the rubber mixture. Approximately four(4) moles of ethanol are evolved per mole of organo-silane coupling agent. Four moles are equivalent to 20.5 % by weight of the organo-silane coupling agent. The four mole determination has been established as the theoretical upper limit of ethanol evolution. The general assumptions for relating molar emission rate to batch drop temperature are shown below:

Drop Temperature Moles	Mixing Moles	Curing
<300-310 degrees F	1	
320-340 degrees F	2	
> 345 degrees F	3	
		1

Mixing emissions are not necessarily in proportion to curing emissions as the potential exists to export organo-silane containing rubber compounds for curing at other facilities. Likewise, curing emissions are not necessarily in proportion to mixing emissions as the potential exists to import and cure organo-silane containing rubber compounds mixed at other facilities.

In order to avoid NSR applicability and additional RACT controls, GDTNA Tonawanda will implement a facility-wide ethanol cap of thirty-nine(39) tons per year from the use of organo-silane coupling agents. By implementing a facility-wide cap it is not necessary to utilize a cap emissions for either the mixing(EU02) or curing(EU05) areas. The facility wide cap of 39 tons per year ethanol will be less than the RACT toleration level of one hundred and sixty five (165) tons per year.



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

In order to document compliance with 6NYCRR part 212.10 RACT the facility will track and calculate monthly ethanol emissions from EU 02 Materials Handling and Mixing and EU05 Tire Building and Curing. Cumulatively, total ethanol emissions will be tracked on a twelve(12) month rolling average basis.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: RAW MATERIAL
Parameter Monitored: ETHYL ALCOHOL (ETHANOL)
Upper Permit Limit: 39 tons per year
Reference Test Method: 40CFR 60 Method 25
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2004.
Subsequent reports are due every 6 calendar month(s).

Condition 35: Compliance Certification
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 231-2.12

Item 35.1:

The Compliance Certification activity will be performed for the Facility.

Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

An Emission Reduction Credits Application dated 9/12/95 documents Volatile Organic compound reductions from the shutdown of several previously permitted sources and from reductions in fugitive emissions. The Malcolm Pirnie 9/95 report contains the appropriate emission reduction quantification forms, summary of emissions for a 5-year evaluation period for each shut down emission point and an evaluation of fugitive emission reductions. Fugitive Emission reductions are certified under a 231-2.13 special condition.

Stack Emissions

01K04 - tread end cement for bias truck and passenger tires, removed from service 9/92.

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



02B05-02- undertread cement for bias truck and passenger tires, removed from service 9/92
02B05-03- undertread cement for bias truck tires, removed from service 1/92

02-03- undertread cement for Radial Light Truck Tires removed from service 4/91

12-05- bead dipping, removed from service 2/93

Table 2-6 in the report summarizes the baseline year, total solvent usage and average baseline year emissions for each source. The total emission reduction credit for the above removed sources is 105 tpy. Permitting of these sources for future use will be subject to the current regulations at the time of start-up.

The technology changes that allowed for the VOC reductions are use of an extruded thin tacky rubber liner that is placed on the under side of the tread in lieu of solvent based cement. This allowed for the elimination of VOC's associated with sources 02B05-02, 02B05-03 and 02-03. A similar technology advancement replaced the solvent in bead dipping, source 12-05. A thin tacky rubber liner is wrapped around the beads instead of dipping in solvent. Bias tire production was discontinued in September of 1992. Bias tire treads were extruded with side walls as one piece. The ends of these treads were cemented at emission point 01K04. Radial tires are not extruded with side walls and therefore a smaller area of tread end is cemented. The new tread end cementing line (Emission Unit EU03, Process 004) meet the New Source Performance Standard, Subpart BBB limit of 10 grams VOC per tire cemented each month. These technology changes are proven advancements, verifiable and permanent.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 36: Compliance Certification
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 231-2.13

Item 36.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 36.2:

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Non-stack Fugitive Emissions from Solvent Usage

Fugitive emission reduction credits are documented in the Malcolm Purine 9/95 report from sources such as label cementing, cold feed extruder, tire building and intermediate losses from storage, transfer and miscellaneous minor uses. The reductions are due to process and environmental changes. Dunlop performed a detailed evaluation of emissions in 1993 and used 1993 tire production records as a base year. It is assumed that the amount of solvent used per year is directly proportional to the amount of tires produced, an index to 1993 is used to establish emissions for years other than 1993. This is summarized in Table 3-3 of the report. The main reasons for the substantial decrease in fugitive solvent emissions from 1991 to the present are:

The installation of air conditioning in the tire building area provides the proper temperature and humidity conditions needed to keep the rubber surfaces naturally tacky and virtually eliminated the use of manually applied solvent during tire production.

Discontinuing the production of bias passenger and truck tires in September 1992. This primarily affected solvent use in the truck tire building area, since bias truck tires required more solvent than the radial tires that replaced them. This was due to the lack of advanced technology now used in the production of radial truck tires which substantially increased the inherent tackiness of the tire compounds used and has drastically reduced the use of manually applied solvent to aid in the tire building process.

Changing solvents from rubber solvent to the less volatile heptane reduced remaining solvent usage.

Baseline Fugitive emissions average = 194.2 tpy for 1989 and 1990

fugitive VOC emission limit = 142.5 tpy

Total Fugitive ERC credits = 51.7 tpy say

52 tpy

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



In order to maintain these credits the Permittee accepts a facility permit condition which will require continuous verification of plant solvent usage.

Fugitive VOC Facility Permit Conditions

1. The Permittee is limited to 142.5 tpy of fugitive VOC emissions and will track fugitive emissions to demonstrate compliance. The Permittee will submit semi annual reports which contain facility wide VOC purchase and disposal records, VOC content, documentation of the amounts used at point sources and the difference attributed to fugitive emissions. In addition, the Permittee must compute annual fugitive VOC emissions using a rolling 12-month period. The consumption records shall be based on verifiable data such as storage/transfer volume records to different stations in the plant. The Permittee shall maintain purchase orders and/or invoices of the VOC containing material to confirm the general accuracy of the records. These records shall be kept on site for a minimum of 5 years. This information shall be made available to the Department upon request.
2. Any noncompliance with the 142.5 tpy fugitive VOC emission limit shall be reported to the department within 30 days of occurrence. Noncompliance constitutes a violation and is grounds for enforcement action; for ERC certification termination; or for denial of facility permit renewal applications.
3. All submittals to the department shall be certified as to the truth, completeness, and accuracy of all information recorded and reported.
4. The above permit conditions do not preclude the Permittee from complying with all other applicable state and federal regulations.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2000.

Subsequent reports are due every 6 calendar month(s).

Condition 2-8: Accidental release provisions.



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

Effective between the dates of 03/29/2004 and 07/20/2004

Applicable Federal Requirement: 40CFR 68

Item 2-8.1:

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
 - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
 - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

USEPA Region 2
 Air Compliance Branch
 290 Broadway
 New York, NY 10007-1866
 ATTN: Accidental Release Program contact

****** Emission Unit Level ******

Condition 37: Emission Point Definition By Emission Unit
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 201-6

Item 37.1(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0EU01

Emission Point: 00001

Height (ft.): 31	Diameter (in.): 78	
NYTMN (km.): 4765.12	NYTME (km.): 180.429	Building: 22

Emission Point: 00003

Height (ft.): 31	Diameter (in.): 78	
NYTMN (km.): 4765.12	NYTME (km.): 180.429	Building: 22

Emission Point: 00004



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

Height (ft.): 103 Diameter (in.): 24
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 22

Item 37.2(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit:	0-0EU02		
Emission Point:	00125		
Height (ft.):	10	Diameter (in.):	13
			Building: 01
Emission Point:	00126		
Height (ft.):	59	Diameter (in.):	28
			Building: 01
Emission Point:	00128		
Height (ft.):	45	Diameter (in.):	42
			Building: 01
Emission Point:	00129		
Height (ft.):	47	Diameter (in.):	26
			Building: 01
Emission Point:	00132		
Height (ft.):	59	Diameter (in.):	28
			Building: 01
Emission Point:	00134		
Height (ft.):	48	Diameter (in.):	36
			Building: 01
Emission Point:	00135		
Height (ft.):	47	Diameter (in.):	26
			Building: 01
Emission Point:	00138		
Height (ft.):	59	Diameter (in.):	28
			Building: 01
Emission Point:	00140		
Height (ft.):	45	Diameter (in.):	42
			Building: 01
Emission Point:	00144		
Height (ft.):	59	Diameter (in.):	32
			Building: 01



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

Emission Point: 00146 Height (ft.): 45	Diameter (in.): 42	Building: 01
Emission Point: 00147 Height (ft.): 47	Diameter (in.): 26	Building: 01
Emission Point: 00151 Height (ft.): 59 NYTMN (km.): 4765.12	Diameter (in.): 28 NYTME (km.): 180.429	Building: 01
Emission Point: 00152 Height (ft.): 47 NYTMN (km.): 4765.12	Diameter (in.): 36 NYTME (km.): 180.429	Building: 01
Emission Point: 00153 Height (ft.): 58 NYTMN (km.): 4765.12	Diameter (in.): 11 NYTME (km.): 180.429	Building: 01
Emission Point: 00155 Height (ft.): 47	Diameter (in.): 21	Building: 01
Emission Point: 01F15 Height (ft.): 60 NYTMN (km.): 4765.12	Diameter (in.): 28 NYTME (km.): 180.429	Building: 01
Emission Point: 01H17 Height (ft.): 45 NYTMN (km.): 4765.12	Diameter (in.): 24 NYTME (km.): 180.429	Building: 01

Item 37.3(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0EU03		
Emission Point: 00213 Height (ft.): 38	Diameter (in.): 24	Building: 02
Emission Point: 00214 Height (ft.): 38	Diameter (in.): 24	Building: 02
Emission Point: 00215 Height (ft.): 38	Diameter (in.): 44	Building: 02



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

Emission Point: 00217 Height (ft.): 48	Diameter (in.): 32	Building: 02
Emission Point: 00218 Height (ft.): 48	Diameter (in.): 24	Building: 02
Emission Point: 00403 Height (ft.): 34	Diameter (in.): 18	Building: 04
Emission Point: 00404 Height (ft.): 34	Diameter (in.): 18	Building: 04
Emission Point: 00405 Height (ft.): 24	Diameter (in.): 10	Building: 04
Emission Point: 00406 Height (ft.): 35	Diameter (in.): 24	Building: 04
Emission Point: 00407 Height (ft.): 30	Diameter (in.): 10	Building: 04
Emission Point: 00808 Height (ft.): 40	Diameter (in.): 20	Building: 08
Emission Point: 00809 Height (ft.): 31	Diameter (in.): 18	Building: 08
Emission Point: 00810 Height (ft.): 40	Diameter (in.): 20	Building: 08
Emission Point: 02-19 Height (ft.): 40	Diameter (in.): 15	Building: 02

Item 37.4(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

Emission Unit: 0-0EU04

Emission Point: 00219
Height (ft.): 28

Diameter (in.): 22

Building: 02

Emission Point: 00220
Height (ft.): 22

Diameter (in.): 21

Building: 02

Emission Point: 00401
Height (ft.): 42

Diameter (in.): 12

Building: 04

Emission Point: 00402
Height (ft.): 35

Diameter (in.): 28

Building: 04

Item 37.5(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0EU05

Emission Point: 01006
Height (ft.): 38

Diameter (in.): 24

Building: 10

Emission Point: 01104
Height (ft.): 40

Diameter (in.): 24

Building: 11

Emission Point: 01105
Height (ft.): 40

Diameter (in.): 16

Building: 11

Emission Point: 01404
Height (ft.): 32

Diameter (in.): 24

Building: 14

Emission Point: 01405
Height (ft.): 30

Diameter (in.): 24

NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 14

Item 37.6(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0EU06



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

Emission Point: 00811 Height (ft.): 41	Diameter (in.): 24	Building: 08
Emission Point: 00812 Height (ft.): 14	Diameter (in.): 17	Building: 08
Emission Point: 01004 Height (ft.): 35	Diameter (in.): 24	Building: 10
Emission Point: 01007 Height (ft.): 18	Diameter (in.): 10	Building: 10
Emission Point: 01206 Height (ft.): 18	Diameter (in.): 10	Building: 12
Emission Point: 01301 Height (ft.): 30	Diameter (in.): 8	Building: 13
Emission Point: 01307 Height (ft.): 18	Diameter (in.): 10	Building: 13
Emission Point: 01310 Height (ft.): 18	Diameter (in.): 8	Building: 13
Emission Point: 01311 Height (ft.): 27	Diameter (in.): 8	Building: 13
Emission Point: 01406 Height (ft.): 30 NYTMN (km.): 4765.12	Diameter (in.): 24 NYTME (km.): 180.429	Building: 14A
Emission Point: 01407 Height (ft.): 30	Diameter (in.): 24	Building: 14
Emission Point: 01408 Height (ft.): 18	Diameter (in.): 8	Building: 14



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

Emission Point: 13S02
Height (ft.): 14 Diameter (in.): 8
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 13

Emission Point: 13S04
Height (ft.): 14 Diameter (in.): 16
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 13

Emission Point: 13S05
Height (ft.): 14 Diameter (in.): 16
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 13

Emission Point: 13S06
Height (ft.): 14 Diameter (in.): 16
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 13

Emission Point: 13S07
Height (ft.): 48 Diameter (in.): 26
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 13

Emission Point: 13S09
Height (ft.): 18 Diameter (in.): 10
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 13

Item 37.7(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0EU07

Emission Point: 00614
Height (ft.): 30 Diameter (in.): 12
Building: 06

Emission Point: 01005
Height (ft.): 19 Diameter (in.): 8
Building: 10

Item 37.8(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0EU08

Emission Point: 00410
Height (ft.): 38 Diameter (in.): 24
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 04

**Condition 38: Process Definition By Emission Unit
Effective between the dates of 07/20/1999 and 07/20/2004**

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



Applicable Federal Requirement: 6NYCRR 201-6

Item 38.1(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU01

Process: 001

Source Classification Code: 1-02-006-02

Process Description:

NATURAL GAS COMBUSTION OF BOILERS. STEAM IS PRODUCED BY A COMBINATION OF FIVE (5) BOILERS THAT ARE FIRED BY NATURAL GAS. BOILERS NUMBER (1) AND (2) EXHAUST THROUGH EMISSION POINT 00001. THESE BUILT-UP BOILERS, MANUFACTURED BY BABCOCK & WILCOX, ARE RATED AT 59.00 MMBTU/HR EACH. BOILERS NUMBER FIVE (5) AND SIX (6) EXHAUST THROUGH EMISSION POINT 00003. THESE BUILT-UP BOILERS, MANUFACTURED BY BABCOCK & WILCOX, ARE RATED AT 60.00 MMBTU/HR EACH. BOILER NUMBER SEVEN (7) EXHAUSTS THROUGH EMISSION POINT 00004. THIS PACKAGE BOILER, MANUFACTURED BY CLEAVER BROOKS, IS RATED AT 29.30 MMBTU/HR.

Emission Source/Control: 0ES01 - Combustion
Design Capacity: 59 million Btu per hour

Emission Source/Control: 0ES02 - Combustion
Design Capacity: 59 million Btu per hour

Emission Source/Control: 0ES03 - Combustion
Design Capacity: 60 million Btu per hour

Emission Source/Control: 0ES04 - Combustion
Design Capacity: 60 million Btu per hour

Emission Source/Control: 0ES05 - Combustion
Design Capacity: 29.3 million Btu per hour

Item 38.2(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU01

Process: 002

Source Classification Code: 1-02-004-02

Process Description:

#6 oil combustion in boilers. Steam is produced by a combination of 5 boilers that are fired by #6 oil. Boilers

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



1 and # 2 exhaust through E.P. # 1. These built-up boilers, manufactured by Babcock & Wilcox, are rated at 59 mmbtu/hr each. Boilers #5 and #6 exhaust through E. P. 3. These built-up boilers, manufactured by B&W are rated at 60 mmbtu/hr each. Boiler # 7 exhaust through E.P. #4. This package boiler, manufactured by Cleaver Brooks, is rated at 29.30 mmbtu/hr.

Emission Source/Control: 0ES01 - Combustion
Design Capacity: 59 million Btu per hour

Emission Source/Control: 0ES02 - Combustion
Design Capacity: 59 million Btu per hour

Emission Source/Control: 0ES03 - Combustion
Design Capacity: 60 million Btu per hour

Emission Source/Control: 0ES04 - Combustion
Design Capacity: 60 million Btu per hour

Emission Source/Control: 0ES05 - Combustion
Design Capacity: 29.3 million Btu per hour

Item 38.3(From Mod 1):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU02

Process: 003

Source Classification Code: 3-08-001-27

Process Description:

RUBBER MIXING DEPARTMENT 201. NATURAL RUBBER, SYNTHETIC RUBBER, CARBON BLACK, OILS AND PIGMENTS ARE MIXED TOGETHER IN 2,000 HORSEPOWER, HIGH SPEED, SHEAR TYPE BANBURY MIXERS. EACH BATCH PRODUCES APPROXIMATELY 475 POUNDS OF RUBBER "STOCK". THE MIXED RUBBER "STOCK" IS UTILIZED FURTHER THROUGH THE TIRE MANUFACTURING PROCESS TO EXTRUDE AND ROLL VARIOUS SHAPES AND COMPONENTS USED IN THE CONSTRUCTION OF TIRES. AFTER MIXING, THE RUBBER "STOCK" IS COATED WITH A WATER AND SOAP SOLUTION AND IS DRIED VIA FANS BLOWING AMBIENT AIR ACROSS THE RUBBER "STOCK".

Emission Source/Control: 0ES15 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0ES09 - Process

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



Item 38.4(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU03

Process: 004

Source Classification Code: 3-08-001-13

Process Description:

TREAD EXTRUDING. EXTRUSION IS OFTEN PERFORMED TO COMBINE SEVERAL TYPES OF PREVIOUSLY MIXED RUBBER COMPOUNDS. THE EXTRUDER CONSISTS OF A POWER DRIVEN SCREW WITHIN A STATIONARY CYLINDER. A DIE IS ATTACHED TO THE HEAD OF THE SCREW TO PRODUCE THE DESIRED SHAPE OR CROSS SECTION OF THE EXTRUDED RUBBER. EXTRUSION CAN BE PERFORMED WITH BOTH WARM OR COLD RUBBER FEED. THE EXTRUDER IS JACKETED TO MAINTAIN THE DESIRED OPERATING TEMPERATURES. IN THIS PROCESS THE TREAD PORTION OF THE DIFFERENT TYPES OF TIRES MANUFACTURED AT DUNLOP TIRE ARE EXTRUDED. THE EXTRUDED RUBBER TREADS ARE MARKED WITH A LETTER/NUMBER IDENTIFICATION CODE. INK IS TRANSFERRED TO THE TREAD SURFACE BY AN OFFSET PRINTER AND/OR AN INKJET PRINTER. TREADS ARE CUT TO LENGTH AND THE ENDS ARE SPRAYED WITH A STICKY CEMENT SOLUTION TO MAKE THEM TACKY FOR THE BUILDING. THESE TREADS WILL BE USED LATER IN THE TIRE BUILDING AREA.

Emission Source/Control: 0ES16 - Process

Emission Source/Control: 0ES17 - Process

Emission Source/Control: 0ES18 - Process

Item 38.5(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU03

Process: 005

Source Classification Code: 3-08-001-14

Process Description:

SIDEWALL EXTRUDING. EXTRUSION IS OFTEN PERFORMED TO COMBINE SEVERAL TYPES OF PREVIOUSLY MIXED RUBBER COMPOUNDS. THE EXTRUDER CONSISTS OF A POWER DRIVEN SCREW WITHIN A STATIONARY CYLINDER. A DIE IS ATTACHED TO THE LEAD OF THE SCREW TO



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

PRODUCE THE DESIRED SHAPE OR CROSS SECTION OF THE EXTRUDED RUBBER. EXTRUSION CAN BE PERFORMED WITH BOTH WARM OR COLD RUBBER FEED. THE EXTRUDER IS JACKETED TO MAINTAIN THE DESIRED OPERATING TEMPERATURE. IN THIS PROCESS THE SIDEWALL PORTION OF THE DIFFERENT TYPES OF TIRES MANUFACTURED AT DUNLOP TIRE ARE EXTRUDED. THESE SIDEWALLS WILL BE USED LATER IN THE TIRE BUILDING AREA.

Emission Source/Control: 0ES19 - Process

Item 38.6(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU03

Process: 006

Source Classification Code: 3-08-001-14

Process Description:

PROFILE EXTRUDING. EXTRUSION IS OFTEN PERFORMED TO COMBINE SEVERAL TYPES OF PREVIOUSLY MIXED RUBBER COMPOUNDS. THE EXTRUDER CONSISTS OF A POWER DRIVEN SCREW WITHIN A STATIONARY CYLINDER. A DIE IS ATTACHED TO THE HEAD OF THE SCREW TO PRODUCE THE DESIRED SHAPE OR CROSS SECTION OF THE EXTRUDED RUBBER. EXTRUSION CAN BE PERFORMED WITH BOTH WARM OR COLD RUBBER FEED. THE EXTRUDER IS JACKETED TO MAINTAIN THE DESIRED OPERATING TEMPERATURE. IN THIS PROCESS THE PROFILE PORTION OF THE DIFFERENT TYPES OF TIRES MANUFACTURED AT DUNLOP TIRE ARE EXTRUDED. THESE PROFILES WILL BE USED LATER IN THE TIRE BUILDING AREA.

Emission Source/Control: 0ES20 - Process

Item 38.7(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU03

Process: 007

Source Classification Code: 3-08-010-02

Process Description:

INNER LINER EXTRUDING. EXTRUSION IS OFTEN PERFORMED TO COMBINE SEVERAL TYPES OF PREVIOUSLY MIXED RUBBER COMPOUNDS. THE EXTRUDER CONSISTS OF A POWER DRIVEN SCREW



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

WITHIN A STATIONARY CYLINDER. A DIE IS ATTACHED TO THE HEAD OF THE SCREW TO PRODUCE THE DESIRED SHAPE OR CROSS SECTION OF THE EXTRUDED RUBBER. EXTRUSION CAN BE PERFORMED WITH BOTH WARM OR COLD RUBBER FEED. THE EXTRUDER IS JACKETED TO MAINTAIN THE DESIRED OPERATING TEMPERATURE. IN THIS PROCESS THE INNER LINER PORTION OF THE DIFFERENT TYPES OF TIRES MANUFACTURED AT DUNLOP TIRE ARE EXTRUDED. THESE INNER LINERS WILL BE USED LATER IN THE TIRE BUILDING AREA.

Emission Source/Control: 0ES21 - Process

Emission Source/Control: 0ES22 - Process

Item 38.8(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU03

Process: 008

Source Classification Code: 3-08-001-06

Process Description:

CEMENT ROOM DEPARTMENT 203. PAINT SPRAY FOR THE INSIDE AND OUTSIDE OF THE TIRES ARE MIXED IN 1,000 GALLON TANKS AND ARE LATER TRANSFERRED TO SMALLER PORTABLE TANKS. SOLVENT AND WATER BASED PAINT AND CEMENTS ARE DISPENSED INTO 100 - 300 GALLON PORTABLE TANKS VIA A GASOLINE STYLE DISPENSING NOZZLE.

Emission Source/Control: 0ES23 - Process

Emission Source/Control: 0ES24 - Process

Emission Source/Control: 0ES25 - Process

Item 38.9(From Mod 1):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU03

Process: P09

Source Classification Code: 3-08-001-15

Process Description:

calandering, extrusion of sticky, thin rubber underlayment aides in adhering tread to carcass of tire during construction.



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

Emission Source/Control: OES26 - Process

Item 38.10(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU04

Process: 009

Source Classification Code: 3-08-001-15

Process Description:

FABRIC CALENDERING DEPARTMENT 202. AS TIRE PLYS ARE BEING WOUND UP IN A FABRIC LINER, THE LINER IS BEING SUCKED CLEAN OF LINT AND DUST PARTICLES WHICH ARE CAPTURED BY A CYCLONE. THE FABRIC FOR MAKING TIRE PLYS IS THEN COATED WITH A THIN FILM OF RUBBER ON BOTH SIDES IN THE CALENDAR. THE HEAT AND VAPOR FROM THIS PROCESS ARE EXHAUSTED THROUGH A HOOD EXHAUST.

Emission Source/Control: 0ES26 - Control

Control Type: GRAVITY COLLECTOR

Emission Source/Control: 0ES27 - Process

Item 38.11(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU04

Process: 010

Source Classification Code: 3-08-001-31

Process Description:

STEEL CALENDERING DEPARTMENT 602. RUBBER STOCK IS WARMED UP PRIOR TO BEING FED TO A STEEL CORD CALENDERING LINE. FUMES FROM THE WARMING MILL ARE CAPTURED AND EXHAUSTED TO THE ATMOSPHERE VIA EMISSION POINT 02-19. AFTER WARMING , THE RUBBER STOCK IS CALENDERED (ROLLED BETWEEN/AROUND STEEL WIRE) TO FORM A SHEET OF RUBBER WITH WIRE EMBEDDED WITHIN IT. THE FUMES FROM THE CALENDERING PROCESS ARE CAPTURED AND EXHAUSTED TO THE ATMOSPHERE VIA EMISSION POINT 02-20.

Emission Source/Control: 0ES28 - Process

Emission Source/Control: 0ES29 - Process

Item 38.12(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



Emission Unit: 0-0EU05

Process: 011

Source Classification Code: 3-08-001-23

Process Description:

TIRE BUILDING DEPT. 208. THE INSIDE GREEN TRUCK TIRES AND MOTORCYCLE TIRES ARE SPRAYED WITH A WATER-BASED COATING. THE CONSTITUENTS OF THE COATING ARE AS FOLLOWS: 50 TO 60 PERCENT WATER, 10 TO 20 PERCENT SILICON, AND 20 TO 30 PERCENT MICA. AN ESTIMATED 5 PERCENT OF THE PRODUCT WILL BE EMITTED TO THE EMISSION POINTS DUE TO OVERSPRAY. THE RESULTING EMISSIONS WILL BE VENTED TO THE ATMOSPHERE VIA EMISSION POINT 11-04, FOR THE BIAS TRUCK TIRE SPRAY BOOTH AND 11-05 FOR THE MOTORCYCLE SPRAY BOOTH.

Emission Source/Control: 0ES30 - Process

Item 38.13(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU05

Process: 012

Source Classification Code: 3-08-001-06

Process Description:

TIRE BUILDING DEPT. 209. THE INSIDE OF GREEN ATV TIRES ARE SPRAYED WITH A WATER-BASED COATING. THE CONSTITUENTS OF THE COATING ARE AS FOLLOWS: 50 TO 60 PERCENT WATER, 10 TO 20 PERCENT SILICON, AND 20 TO 30 PERCENT MICA. AN ESTIMATED 5 PERCENT OF THE PRODUCT WILL BE EMITTED TO THE EMISSION POINT DUE TO OVERSPRAY. THE RESULTING EMISSIONS WILL BE VENTED TO THE ATMOSPHERE VIA EMISSION POINT 10-06.
1DAY/24 HR X 3000 TIRES PER DAY X 35 G/TIRE X 1 LB/454 G X 50% SOLIDS X 5% OVERSPRAY = 0.24 LB/HR SOLIDS. 340 DAY S/YR X 24 HR/DAY X 0.24 LB/HR = 1,958.4 LB/YR SOLIDS.

Emission Source/Control: 0ES31 - Process

Item 38.14(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU05

Process: 013

Source Classification Code: 3-08-001-23

Process Description:

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



TIRE BUILDING DEPT. 233. THE INSIDE OF GREEN TRUCK AND PASSENGER CAR TIRES ARE SPRAYED WITH A WATER-BASED COATING. THE CONSTITUENTS OF THE COATING ARE AS FOLLOWS: 50 TO 60 PERCENT WATER, 10 TO 20 PERCENT SILICON, AND 20 TO 30 PERCENT MICA. AN ESTIMATED 5 PERCENT OF THE PRODUCT WILL BE EMITTED TO THE EMISSION POINTS DUE TO OVERSPRAY. THE RESULTING EMISSIONS WILL BE VENTED TO THE ATMOSPHERE VIA EMISSION POINT 14-04 FOR THE LIGHT TRUCK RADIAL AND PASSENGER CAR TIRE SPRAY BOOTH AND 14-05 FOR THE ORIGINAL EQUIPMENT TIRES SPRAY BOOTH.

Emission Source/Control: 0ES32 - Process

Item 38.15(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU06

Process: 014

Source Classification Code: 3-08-005-01

Process Description:

MTR FINISHING DEPT. 614. CURED TIRES ARE SENT TO FINISHING DEPT. 614 (MTR FINISHING) WHERE THEY ARE TESTED FOR UNIFORMITY. A SMALL PERCENTAGE (APPROX. 1%) ARE DETERMINED TO BE "OUT OF SPECIFICATIONS" AND AS SUCH REQUIRE GRINDING TO REMOVE RUBBER TO BRING THEM BACK INTO THE RANGE OF ACCEPTABLE TOLERANCES FOR TIRE UNIFORMITY. OCCUPIED IN BLDG 8 AND 10.

Emission Source/Control: 0ES33 - Process

Emission Source/Control: 0ES34 - Process

Emission Source/Control: 0ES35 - Process

Item 38.16(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU06

Process: 015

Source Classification Code: 3-08-005-01

Process Description:

FINISHING DEPT. 237. CURED TIRES ARE SENT TO FINISHING DEPT. 237 WHERE THEY ARE TESTED FOR UNIFORMITY. A SMALL PERCENTAGE

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



(APPROXIMATELY 1%) ARE DETERMINED TO BE "OUT OF SPECIFICATIONS" AND AS SUCH REQUIRE GRINDING TO REMOVE RUBBER TO BRING THEM BACK INTO THE RANGE OF ACCEPTABLE TOLERANCES FOR THE UNIFORMITY. OCCUPIED IN BLDG 12,13,14.

Emission Source/Control: 0ES36 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 0ES38 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 0ES39 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 0ES41 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 0ES42 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 0ES43 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 0ES45 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 0ES46 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 0ES37 - Process

Emission Source/Control: 0ES40 - Process

Emission Source/Control: 0ES44 - Process

Emission Source/Control: 0ES47 - Process

Condition 39: Emission Unit Permissible Emissions
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 227-2.3

Item 39.1:

The sum of emissions from all regulated processes specified in this permit for the emission unit cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

Emission Unit: 0-0EU01

CAS No: 0NY210000 (From Mod 0)

Name: OXIDES OF NITROGEN

PTE(s): 22.6 pounds per hour

198,000 pounds per year

Condition 40: Compliance Certification
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 227-1.3

Item 40.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU01

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

DUNLOP WILL OPERATE BOILERS IN MANNER CONSISTENT W/GOOD OPERATING & MAINT PRACTICES, THUS ENSURING COMPLIANCE W/OPACITY LIMITATIONS. DUNLOP MAINTAINS SOP FOR BOILERS (ES01, ES02, ES03, ES04, ES05) WHICH CONTAINS PROCEDURES FOR MAINTENANCE AND ANY NECESSARY CALIBRATION ANNUALLY OR MORE FREQUENTLY, IF APPROPRIATE. IN RESPONSE TO OPACITY CONCERNS IN 1996, DUNLOP COMPLETED AN ACTION PLAN TO DIMINISH OR ELIMINATE SMOKE ASSOCIATED WITH THE USE OF #6 OIL IN THE BOILERS. ACTIONS PERFORMED ARE AS FOLLOWS:

1. INSTALLATION OF NEW ELECTRIC MOTOR DRIVEN JACK SHAFT ACTUATORS ON ALL FOUR WATER TUBE BOILERS THAT CONTROL THE AIR DAMPERS. THE ACTUATORS RECEIVE AN ELECTRONIC SIGNAL THROUGH A PCC-2000 COMPUTER SYSTEM WHICH ADVISE WHEN THE BOILER IS CALLING FOR MORE FUEL;
2. INSTALLATION OF PCC-2000 COMPUTERIZED COMBUSTION CONTROL SYSTEM TO IMPROVE BOILER EFFICIENCY AND PROVIDE OPERATORS WITH REAL TIME BOILER OPERATING

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



CONDITIONS;

3. TUNING OF BOILERS TO SLOW DOWN RATE OF RESPONSE;
4. INSTALLATION OF CONTROLS TO REACTIVATE THE CROSS-OVER PRESSURE REDUCING VALVE BETWEEN 150 PSI AND 250 PSI STEAM DISTRIBUTION LINES TO ESTABLISH A LOOP STEAM SYSTEM;
5. REPLACEMENT OF FUEL OIL GUN NOZZLES AND SCREENS;
6. INSTALLATION OF CLOSED CIRCUIT TV CAMERA TO ALLOW BOILER HOUSE SUPERVISOR AND OPERATOR TO MONITOR THE STACK'S OFF GASES FROM WITHIN THE BUILDING;
7. PREVENTATIVE MAINTENANCE OF BOILERS INCLUDING BURNERS AND BURNER CONES.

THE OPERATORS OF THE BOILERS ARE LICENSED BOILER ENGINEERS. DUNLOP ALSO EMPLOYS THE SERVICES OF A BOILER MAINTENANCE COMPANY THAT REGULARLY PERFORMS TUNE-UP PROCEDURES ON INDUSTRIAL/COMMERCIAL BOILERS. THE SERVICE COMPANY MAINTAINS CERTIFICATIONS FROM THE BOILER MANUFACTURERS AS AUTHORIZED SERVICE PROVIDERS. IN ADDITION, THE OPERATION OF THE 5 BOILERS ARE REVIEWED BY REPRESENTATIVES OF DUNLOP'S INSURANCE PROVIDER TO COMPLY WITH INSURANCE REQUIREMENTS. RECORDS OF ALL MAINTENANCE PROCEDURES WILL BE MAINTAINED AND PROVIDED TO THE DEPARTMENT UPON REQUEST.

DUNLOP SHALL NOT OPERATE THE BOILERS IN A MANNER WHICH CREATES OPACITY GREATER THAN 20 PERCENT (SIX MINUTE AVERAGE), EXCEPT FOR ONE SIX-MINUTE PERIOD PER HOUR OF NOT MORE THAN 27 PERCENT OPACITY.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: METHOD 9

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

Condition 41: Compliance Certification

Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 225-1.8

Item 41.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU01

Process: 002

Item 41.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Records of fuel quantity burned and supplier fuel sulfur analysis must be maintained for the purpose of demonstrating compliance with the limits in 6NYCRR part 225-1. Fuel Supplier monthly statements for fuel purchased and sulfur content is acceptable.

Monitoring Frequency: MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-8: Compliance Certification

Effective between the dates of 01/26/2001 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 1-8.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU02

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-8.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Dunlop will monitor control device parameters, specifically pressure drop, for selected emission points as an indicator that the emission control equipment is operating properly and meeting the degree of air cleaning required under 212.9 (b) (i.e. table 2). These pieces of

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



equipment will also be operated in accordance with good operating and maintenance practices as suggested by the manufacturer of the control equipment. Pressure differential monitoring devices are already in place on control devices within building 1. Dunlop will retrofit the existing 5 additional units with pressure differential monitoring devices within a timely manner. Observation of pressure drop to occur weekly and records of maintenance kept on site.

Selected emission points to be monitored within EU02 are 01h17, 01-25, 01-26, 01-32, 01-38, 01-44, 01-51 and 01-53. This is the same condition as stated under 212.6 in the original title V but includes 01-53. Semiannual monitoring information will be submitted as described in the Title V permit under 201-6

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2001.

Subsequent reports are due every 6 calendar month(s).

Condition 42: Compliance Certification
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 212.6

Item 42.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU02

Item 42.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

DUNLOP WILL OPERATE EMISSION UNIT EU02 SOURCES IN A MANNER CONSISTENT W/GOOD OPERATING AND MAINTENANCE PRACTICES, THUS ENSURING COMPLIANCE W/CAPACITY LIMIT OF 20% OR GREATER DURING ANY 6 CONSECUTIVE MINUTES FROM ANY PROCESS EMISSION SOURCE, EXCEPT FOR EMISSION OF UNCOMBINED WATER.
EMISSION UNIT EU02 IS COMPRISED OF BOTH

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



CONTROLLED AND UNCONTROLLED EMISSION SOURCES. FOR CONTROLLED EMISSION POINTS (01H17, 01-25, 01-26, 01-32, 01-38, 01-44 AND 01-51), DUNLOP PROPOSES THAT THE ACTIVITIES INDICATED FOR PART 212.4 COMPLIANCE WILL SERVE, IN PART, AS A COMPLIANCE DEMONSTRATION WITH RESPECT TO PART 212.6. THAT IS, DUNLOP WILL MONITOR PRESSURE DROP WEEKLY FOR THESE EMISSION POINTS AS AN INDICATOR THAT EMISSION CONTROL EQUIPMENT (I.E. DUST COLLECTION SYSTEMS) ARE OPERATING PROPERLY AND SUBSEQUENTLY WILL ENSURE COMPLIANCE WITH OPACITY STDS. THESE PIECES OF CONTROL EQUIPMENT WILL ALSO BE OPERATED IN ACCORDANCE WITH GOOD OPERATING AND MAINTENANCE PRACTICES AS SUGGESTED BY THE MANUFACTURER. PRESSURE DIFFERENTIAL MONITORING DEVICES ARE ALL READY IN PLACE ON THE CONTROL DEVICES ASSOCIATED WITH EU02. FOR UNCONTROLLED EMISSION POINTS WITH IN EU02 (01-28, 01-29, 01-34, 01-35, 01-40, 01-46, 01-47, 01-52, 01F15), THE ONLY ACTIVITY NECESSARY TO ENSURE COMPLIANCE WITH THE OPACITY STANDARDS IS PROPER OPERATION.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 43: Compliance Certification
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 212.6

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU03

Item 43.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

DUNLOP WILL OPERATE EMISSION UNIT EU03
IN A MANNER CONSISTENT W/GOOD OPERATING

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



PRACTICES, THUS ENSURING COMPLIANCE WITH OPACITY LIMIT OF 20% OR GREATER DURING ANY 6 CONSECUTIVE MINUTES FROM ANY PROCESS EMISSION SOURCE, EXCEPT FOR EMISSION OF UNCOMBINED WATER. EMISSION UNIT EU03 IS COMPRISED OF ONLY UNCONTROLLED EMISSION SOURCES. FOR THE EMISSION POINTS WITHIN EU03 (02-17,08-09, 02-18, 08-10, 08-08, 04-06, 02-13, 02-14, 02-15, 04-03, 04-04, 04-05, 04-07), PROPER OPERATION WILL ENSURE OPACITY COMPLIANCE.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 44: Compliance Certification
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 40CFR 60.542(a)(3), NSPS Subpart BBB

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU03

Process: 004

Emission Source: 0ES17

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 44.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each tread end cementing operation: Discharge into the atmosphere no more than 10 grams of VOC per tire cemented for each month.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 45: Compliance Certification
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 40CFR 60.543(d), NSPS Subpart BBB

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU03

Process: 004

Emission Source: OES17

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This section of the rule contains methods and calculations for determining compliance with the gram/tire limits specified in 60.542(a)(3), (a)(5)(i), (a)(5)(ii), (a)(7)(i), and (a)(7)(ii). Monitoring of VOC density, mass of VOC per month and total number of treads cemented per month are to be tracked to determine compliance.

The overspray waste cement solvent content collected at the spray station is analyzed for VOC once every six months. This waste cement is disposed of off site by incineration and the amount of VOC can be subtracted from the total amount of VOC released to atmosphere at this source.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 46: Compliance Certification

Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 212.6

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU04

Item 46.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

DUNLOP WILL OPERATE EMISSION UNIT EU04 SOURCES IN A MANNER CONSISTENT W/GOOD OPERATING AND MAINTENANCE PRACTICES, THUS

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



ENSURING COMPLIANCE W/OPACITY LIMIT OF 20% OR GREATER DURING ANY 6 CONSECUTIVE MINUTES FROM ANY PROCESS EMISSION SOURCE, EXCEPT FOR EMISSION OF UNCOMBINED WATER. EMISSION UNIT EU04 IS COMPRISED OF BOTH CONTROLLED AND UNCONTROLLED EMISSION SOURCES. FOR THE CONTROLLED EMISSION POINT (04-01), DUNLOP WILL INSPECT AND MAINTAIN CYCLONE WEEKLY. THIS PIECE OF EQUIPMENT WILL ALSO BE OPERATED IN ACCORDANCE WITH MANUFACTURERS SPECIFICATIONS. FOR UNCONTROLLED EMISSION POINTS WITHIN EU04 (02-19, 02-20, 04-02), PROPER OPERATION WILL ENSURE OPACITY COMPLIANCE. RECORDS OF ALL MAINTENANCE WILL BE MAINTAINED ON SITE.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 47: Compliance Certification
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 212.6

Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU05

Item 47.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

DUNLOP WILL OPERATE EMISSION UNIT EU05 IN A MANNER CONSISTENT W/GOOD OPERATING PRACTICES, THUS ENSURING COMPLIANCE WITH OPACITY LIMIT OF 20% OR GREATER DURING ANY 6 CONSECUTIVE MINUTES FORM ANY PROCESS EMISSION SOURCE, EXCEPT FOR EMISSION OF UNCOMBINED WATER. EMISSION UNIT EU05 IS COMPRISED OF ONLY UNCONTROLLED EMISSION SOURCES. FOR THE EMISSION POINTS WITHIN EU05(10-06, 11-04, 11-05, 14-04, 14-05) PROPER OPERATION WILL PREVENT OPACITY EXCEEDANCES. RECORDS

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



OF ALL MAINTENANCE WILL BE KEPT ON SITE.

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 48: Compliance Certification

Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 40CFR 60.542(a)(5)(i), NSPS Subpart BBB

Item 48.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU05

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 48.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

limit is 1.2 grams of VOC per tire sprayed with an inside
green tire spray for each month. compliance determined by
method 24 analysis of coating as specified in 40 cfr
60.543(b)(4) and 545(f)

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 49: Compliance Certification

Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 40CFR 60.543(b)(4), NSPS Subpart BBB

Item 49.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU05

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 49.2:

Compliance Certification shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

monitor voc content of spray to determine compliance with this section for voc content less than 1% by weight. Formulation data or analysis using method 24 required annually unless formulation changes in which case formulation data or method 24 analysis report due within 30 days of change.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2000.

Subsequent reports are due every 12 calendar month(s).

Condition 50: Compliance Certification
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 40CFR 60.546(f), NSPS Subpart BBB

Item 50.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU05

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 50.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

maintain epa method 24 data for voc analysis of green tire spray formulation. Must be less than 1% by weight VOC.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2000.

Subsequent reports are due every 12 calendar month(s).

Condition 51: Compliance Certification
Effective between the dates of 07/20/1999 and 07/20/2004



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

Applicable Federal Requirement: 40CFR 60.546(j), NSPS Subpart BBB

Item 51.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU05

Item 51.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each tread end cement operation and green tire spray operation (inside and outside) operation using water based sprays containing less than 1.0%, by weight, of VOC as described in 60.543(b)(1) shall furnish the administrator, within 60 days initially and annually thereafter, formulation data or method 24 results to verify the VOC content of the water based sprays in use. If the spray formulation changes before the end of the 12 month period, formulation data or method 24 results to verify the VOC content of the spray shall be reported within 30 days. 40 cfr 60.545(f) requires record maintenance of formulation data or the results of Method 24 analysis conducted to verify the VOC content of the spray.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/18/2000 for the period 07/20/1999 through 07/19/2000

Condition 1-9: Compliance Certification

Effective between the dates of 01/26/2001 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 1-9.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU06

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-9.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

All of the emission points are controlled by cyclone separation devices. Dunlop will monitor the control device operation by routinely performing visual inspections of the body of the cyclone during maintenance activities. The cyclone separation devices are emptied weekly. The associated duct work is cleaned two times per week. Inspections of the system are performed during each of these events. Additionally, the maintenance department performs a semiannual preventative maintenance procedure. Records of these events are on file and available for review. This applies to all emission points with control under this emission unit. Semi annual reports are required as detailed in 201-6 of this permit.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2001.

Subsequent reports are due every 6 calendar month(s).

Condition 52: Compliance Certification
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 212.6

Item 52.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU06

Item 52.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

DUNLOP WILL OPERATE EMISSION UNIT EU06 SOURCES IN A MANNER CONSISTENT W/GOOD OPERATING AND MAINTENANCE PRACTICES, THUS ENSURING COMPLIANCE W/OPACITY LIMIT OF 20% OR GREATER DURING ANY 6 CONSECUTIVE MINUTES FROM ANY PROCESS EMISSION SOURCE, EXCEPT FOR EMISSION OF UNCOMBINED WATER.
EMISSION UNIT EU06 IS COMPRISED OF BOTH CONTROLLED AND UNCONTROLLED EMISSION SOURCES. FOR CONTROLLED EMISSION POINTS (13S05, 13S06, 13S04, 12-06, 13-07,

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



13S09, 13-10 AND 13S06). DUNLOP PROPOSES THAT THE ACTIVITIES INDICATED FOR 212.3 AND 212.4 COMPLIANCE WILL SERVE , IN PART, AS A COMPLIANCE DEMONSTRATION WITH RESPECT TO PART 212.6. ALL OF THE EMISSION POINTS ARE CONTROLLED BY CYCLONE SEPARATION DEVICES. DUNLOP PROPOSES TO MONITOR THE CONTROL DEVICE OPERATION BY ROUTINELY PERFORMING VISUAL INSPECTIONS OF THE BODY OF THE CYCLONE DURING MAINTENANCE ACTIVITIES. THE CYCLONE SEPARATION DEVICES ARE CHECKED WEEKLY AND EMPTIED IF NECESSARY. THE ASSOCIATED DUCT WORK IS CLEANED TWO TIMES PER WEEK. INSPECTIONS ARE PERFORMED DURING EACH OF THESE EVENTS. ADDITIONALLY, THE MAINTENANCE DEPARTMENT PERFORMS SEMIANNUAL PREVENTATIVE MAINTENANCE PROCEDURE AND RECORDS MAINTAINED. FOR UNCONTROLLED EMISSION POINTS WITHIN EU06 (08-11, 08-12, 10-04, 13S07, 13-01, 13-11 AND 14-06), THE ONLY ACTIVITY NECESSARY TO ENSURE OPACITY COMPLIANCE IS FOR PROCESS OPERATORS TO CONTINUE TO OPERATE THE EMISSIONS-PRODUCING EQUIPMENT IN A PROPER MANNER, THEREBY AVOIDING ANY OPERATIONAL PROBLEMS.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 53: Compliance Certification
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 212.3(b)

Item 53.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU06
Process: 015

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 53.2:

Compliance Certification shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

ALL EMISSION PTS ARE CONTROLLED BY CYCLONE SEPARATION DEVICES. DUNLOP PROPOSES TO MONITOR CONTROL DEVICE OPERATION BY ROUTINELY PERFORMING VISUAL INSPECTION OF THE BODY OF THE CYCLONE DURING MAINTENANCE ACTIVITIES. CYCLONE SEPARATION DEVICES ARE EMPTIED WEEKLY IF NECESSARY. THE ASSOCIATED DUCT WORK IS CLEANED TWO TIMES PER WEEK. INSPECTIONS OF THE SYSTEM ARE PERFORMED DURING EACH OF THESE EVENTS. ADDITIONALLY, THE MAINTENANCE DEPARTMENT PERFORMS A SEMIANNUAL PREVENTATIVE MAINTENANCE PROCEDURE. RECORDS OF THESE PREVENTATIVE PROCEDURES ARE ON FILE IN THE MAINTENANCE DEPARTMENT AND WILL BE MADE AVAILABLE TO THE DEPARTMENT PERSONNEL UPON REQUEST. EMISSION POINTS 13S01,13S04 AND 13S05 EMIT SOLID PARTICULATE MATTER EMISSIONS. THESE EMISSIONS ARE SPECIFIED AS "B" RATED POLLUTANTS. THEREFORE THE PERMISSIBLE EMISSION RATE FOR THESE POINTS ARE 0.15 GRAINS/DSCF OF EXHAUST GAS.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 54: Compliance Certification
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 212.4

Item 54.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU06
Process: 015

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 54.2:

Compliance Certification shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

ALL EMISSION PTS ARE CONTROLLED BY CYCLONE SEPARATION DEVICES. DUNLOP PROPOSES TO MONITOR CONTROL DEVICE OPERATION BY ROUTINELY PERFORMING VISUAL INSPECTION OF THE BODY OF THE CYCLONE DURING MAINTENANCE ACTIVITIES. CYCLONE SEPARATION DEVICES ARE EMPTIED WEEKLY IF NECESSARY. THE ASSOCIATED DUCT WORK IS CLEANED TWO TIMES PER WEEK. INSPECTIONS OF THE SYSTEM IS PERFORMED DURING EACH OF THESE EVENTS. ADDITIONALLY, THE MAINTENANCE DEPARTMENT PERFORMS A SEMIANNUAL PREVENTATIVE MAINTENANCE PROCEDURE. ALL RECORDS OF MENTIONED ACTIVITIES ARE MAINTAINED ON SITE.

EMISSION POINTS 13S06, 12-06, 13-07, 13S09, AND 13-10 EMIT SOLID PARTICULATE MATTER SUBJECT TO THE 0.05 GRAINS/DSCF STANDARD.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 55: Compliance Certification
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 212.6

Item 55.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU07

Item 55.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

DUNLOP WILL OPERATE EMISSION UNIT EU07 IN A MANNER CONSISTENT W/GOOD OPERATING AND MAINTENANCE PRACTICES, THUS ENSURING COMPLIANCE W/OPACITY LIMIT OF 20% OR GREATER DURING ANY 6 CONSECUTIVE MINUTES

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



FROM ANY PROCESS EMISSION SOURCE, EXCEPT FOR EMISSION OF UNCOMBINED WATER.

EMISSION UNIT EU07 IS COMPRISED OF TWO CONTROLLED EMISSION SOURCES, CONTROLLED BY CYCLONE SEPARATION DEVICES. FOR CONTROLLED EMISSION POINTS 10-05 AND 06-14, DUNLOP PROPOSES TO MONITOR THE CONTROL DEVICES OPERATION BY ROUTINELY PERFORMING VISUAL INSPECTIONS OF THE BODY OF THE CYCLONES DURING MAINTENANCE ACTIVITIES. THE CYCLONES ARE EMPTIED WEEKLY IF NECESSARY, DUCT WORK CLEANED TWO TIMES PER WEEK AND INSPECTION OF THE SYSTEM PERFORMED DURING EACH OF THESE EVENTS. ADDITIONALLY THE MAINTENANCE DEPARTMENT PERFORMS A SEMIANNUAL PREVENTATIVE MAINTENANCE PROCEDURE. ALL RECORDS OF ACTIVITIES MAINTAINED ON SITE.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 56: Compliance Certification
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable Federal Requirement: 6NYCRR 212.6

Item 56.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU08

Item 56.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

DUNLOP WILL OPERATE EMISSION UNIT EU08 IN A MANNER CONSISTENT W/GOOD OPERATING PRACTICES, THUS ENSURING COMPLIANCE W/OPACITY LIMIT OF 20% OR GREATER DURING ANY 6 CONSECUTIVE MINUTES FROM ANY PROCESS EMISSION SOURCE, EXCEPT FOR EMISSION OF UNCOMBINED WATER. EMISSION UNIT EU08 IS COMPRISED OF A

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



SINGLE UNCONTROLLED EMISSION SOURCE. FOR EMISSION SOURCE ES50 AND ASSOCIATED EMISSION POINT 04-10, THE ONLY ACTIVITY NECESSARY TO ENSURE OPACITY COMPLIANCE IS PROPER OPERATION. THE MAGNITUDE OF EMISSIONS ARE MINIMAL AND OPACITY HAS ESSENTIALLY BEEN A NON-ISSUE FOR A SIMILAR SOURCE OPERATED AT ANOTHER DUNLOP FACILITY.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



STATE ONLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable and are not subject to annual compliance certification requirements for Title V permits.

Condition 2-9: Contaminant List
Effective between the dates of 03/29/2004 and 07/20/2004

Applicable State Requirement: ECL 19-0301

Item 2-9.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

CAS No: 000064-17-5

Name: ETHYL ALCOHOL (ETHANOL)

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 007446-09-5

Name: SULFUR DIOXIDE

CAS No: 0NY998-00-0

Name: VOC

Condition 2-10: Unavoidable noncompliance and violations

Effective between the dates of 03/29/2004 and 07/20/2004

Applicable State Requirement: 6NYCRR 201-1.4

Item 2-10.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.



New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 58: Air pollution prohibited
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable State Requirement: 6NYCRR 211.2

Item 58.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

****** Emission Unit Level ******

Condition 61: Compliance Demonstration
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable State Requirement: 6NYCRR 225-1.2(a)(2)

Item 61.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0EU01

Process: 002

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 61.2:

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

THE NO. 6 RESIDUAL FUEL OIL UTILIZED FOR BOILERS WILL BE RESTRICTED TO MAX OF 1.5% SULFUR BY WT. THIS CAN BE VERIFIED VIA DOCUMENTATION FROM DUNLOP'S FUEL SUPPLIER AND INDEPENDENT ANALYSIS OF THE FUEL STOCK. ANALYSIS PERFORMED MONTHLY AND REPORTED TO NYSDEC ON A SEMI-ANNUAL BASIS. THE FORMAT OF THE REPORT IS BASED ON A 12 MONTH ROLLING AVERAGE. THIS DOCUMENTATION IS MAINTAINED AT THE FACILITY AND IS AVAILABLE TO NYSDEC DURING ANY ON-SITE INSPECTION. THIS REQUIREMENT IS ASSOCIATED WITH EMISSION UNIT EU01. CONTAINED WITHIN EU01 ARE EMISSION SOURCES ES01, ES02, ES03, ES04, AND ES05. ES01 AND ES02 EXHAUST TO E.P.00001, ES03 AND ES04 EXHAUST TO 00003 AND ES05 EXHAUSTS TO E.P.00004.

Parameter Monitored: SULFUR

Upper Permit Limit: 1.5 percent by weight

Reference Test Method: METHOD 19

Monitoring Frequency: PER DELIVERY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2000.

Subsequent reports are due every 12 calendar month(s).

Condition 62: Compliance Demonstration
Effective between the dates of 07/20/1999 and 07/20/2004

Applicable State Requirement: 6NYCRR 227-1.2(a)(2)

Item 62.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0EU01

Process: 002

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

New York State Department of Environmental Conservation

Permit ID: 9-1464-00030/00199

Facility DEC ID: 9146400030



Item 62.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

DUNLOP PROPOSES TO UTILIZE PUBLISHED PARTICULATE EMISSION FACTOR FROM AP-42 FOR NO. 6 FUEL OIL TOGETHER WITH HEATING VALUE OF FUELS OF INTEREST TO DEMONSTRATE COMPLIANCE W/PARTICULATE EMISSION LIMITATION OF 0.2 LBS/MMBTU FOR OIL FOR BOILER 1,2,5,6. THIS IS INTENDED TO BE A WORST CASE CALCULATION, AS SHOWN BELOW. NOTE THAT A PARTICULATE LIMITATION DOES NOT EXIST WHEN COMBUSTING NATURAL GAS, WHICH IS ALSO UTILIZED AS A PRIMARY FUEL.

BOILER NOS. 1,2,5,6 - NO. 6 OIL

PARTICULATE EMISSION FACTOR:
 $9.19(S) + 3.22 \text{ LBS}/1000 \text{ GAL}$, WHERE
 $S = \text{SULFUR CONTENT, \%}$
 $9.19(1.5) + 3.22 = 17 \text{ LBS}/1000 \text{ GALLONS} =$
 $0.017 \text{ LBS}/\text{GALLON}$
 $0.017 \text{ LBS}/\text{GALLON} \times \text{GAL}/138,000 \text{ BTU} \times$
 $1,000,000 \text{ BTU}/\text{MMBTU}$
 $= 0.123 \text{ LBS PARTICULATE}/\text{MMBTU}$
REFLECTS COMPLIANCE WITH
227-1.2(A)(2)

THIS REQUIREMENT IS ASSOCIATED WITH EMISSION UNIT EU01. CONTAINED WITHIN EU01 IS EMISSION SOURCES ES01, ES02, ES03, ES04. ES01 AND ES02 EXHAUST TO 00001 AND ES03 AND ES04 EXHAUST TO 00003. ES05, BOILER NO. 7 IS NOT APPLICABLE TO THIS REQUIREMENT DUE TO THE RATED CAPACITY OF THE UNIT (<50 MMBTU/HR) A STACK TEST MAY BE REQUIRED TO DEMONSTRATE COMPLIANCE IF OPACITY EXCEEDANCES OCCUR.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: NUMBER 6 OIL

Upper Permit Limit: 0.2 pounds per million Btus

Reference Test Method: METHOD 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING

New York State Department of Environmental Conservation
Permit ID: 9-1464-00030/00199 Facility DEC ID: 9146400030



DESCRIPTION

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY