New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 9-1464-00030/00199 Modification Number: 2 **03/30/2004**

Facility Identification Data
Name: GOODYEAR DUNLOP TIRES NORTH AMERICA LTD
Address: 10 SHERIDAN DRIVE
TONAWANDA, NY 14150

Owner/Firm
Name: GOODYEAR DUNLOP TIRES NORTH AMERICA LTD
Address: 1144 EAST MARKET ST
AKRON, OH 44316-0001, USA
Owner Classification: Corporation/Partnership

Permit Contacts
Division of Environmental Permits:
Name: CHARLES D CRANSTON
Address: 270 MICHIGAN AVE
BUFFALO, NY 14203

Division of Air Resources:
Name: KEVIN M WATZ
Address: NYSDEC - REGION 9
270 MICHIGAN AVE
BUFFALO, NY 14203-2999
Phone:7168517130

Air Permitting Contact:
Name: MARK R CRAFT
Address: GOODYEAR DUNLOP TIRES NA LTD
PO BOX 1109
BUFFALO, NY 14240-1109
Phone:7168798497

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project
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 a typical organo-islane 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	Mixing Moles	Curing Moles
<300-310 degrees F	1	3
320-340 degrees F	2	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.

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.

Attainment Status

GOODYEAR DUNLOP TIRES NORTH AMERICA LTD is located in the town of TONAWANDA in the county of ERIE.

The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	MARGINAL NON-ATTAINMENT

Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.
** NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility 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.

Permit Structure and Description of Operations
The Title V permit for GOODYEAR DUNLOP TIRES NORTH AMERICA LTD is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.
A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

combustion	-	devices which burn fuel to generate heat, steam or power
incinerator	-	devices which burn waste material for disposal
control	-	emission control devices
process	-	any device or contrivance which may emit air contaminants that is not included in the above categories.

GOODYEAR DUNLOP TIRES NORTH AMERICA LTD is defined by the following emission unit(s):
Emission unit 00EU06 - 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.
Emission unit 00EU06 is associated with the following emission points (EP):
00811, 00812, 01004, 01007, 01206, 01301, 01307, 01310, 01311, 01406, 01407, 01408, 13S02, 13S04, 13S05, 13S06, 13S07, 13S09
It is further defined by the following process(es):
Process: 014 is located at 01, Building 08 - 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 BRIN G THEM BACK INTO THE RANGE OF ACCEPTABLE TOLERANCES FOR TIRE UNIFORMITY. OCCUPIED IN BLDG 8 AND 10.
Process: 015 is located at 01, Building 12 - FINISHING DEPT. 237. CURED TIRES ARE SENT TO FINISHING DEPT. 237 WHERE THEY ARE TESTED FOR UNIFORMITY. A SMALL PERCENTAGE (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 unit 00EU02 - 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 ,(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

Emission unit 00EU02 is associated with the following emission points (EP):
00125, 00126, 00128, 00129, 00132, 00134, 00135, 00138, 00140, 00144, 00146, 00147, 00151, 00152, 00153, 00155, 01F15, 01H17
It is further defined by the following process(es):
Process: 003 is located at MEZZANINE, Building 01 - 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 unit 00EU05 - 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.
Emission unit 00EU05 is associated with the following emission points (EP):
01006, 01104, 01105, 01404, 01405
It is further defined by the following process(es):
Process: 011 is located at 01, Building 11 - 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 ESTI MATED 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.
Process: 012 is located at 01, Building 10 - 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 PRODU CT 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.
Process: 013 is located at 01, Building 14 - TIRE BUILDING DEPT. 233. THE INSIDE OF GREEN TRUCK AND PASSENGAR 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 EQUI PMENT TIRES SPRAY BOOTH.

Emission unit 00EU03 - Modification #1 includes the installation of a vent, for employee comfort, over the "gum line" at the calandering area. The emissions were previouly accounted for as fugitve emissions and amount to approximately 300 pounds per year. This is identified as process- P009, ES26, EP- 02-19.
Emission unit 00EU03 is associated with the following emission points (EP):
00213, 00214, 00215, 00217, 00218, 00403, 00404, 00405, 00406, 00407, 00808, 00809, 00810, 02-19
It is further defined by the following process(es):
Process: 004 is located at 01, Building 02 - 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.
Process: 005 is located at 01, Building 04 - 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 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.
Process: 006 is located at 01, Building 02 - 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.
Process: 007 is located at 01, Building 02 - INNER LINER 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 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.
Process: 008 is located at 01, Building 04 - 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.
Process: P09 is located at 1, Building 02 - calandering, extrusion of sticky, thin rubber underlayment aides in adhering tread to carcass of tire during construction.

Emission unit 00EU07 - TIRES ARE TESTED FOR QA/QC PURPOSES. THIS INVOLVES CUTTING UP SAMPLES OF TIRES FOR ANALYTICAL TESTING AND INSPECTION.
Emission unit 00EU07 is associated with the following emission points (EP):
00614, 01005

Emission unit 00EU01 - 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, MANUFACTURED BY CLEAVER BROOKS, IS RATED AT 29.30 MMBTU/HR.
Emission unit 00EU01 is associated with the following emission points (EP):
00001, 00003, 00004
It is further defined by the following process(es):
Process: 001 is located at 01, Building 22 - 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. TH IS PACKAGE BOILER, MANUFACTURED BY CLEAVER BROOKS, IS RATED AT 29.30 MMBTU/HR.
Process: 002 is located at 01, Building 22 - #6 oil combustion in boilers. Steam is produced by a combination of 5 boilers that are fired by #6 oil. Boilers # 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 unit 00EU08 - 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 MICROWAV E IN THAT THE HIGH ENERGY IS PRODUCED BY HIGH VOLTAGE DC, ACCELERATED AND DIRECTED AT T HE 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.
Emission unit 00EU08 is associated with the following emission points (EP):
00410

Emission unit 00EU04 - 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.
Emission unit 00EU04 is associated with the following emission points (EP):
00219, 00220, 00401, 00402
It is further defined by the following process(es):
Process: 009 is located at 01, Building 04 - FABRIC CALENDERING DEPARTMENT 202. AS TIRE PLIES 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 PLIES 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.
Process: 010 is located at 01, Building 02 - 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.

Title V/Major Source Status
GOODYEAR DUNLOP TIRES NORTH AMERICA LTD is subject to Title V requirements. This determination is based on the following information:
This facility has an emission potential of a nonattainment contaminant which equals or exceeds the corresponding major facility size threshold in 231-2.12. It exceeds the major facility size threshold of 50

tpy VOC.

Program Applicability
The following chart summarizes the applicability of GOODYEAR DUNLOP TIRES NORTH AMERICA LTD with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	YES
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	NO
NSPS	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	NO
SIP	YES

NOTES:
PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's)

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US

EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's(hydrofluorocarbons)or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
3011	TIRES AND INNER TUBES

SCC Codes

SCC or Source Classification Code is a code developed and used by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
1-02-004-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL 10-100MMBTU/HR **
3-08-010-02	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISC PLASTIC PRODUCTS - PLASTIC PRODUCTS MANUFACTURING PLASTIC PRODUCTS MFG: EXTRUDER
3-08-001-15	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - TIRE MANUFACTURE CALENDERING
3-08-001-31	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - TIRE MANUFACTURE CALENDERING
3-08-001-27	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - TIRE MANUFACTURE COMPOUNDING
3-08-001-06	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - TIRE MANUFACTURE Green Tire Spraying
3-08-001-23	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - TIRE MANUFACTURE Green Tire Spraying
3-08-001-14	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - TIRE MANUFACTURE SIDEWALL EXTRUDER
3-08-001-13	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - TIRE MANUFACTURE TREAD EXTRUDER
3-08-005-01	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - TIRE RETREADING Tire Buffing Machines

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant , including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000092-52-4	1, 1 BIPHENYL(HAP)		> 0 but < 10 tpy
000079-34-5	1,1,2,2-TETRACHLOROETHANE(HAP)		> 0 but < 10 tpy
000120-82-1	1,2,4-TRICHLOROBENZENE(HAP)		> 0 but < 10 tpy
000084-74-2	1,2-BENZENEDICARBOXYLIC ACID, DIBUTYL ESTER(HAP)		> 0 but < 10 tpy
000107-06-2	1,2-DICHLOROETHANE(HAP)		> 0 but < 10 tpy
000106-99-0	1,3-BUTADIENE(HAP)		> 0 but < 10 tpy
000123-31-9	1,4-BENZENEDIOL(HAP)		> 0 but < 10 tpy
000123-91-1	1,4-DIETHYLENE DIOXIDE(HAP)		> 0 but < 10 tpy
000098-86-2	1-PHENYLETHANONE(HAP)		> 0 but < 10 tpy
000121-14-2	2,4, DINITRO TOLUENE(HAP)		> 0 but < 10 tpy
000051-28-5	2,4, DINITROPHENOL(HAP)		> 0 but < 10 tpy
000088-06-2	2,4,6 TRICHLOROPHENOL(HAP)		> 0 but < 10 tpy
000078-59-1	2-CYCLOHEXEN-1-ONE,3,5,5-TRIMETHYL(HAP)		> 0 but < 10 tpy
000095-48-7	2-METHYL-PHENOL(HAP)		> 0 but < 10 tpy
000108-10-1	2-PENTANONE, 4-METHYL(HAP)		> 0 but < 10 tpy
000140-88-5	2-PROPENOIC ACID, ETHYL ESTER(HAP)		> 0 but < 10 tpy
000091-94-1	3,3'-DICHLOROBENZIDINE(HAP)		> 0 but < 10 tpy
000119-90-4	3,3'-DIMETHOXYBENZIDINE(HAP)		> 0 but < 10 tpy
000107-05-1	3-CHLORO-1-PROPENE(HAP)		> 0 but < 10 tpy
000101-77-9	4,4'-DIAMINODIPHENYLMETHANE(HAP)		> 0 but < 10 tpy
000101-14-4	4,4-METHYLENE BIS(2-CHLOROANILINE)(HAP)		> 0 but < 10 tpy
000060-11-7	4-DIMETHYLAMINOAZOBENZENE(HAP)		> 0 but < 10 tpy
000092-93-3	4-NITROBIPHENYL(HAP)		> 0 but < 10 tpy
000075-07-0	ACETALDEHYDE(HAP)		> 0 but < 10 tpy
000108-05-4	ACETIC ACID ETHENYL ESTER(HAP)		> 0 but < 10 tpy

000075-05-8	ACETONITRILE(HAP)		> 0 but < 10 tpy
000107-02-8	ACROLEIN(HAP)		> 0 but < 10 tpy
000532-27-4	ALPHA-CHLOROACETOPHENONE(HAP)		> 0 but < 10 tpy
000062-53-3	ANILINE(HAP)		> 0 but < 10 tpy
000090-04-0	BENZENAMINE, 2-METHOXY(HAP)		> 0 but < 10 tpy
000095-53-4	BENZENAMINE, 2-METHYL(HAP)		> 0 but < 10 tpy
000121-69-7	BENZENAMINE, N, N-DIMETHYL(HAP)		> 0 but < 10 tpy
000071-43-2	BENZENE(HAP)		> 0 but < 10 tpy
000098-82-8	BENZENE, (1-METHYLETHYL)(HAP)		> 0 but < 10 tpy
000106-46-7	BENZENE, 1,4-DICHLORO-(HAP)		> 0 but < 10 tpy
000098-07-7	BENZENE, TRICHLOROMETHYL(HAP)		> 0 but < 10 tpy
000095-47-6	BENZENE,1,2-DIMETHYL(HAP)		> 0 but < 10 tpy
000092-87-5	BENZIDINE(HAP)		> 0 but < 10 tpy
000100-44-7	BENZYL CHLORIDE(HAP)		> 0 but < 10 tpy
000086-30-6	BEZENAMIDE, N-NITSOSO-N-PHENYL		> 0 but < 2.5 tpy
000117-81-7	BIS(2-ETHYLHEXYL) PHTHALATE(HAP)		> 0 but < 10 tpy
000075-25-2	BROMOFORM(HAP)		> 0 but < 10 tpy
007440-43-9	CADMIUM(HAP)		> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE		>= 25 tpy but < 40 tpy
000056-23-5	CARBON TETRACHLORIDE(HAP)		> 0 but < 10 tpy
000463-58-1	CARBONYL SULFIDE(HAP)		> 0 but < 10 tpy
000108-90-7	CHLOROBENZENE(HAP)		> 0 but < 10 tpy
000067-66-3	CHLOROFORM(HAP)		> 0 but < 10 tpy
007440-47-3	CHROMIUM(HAP)		> 0 but < 10 tpy
000132-64-9	DIBENZOFURAN(HAP)		> 0 but < 10 tpy
000075-09-2	DICHLOROMETHANE(HAP)		> 0 but < 10 tpy
000131-11-3	DIMETHYL PHTHALATE(HAP)		> 0 but < 10 tpy
000071-55-6	ETHANE, 1,1,1-TRICHLORO(HAP)		> 0 but < 10 tpy
000079-00-5	ETHANE, 1,1,2-TRICHLORO(HAP)		> 0 but < 10 tpy
000075-34-3	ETHANE, 1,1-DICHLORO-(HAP)		> 0 but < 10 tpy
000111-44-4	ETHANE, 1,1'-OXYBIS 2-CHLORO(HAP)		> 0 but < 10 tpy
000106-93-4	ETHANE, 1,2-DIBROMO(HAP)		> 0 but < 10 tpy
000075-00-3	ETHANE, CHLORO(HAP)		> 0 but < 10 tpy
000067-72-1	ETHANE, HEXACHLORO(HAP)		> 0 but < 10 tpy
000075-35-4	ETHENE,1,1-DICHLORO(HAP)		> 0 but < 10 tpy
000064-17-5	ETHYL ALCOHOL (ETHANOL)	78000	
000100-41-4	ETHYLBENZENE(HAP)		> 0 but < 10 tpy
0NY100-00-0	HAP		>= 10 tpy but < 25 tpy
000118-74-1	HEXACHLOROBENZENE(HAP)		> 0 but < 10 tpy
000087-68-3	HEXACHLOROBUTADIENE(HAP)		> 0 but < 10 tpy
000077-47-4	HEXACHLOROCYCLOPENTADIENE(HAP)		> 0 but < 10 tpy
000110-54-3	HEXANE(HAP)		> 0 but < 10 tpy
007439-92-1	LEAD(HAP)		> 0 but < 10 tpy
000062-75-9	METHANAMINE, N-METHYL-N-NITROSO(HAP)		> 0 but < 10 tpy
000074-83-9	METHYL BROMIDE(HAP)		> 0 but < 10 tpy
000074-87-3	METHYL CHLORIDE(HAP)		> 0 but < 10 tpy
000078-93-3	METHYL ETHYL KETONE(HAP)		> 0 but < 10 tpy
001634-04-4	METHYL TERTBUTYL ETHER(HAP)		> 0 but < 10 tpy
000091-20-3	NAPHTHALENE(HAP)		> 0 but < 10 tpy
001313-99-1	NICKEL OXIDE(HAP)		> 0 but < 10 tpy
000098-95-3	NITROBENZENE(HAP)		> 0 but < 10 tpy
000059-89-2	NITROSOMORPHOLINE(HAP)		> 0 but < 10 tpy
000119-93-7	O-TOLIDINE(HAP)		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	198000	
000106-89-8	OXIRANE, (CHLOROMETHYL)(HAP)		> 0 but < 10 tpy
010028-15-6	OZONE		> 0 but < 2.5 tpy
000092-67-1	P-AMINODIPHENYL(HAP)		> 0 but < 10 tpy
000100-02-7	PARA-NITROPHENOL(HAP)		> 0 but < 10 tpy
0NY075-00-0	PARTICULATES		> 0 but < 2.5 tpy

000082-68-8	PENTACHLORONITROBENZENE(HAP)	> 0 but < 10 tpy
000540-84-1	PENTANE, 2,2,4-TRIMETHYL-(HAP)	> 0 but < 10 tpy
000127-18-4	PERCHLOROETHYLENE(HAP)	> 0 but < 10 tpy
000108-95-2	PHENOL(HAP)	> 0 but < 10 tpy
000087-86-5	PHENOL, PENTACHLORO(HAP)	> 0 but < 10 tpy
0NY075-00-5	PM-10	>= 25 tpy but < 40 tpy
000106-50-3	P-PHENYLENEDIAMINE(HAP)	> 0 but < 10 tpy
000096-12-8	PROPANE, 1,2-DIBROMO-3-CHLORO(HAP)	> 0 but < 10 tpy
000075-56-9	PROPANE, 1,2-EPOXY-(HAP)	> 0 but < 10 tpy
000107-13-1	PROPENENITRILE(HAP)	> 0 but < 10 tpy
000123-38-6	PROPIONALDEHYDE(HAP)	> 0 but < 10 tpy
000100-42-5	STYRENE(HAP)	> 0 but < 10 tpy
007446-09-5	SULFUR DIOXIDE	988000
000108-88-3	TOLUENE(HAP)	> 0 but < 10 tpy
000079-01-6	TRICHLOROETHYLENE(HAP)	> 0 but < 10 tpy
000095-95-4	TRICHLOROPHENOL, 2,4,5(HAP)	> 0 but < 10 tpy
001582-09-8	TRIFLURALIN(HAP)	> 0 but < 10 tpy
000075-01-4	VINYL CHLORIDE(HAP)	> 0 but < 10 tpy
0NY998-00-0	VOC	>= 100 tpy but < 250 tpy
001330-20-7	XYLENE, M, O & P MIXT.(HAP)	> 0 but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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 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 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 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 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 - 6NYCRR 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 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 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 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 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)**
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.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	2-9
0-0EU03/-/004/0ES17	40CFR 60-BBB.542(a)(3)	Standards of performance for the rubber tire manufacturing industry - standards for VOC: Tread end cementing	44
0-0EU05	40CFR 60-BBB.542(a)(5)(i)	Standards of performance for the rubber tire manufacturing industry - standards for VOC	48
0-0EU05	40CFR 60-BBB.543(b)(4)	Standards of performance for the rubber tire manufacturing industry - performance test and compliance provisions	49
0-0EU03/-/004/0ES17	40CFR 60-BBB.543(d)	Standards of performance for the rubber tire manufacturing industry - performance test and compliance provisions	45
0-0EU05	40CFR 60-BBB.546(f)	Standards of performance for the rubber tire manufacturing industry - reporting requirements	50
0-0EU05	40CFR 60-BBB.546(j)	Standards of performance for the rubber tire manufacturing industry - reporting requirements	51
FACILITY	40CFR 68	Chemical accident prevention provisions	2-8
FACILITY	6NYCRR 200.3	False Statement.	1
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	2-10
FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	27, 37, 38
FACILITY	6NYCRR 201-6.5(c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	2-3
FACILITY	6NYCRR 201-6.5(c)(2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	2-4
FACILITY	6NYCRR 201-6.5(c)(3)(ii)	Permit conditions for	2-5

		Recordkeeping and Reporting of Compliance Monitoring	
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	2-1, 2-2
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	29
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	30
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	58
0-0EU06/-/015	6NYCRR 212.3(b)	General Process Emission Sources - emissions from existing emission sources	53
0-0EU06/-/015	6NYCRR 212.4	General Process Emission Sources - emissions from new sources and/or modifications	54
0-0EU02	6NYCRR 212.4(c)	General Process Emission Sources - emissions from new processes and/or modifications	1-8
0-0EU06	6NYCRR 212.4(c)	General Process Emission Sources - emissions from new processes and/or modifications	1-9
0-0EU02	6NYCRR 212.6	Opacity Limitation	42
0-0EU03	6NYCRR 212.6	Opacity Limitation	43
0-0EU04	6NYCRR 212.6	Opacity Limitation	46
0-0EU05	6NYCRR 212.6	Opacity Limitation	47
0-0EU06	6NYCRR 212.6	Opacity Limitation	52
0-0EU07	6NYCRR 212.6	Opacity Limitation	55
0-0EU08	6NYCRR 212.6	Opacity Limitation	56
0-0EU01/-/002	6NYCRR 225-1.2(a)(2)	Sulfur in Fuel Limitations Post 12/31/87.	61
0-0EU01/-/002	6NYCRR 225-1.8	Reports, sampling and analysis.	41
0-0EU01/-/002	6NYCRR 227-1.2(a)(2)	Particulate Emissions Firing Liquid Fuels Excluding Distillate Oil. (see narrative)	62
0-0EU01	6NYCRR 227-1.3	Smoke Emission Limitations.	40
FACILITY	6NYCRR 227-2.3	Compliance plan and deadlines.	39, 33, 34
FACILITY	6NYCRR 231-2.12		35
FACILITY	6NYCRR 231-2.13	Certification and registration of emission reductions from sources not subject to Part 201 of this Title	36
FACILITY	6NYCRR 231-2.2	Applicability	2-7, 2-6

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-301.
This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6NYCRR Part 201-1.4
This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR Part 201-6
This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6NYCRR Part 201-6.5(c)
This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6NYCRR Part 201-6.5(c)(2)
This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6NYCRR Part 201-6.5(e)
Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6NYCRR Part 202-2.1
Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6NYCRR Part 202-2.5
This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6NYCRR Part 211-.2
This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

40 CFR Part 68.
This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

Facility Specific Requirements
In addition to Title V, GOODYEAR DUNLOP TIRES NORTH AMERICA LTD has been determined to be subject to the following regulations:

40CFR 60-BBB.542 (a) (3)
(a) On and after the date on which the initial performance test, required by §60.8, is completed, but no later than 180 days after September 19, 1989, each owner or operator subject to the provisions in §60.540(b) shall not cause to be discharged into the atmosphere more than: 25 grams of VOC per tire processed for each month if the operation uses 25 grams or less of VOC per tire processed and does not employ a VOC emission reduction system

40CFR 60-BBB.542 (a) (5) (i)
(a) On and after the date on which the initial performance test, required by §60.8, is completed, but no later than 180 days after September 19, 1989, each owner or operator subject to the provisions in §60.540(b) shall not cause to be discharged into the atmosphere more than: 25 grams of VOC per tire processed for each month if the operation uses 25 grams or less of VOC per tire processed and does not employ a VOC emission reduction system

40CFR 60-BBB.543 (b) (4)
(4) The owner or operator of each tread end cementing operation and each green tire spraying operation using only water-based sprays (inside and/or outside) containing less than 1.0 percent, by weight, of VOC is not required to conduct a monthly performance test as described in paragraph (d) of this section. In lieu of conducting a monthly performance test, the owner or operator of each tread end cementing operation and each green tire spraying operation shall submit formulation data or the

results of Method 24 analysis annually to verify the VOC content of each tread end cement and each green tire spray material, provided the spraying formulation has not changed during the previous 12 months. If the spray material formulation changes, formulation data or Method 24 analysis of the new spray shall be conducted to determine the VOC content of the spray and reported within 30 days as required under §60.546(j).

40CFR 60-BBB.543 (d)
(d) For each tread end cementing operation and each green tire spraying operation where water-based cements or sprays containing 1.0 percent, by weight, of VOC or more are used (inside and/or outside) that do not use a VOC emission reduction system, the owner or operator shall use the following procedure to determine compliance with the g/tire limit specified under §60.542 (a)(3), (a)(5)(i), (a)(5)(ii), (a)(7)(i), and (a)(7)(ii).
(1) Determine the density and weight fraction VOC as specified under paragraph (c)(1) of this section.
(2) Calculate the total mass of VOC used at the affected facility for the month (Mo) as specified under paragraph (c)(2) of this section.
(3) Determine the total number of tires cemented or sprayed at the affected facility for the month (To) by the following procedure:
(I) For a trend end cementing operation, To equals the number of tread or combined tread/sidewall components that receive an application of tread end cement for the month.
(ii) For a green tire spraying operation that uses water-based inside green tire sprays, To equals the number of green tires that receive an application of water-based inside green tire spray for the month.
(iii) For a green tire spraying operation that uses water-based outside green tire sprays, To equals the number of green tires that receive an application of water-based outside green tire spray for the month.
(4) Calculate the mass of VOC used per tire cemented or sprayed at the affected facility for the month (G): $G = Mo/To$
(5) Calculate the mass of VOC emitted per tire cemented or sprayed at the affected facility for the month (N): $N = G$

40CFR 60-BBB.546 (f)
(f) For each tread end cementing operation and each bead cementing operation that use a VOC emission reduction system with a control device that destroys VOC (e.g., incinerator), the owner or operator shall use the following procedure to determine compliance with the emission limit specified under §60.542(a) (3) and (4).
(1) Calculate the mass of VOC used per tire cemented at the affected facility for the month (G), as specified under paragraphs (d) (1) through (4) of this section, or mass of VOC used per bead cemented at the affected facility for the month (Gb), as specified under paragraphs (e) (1) through (4) of this section.
(2) Calculate the mass of VOC emitted per tire cemented at the affected facility for the month (N) or mass of VOC emitted per bead cemented for the affected facility for the month (Nb):
$N = G (1 - R)$
$Nb = Gb (1 - R)$
For the initial performance test, the overall reduction efficiency (R) shall be determined as prescribed under paragraphs (f)(2)(i) through (iv) of this section. After the initial performance test, the owner or operator may use the most recently determined overall reduction efficiency (R) for the performance test. No monthly performance tests are required. The performance test shall be repeated during

conditions described under paragraph (b)(2) of this section.
(i) The owner or operator of an affected facility shall construct a temporary enclosure around the application and drying areas during the performance test for the purpose of capturing fugitive VOC emissions. The enclosure must be maintained at a negative pressure to ensure that all evaporated VOC are measurable. Determine the fraction (Fc) of total VOC used at the affected facility that enters the control device:

$$Fc = \frac{\left(\sum_{i-1}^{m} C_{bi}Q_{bi}\right)}{\left[\left(\sum_{i-1}^{m} C_{bi}Q_{bi}\right) + \left(\sum_{i-1}^{m} C_{fi}Q_{fi}\right)\right]}$$

Where:
"m" is the number of vents from the affected facility to the control device, and "n" is the number of vents from the affected facility to the atmosphere and from the temporary enclosure.
(ii) Determine the destruction efficiency of the control device (E) by using values of the volumetric flow rate of each of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the control device:

$$E = \frac{\left(\sum_{i-1}^{m} C_{bi}Q_{bi}\right) - \left(\sum_{i-1}^{m} C_{ai}Q_{ai}\right)}{\left(\sum_{i-1}^{m} C_{bi}Q_{bi}\right)}$$

Where:
"m" is the number of vents from the affected facility to the control device, and "p" is the number of vents after the control device.
(iii) Determine the overall reduction efficiency (R): R=EFc
(iv) The owner or operator of an affected facility shall have the option of substituting the following procedure as an acceptable alternative to the requirements prescribed under paragraph (f)(2)(i) of this section. This alternative procedure is acceptable only in cases where a single VOC is used and is present in the capture system. The average capture efficiency value derived from a minimum of three runs shall constitute a test.
(A) For each run, "i," measure the mass of the material containing a single VOC used. This measurement shall be made using a scale that has both a calibration and a readability to within 1 percent of the mass used during the run. This measurement may be made by filling the direct supply reservoir (e.g., trough, tray, or drum that is integral to the operation) and related application equipment (e.g., rollers, pumps, hoses) to a marked level at the start of the run and then refilling to the same mark from a more easily weighed container (e.g., separate supply drum) at the end of the run. The change in mass of the supply drum would equal the mass of material used from the direct supply reservoir. Alternatively, this measurement may be made by weighing the direct supply reservoir at the start and end of the run or by weighing the direct supply reservoir and related application equipment at the start and end of the run. The change in mass would equal the mass of the material used in the run. If only the direct supply reservoir is weighed, the amount of material in or on the related application equipment must be the same at the start and end of the run. All additions of VOC containing material made to the direct supply reservoir during a run must be properly

accounted for in determining the mass of material used during that run.
(B) For each run, "i," measure the mass of the material containing a single VOC which is present in the direct supply reservoir and related application equipment at the start of the run, unless the ending weight fraction VOC in the material is greater than or equal to 98.5 percent of the starting weight fraction VOC in the material, in which case, this measurement is not required. This measurement may be made directly by emptying the direct supply reservoir and related application equipment and then filling them to a marked level from an easily weighed container (e.g. separate supply drum). The change in mass of the supply drum would equal the mass of material in the filled direct supply reservoir and related application equipment. Alternatively, this measurement may be made by weighing the direct supply reservoir and related application equipment at the start of the run and subtracting the mass of the empty direct supply reservoir and related application equipment (tare weight).
(C) For each run, "i," the starting weight fraction VOC in the material shall be determined by Method 24 analysis of a sample taken from the direct supply reservoir at the beginning of the run.
(D) For each run, "i," the ending weight fraction VOC in the material shall be determined by Method 24 analysis of a sample taken from the direct supply reservoir at the end of the run.
(E) For each run, "i," in which the ending weight fraction VOC in the material is greater than or equal to 98.5 percent of the starting weight fraction VOC in the material, calculate the mass of the single VOC used (Mi) by multiplying the mass of the material used in the run by the starting weight fraction VOC of the material used in the run.
(F) For each run, "i," in which the ending weight fraction VOC in the material is less than 98.5 percent of the starting weight fraction VOC in the material, calculate the mass of the single VOC used (Mi) as follows:
(1) Calculate the mass of VOC present in the direct supply reservoir and related application equipment at the start of the run by multiplying the mass of material in the direct supply reservoir and related application equipment at the start of the run by the starting weight fraction VOC in the material for that run.
(2) Calculate the mass of VOC present in the direct supply reservoir and related application equipment at the end of the run by multiplying the mass of material in the direct supply reservoir and related application equipment at the end of the run by the ending weight fraction VOC in the material for that run. The mass of material in the direct supply reservoir and related application equipment at the end of the run shall be calculated by subtracting the mass of material used in the run from the mass of material in the direct supply reservoir and related application equipment at the start of the run.
(3) The mass of the single VOC used (Mi) equals the mass of VOC present in the direct supply reservoir and related application equipment at the start of the run minus the mass of VOC present in the direct supply reservoir and related application eqiupment at the end of the run.
(G) If Method 25A is used to determine the concentration of the single VOC in the capture system, then calculate the capture efficiency (FCi) for each run, "i," as follows:
Where:

$$FC_i = \frac{C_i\left(\frac{W}{V}\right)Q_i}{(M_i)(10^6)}$$

Ci = Average concentration of the single VOC in the capture system during run "i" (parts per million by volume) corrected for background VOC (see §60.547(a)(5)).
W = Molecular weight of the single VOC, expressed as mg per mg-mole.
V = 2.405X10-5 m3/mg-mole. This is the volume occupied by one mg-mole of ideal gas at standard

conditions (20ºC, 1 atmosphere) on a wet basis.
Qi = Volumetric flow in m3 in the capture system during run "i" adjusted to standard conditions (20ºC, 1 atmosphere) on a wet basis (see §60.547(a)(5)).
106 = ppm per unity.
Mi = Mass in mg of the single VOC used during run "i.".
(H) If Method 25 is used to determine the concentration of the single VOC in the capture system, then calculate the capture efficiency (FCi) for each run, "i," as follows:
Where: Ci = Average concentration of the single VOC in the capture system during run "i" (parts per million, as carbon, by volume) corrected for background VOC (see §60.547(a)(5)).
W = Molecular weight of the single VOC, expressed as mg per mg-mole.
V = 2.405X10-5 m3/mg-mole. This is the volume occupied by one mg-mole of ideal gas at standard conditions (20ºC, 1 atmosphere) on a wet basis.
Qi = Volumetric flow in m3 in the capture system during run "i" adjusted to standard conditions (20ºC, 1 atmosphere) on a dry basis (see §60.547(a)(5)).
106 = ppm per unity.
Mi = Mass in mg of the single VOC used during run "i".
NC = Number of carbon atoms in one molecule of the single VOC.
(I) Calculate the average capture efficiency value, Fc as follows:
Where:
"n" equals the number of runs made in the test (n > 3). In cases where an alternative procedure in this paragraph is used, the requirements in paragraphs (f)(2) (ii) and (iii) of this section remain unchanged.

<u>40CFR 60-BBB.546 (j)</u>
(j) Rather than seeking to demonstrate compliance with the provisions of §60.542(a) (1)(i), (2)(i), (6)(i), (7)(iii), (8)(i), (9)(i) using the performance test procedures described under paragraphs (g) and (i) of this section, an owner or operator of an undertread cementing operation, sidewall cementing operation, green tire spraying operation where organic solvent-based sprays are used, or Michelin-B operation that use a VOC emission reduction system may seek to demonstrate compliance by meeting the equipment design and performance specifications listed under paragraphs (j)(1), (2), and (4) through (6) or under paragraphs (j)(1) and (3) through (6) of this section, and by conducting a control device efficiency performance test to determine compliance as described under paragraph (j)(7) of this section. The owner or operator shall conduct this performance test of the control device efficiency no later than 180 days after initial startup of the affected facility, as specified under §60.8(a). Meeting the capture system design and performance specifications, in conjunction with operating a 95 percent efficient control device, is an acceptable means of demonstrating compliance with the standard. Therefore, the requirement for the initial performance test on the enclosure, as specified under §60.8(a), is waived. No monthly performance tests are required.
(1) For each undertread cementing operation, each sidewall cementing operation, and each Michelin-B operation, the cement application and drying area shall be contained in an enclosure that meets the criteria specified under paragraphs (j) (2), (4), and (5) of this section; for each green tire spraying operation where organic solvent-based sprays are used, the spray application and drying area shall be contained in an enclosure that meets the criteria specified under paragraphs (j) (3), (4), and (5) of this section.
(2) The drying area shall be enclosed between the application area and the water bath or to the extent necessary to contain all tire components for at least 30 seconds after cement application, whichever distance is less.

(3) Sprayed green tires shall remain in the enclosure for a minimum of 30 seconds after spray application.
(4) A minimum face velocity of 100 feet per minute shall be maintained continuously through each permanent opening into the enclosure when all temporary enclosure openings are closed. The cross-sectional area of each permanent opening shall be divided into at least 12 equal areas, and a velocity measurement shall be performed at the centroid of each equal area with an anemometer or similar velocity monitoring device; the face velocity of each permanent opening is the average value of the velocity measurements taken. The monitoring device shall be calibrated and operated according to the manufacturer's instructions.Temporary enclosure openings shall remain closed at all times except when worker access is necessary.
(5) The total area of all permanent openings into the enclosure shall not exceed the area that would be necessary to maintain the VOC concentration of the exhaust gas stream at 25 percent Of the lower explosive limit (LEL) under the following conditions:
(I) The facility is operating at the maximum solvent use rate;
(ii) The face velocity through each permanent opening is 100 feet per minute; and
(iii) All temporary openings are closed.
(6) All captured VOC are ducted to a VOC emission control device that is operated on a continuous basis and that achieves at least a 95 percent destruction or recovery efficiency.
(7) The efficiency of the control device (E) for the initial performance test is determined by using values of the volumetric flow rate of each of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the control device as described under paragraph (f)(2)(ii) of this section. The control device efficiency shall be redetermined during conditions specified under paragraph (b)(3) of this section.

6NYCRR 200 .3
No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

6NYCRR 201-6.5 (c) (3) (ii)
This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 212 .3 (b)
This rule requires existing sources (in operation on or before July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.15 grains per dry standard cubic foot.

6NYCRR 212 .4
This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for new (after July 1, 1973) process emission sources.

6NYCRR 212 .4 (c)
This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible

Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .6
(a) No person will cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water.

(b) Upon written application by a source owner or operator, the commissioner, at his discretion may accept for an emission source an equivalent opacity standard exceeding the opacity standard of subdivision (a) of this section, if the source owner can demonstrate through acceptable tests for such source that he is in compliance with all applicable emission requirements other than the opacity standard and that the source and any associated emission control equipment is being operated and maintained in a manner acceptable to the commissioner. An equivalent opacity standard for an emission source will only be granted where reasonably available control technology, as determined by the commissioner, has been utilized. In such cases, the source owner or operator will not cause or allow emissions to exceed the equivalent opacity.

6NYCRR 225-1.2 (a) (2)
This regulation prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations set forth in Table 1, Table 2, or Table 3 of this section.

6NYCRR 225-1.8
This regulation requires an owner or operator of a facility which purchases and fires coal and/or oil to s ubmit reports to the commissioner containing fuel analysis data, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1.

6NYCRR 227-1.2 (a) (2)
This rule limits particulate emissions to 0.20 pound per million Btu heat input from any stationary combustion installation with a maximum heat input capacity exceeding 50 million Btu per hour but no greater than 250 million Btu per hour using oil (other than distillate oil), coal tar, or any liquid fuel derived from coal.

6NYCRR 227-1.3
This regulation requires a limitation and compliance monitoring for opacity from a stationary combustion installation.

6NYCRR 227-2.3
This condition describes the need to develop a compliance plan for the NOx RACT requirements.

6NYCRR 231-2.12
§231-2.12 - Table 2 - Ozone nonattainment area and transport region classification for volatile organic compounds (VOC) and nitrogen oxides (NOx).

Ozone Nonattainment Area and Transport Region Classification for VOC and NOx

Area/Contaminant Classification	Major Facility Size Threshold (tons per year)1	Significant Source Project Threshold (tons per year)2	Significant Net Emission Increase Threshold (tons per year)3	Offset Ratio
Marginal, or Moderate, or Ozone Transport Region				
VOC	50	40	40	1.15:1 or more
NOx	100	40	40	1.15:1 or more
Severe				
VOC	25	2.5	more than 25	1.3:1 or more
NOx	25	2.5	more than 25	1.3:1 or more

1 - facility emission potential
2 - project emission potential
3 - net emission increase

6NYCRR 231-2.13
§ 231-2.13 Table 3 - Nonattainment area classification for particulate matter (PM-10) and carbon monoxide(CO).

Nonattainment Area Classification for PM-10 and CO

Area/contaminant Classification	Major facility size threshold (tons per year)1	Significant source project threshold (tons per year) 2	Significant net emission increase threshold (tons per year)3	Offset ratio
Moderate PM-10	100	15	15	1:1 or more
Moderate CO	354	100	100	1:1 or more

1 facility emission potential
2 project emission potential
3 net emission increase
4 The department may exempt a proposed major CO facility from the requirements of this Subpart if the facility emission potential for carbon monoxide is less than 100 tons per year, provided the source owner demonstrates to the satisfaction of the department that carbon monoxide emissions from the facility will not cause the significant air quality impact criteria in section 231-2.14 of this Subpart for carbon monoxide to be exceeded.

6NYCRR 231-2.2

In order to avoid NSR applicability and additional RACT controls, GDTNA Tonawanda will implement a facility-wide ethanol emissions cap of thirty-nine (39) tons per year (tpy) from the use of organo-silane coupling agents.

Compliance Certification

Summary of monitoring activities at GOODYEAR DUNLOP TIRES NORTH AMERICA LTD:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
0-0EU03/-/004/0ES17	record keeping/maintenance procedures	44
0-0EU05	record keeping/maintenance procedures	48
0-0EU05	record keeping/maintenance procedures	49
0-0EU03/-/004/0ES17	record keeping/maintenance procedures	45
0-0EU05	record keeping/maintenance procedures	50
0-0EU05	record keeping/maintenance procedures	51
FACILITY	record keeping/maintenance procedures	2-5
FACILITY	record keeping/maintenance procedures	2-2
FACILITY	record keeping/maintenance procedures	29
0-0EU06/-/015	record keeping/maintenance procedures	53
0-0EU06/-/015	record keeping/maintenance procedures	54
0-0EU02	record keeping/maintenance procedures	1-8
0-0EU06	record keeping/maintenance procedures	1-9
0-0EU02	record keeping/maintenance procedures	42
0-0EU03	record keeping/maintenance procedures	43
0-0EU04	record keeping/maintenance procedures	46
0-0EU05	record keeping/maintenance procedures	47
0-0EU06	record keeping/maintenance procedures	52
0-0EU07	record keeping/maintenance procedures	55
0-0EU08	record keeping/maintenance procedures	56
0-0EU01/-/002	monitoring of process or control device parameters as surrogate	61
0-0EU01/-/002	record keeping/maintenance procedures	41
0-0EU01/-/002	work practice involving specific operations	62
0-0EU01	monitoring of process or control device parameters as surrogate	40
FACILITY	work practice involving specific operations	34
FACILITY	record keeping/maintenance procedures	35
FACILITY	record keeping/maintenance procedures	36
FACILITY	work practice involving specific operations	2-7

Basis for Monitoring

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.