



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 9-1464-00030/00199

Renewal Number: 2

08/10/2010

Facility Identification Data

Name: GOODYEAR DUNLOP TIRES NORTH AMERICA LTD

Address: 3333 RIVER RD|10 SHERIDAN DR

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

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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

Application for renewal of Air Title V Facility permit identified as renewal # 2. The Title V permit includes minor changes that occurred during the previous permit term as follows: Addition of Resorcinol to the tire mix for export resulted in a new emission. A "cap" for resorcinol is included under 201-7.2;A



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change in the flow rate of the type "N" rotoclone to support additional tire maintenance activities; Minor changes to address equipment replacement or deletion.

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:

Goodyear Dunlop Tires North America LTD (GDTNA), Buffalo New York facility, is located at 10 Sheridan Dr. The Facility has approximately 1.9 million square feet of manufacturing and warehousing on 130+ acres of land. The facility produces truck, motorcycle, All Terrain Vehicle (ATV), and automobile tires.

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



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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 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 00004. This package boiler, manufactured by Cleaver Brooks, is rated at 29.30 mmbtu/hr and operates on natural gas only.

Emission unit 00EU01 is associated with the following emission points (EP):
00001, 00003, 00004

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. This 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 4 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.

Emission unit 00EU02 - Raw materials handling and mixing. Rubber is mixed in either "base" or "finish" banbury mixers. Base mixers take natural and synthetic rubber and combine them with carbon black, pigments and oils to produce a rubber "stock" that is further processed in the "finish" mixers. A powered fan is used to pull dust and fumes (mainly VOC's) off of the mixer and through a dust collector. Once the rubber "stock" is mixed it is rolled into a continuous sheet which is sent to a soap/water dip tank. This soap solution coats the rubber sheet so that it does not stick to itself. A hood over the dip tank exhausts through an uncontrolled emission point. From the soap tank the rubber "stock" is sent to a conveyor where ambient room air is blown across the sheet to dry the water and soap solution off of the rubber "stock" before it is wig-wagged onto a pallet. Finish mixers take rubber "stock" that has already passed through the base mixers and add various additives such as accelerators, zinc oxides, retarders, antioxidants and softeners to produce specific types of rubber used to "build" a tire.

Banbury No. 6 has changed 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.



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Organo-silane coupling agents are 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.

Also included in this emission unit is a refiner/warm up mill ventilation system, (emission source ES15-emission point 01-55) The # 9 banbury powder dump stations 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

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 00EU03 - Tread extrusion is 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.

Emission unit 00EU03 is associated with the following emission points (EP):
00213, 00214, 00215, 00217, 00218, 00405, 00406, 00407, 00413, 00808, 00809, 00810, 01008, 01009, 01010, 02-19

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 and striped with ink. 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



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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: 07A is located at Dept 238, Building 04 - Strip extrusion to combine several types of previously mixed rubber compounds. Extruder consists of a power driven screw with a stationary cylinder. A die is attached to the head of the screw to produce the desired shape of rubber. The extruder, located in Dept 238, is identified as ES21A and will have a warming mill, (ES22A) and vent out EP 04-13. Ink is transferred to the tread surface by an offset printer and or inkjet using water based inks.

Process: P09 is located at 1, Building 02 - Calendering, extrusion of sticky, thin rubber underlayment aides in adhering tread to carcass of tire during construction.

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 calendered 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, 00402, 00412, 04-11

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



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calender. 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.

Emission unit 00EU05 - The various components of a tire (bead, sidewall and tread) are manually assembled. The green tire is then sprayed with a release agent to aide in the molding/curing process. The green tire is loaded into an isostatic press that forms and vulcanizes the green tire. The tire is pressed and vulcanized by the same operation.

With permit modification # 1, 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, 01404, 01405, X1407

Process: 011 is located at 01, Building 11 - Tire building department. 209. 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 silicone, 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.

Process: 012 is located at 01, Building 10 - Tire building department 208. 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 silicone, 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. $1 \text{ day}/24 \text{ hr} \times 3000 \text{ tires per day} \times 35 \text{ g/tire} \times 1 \text{ lb}/454 \text{ g} \times 50\% \text{ solids} \times 5\% \text{ overspray} = 0.24 \text{ lb/hr solids}$. $340 \text{ day s/yr} \times 24 \text{ hr/day} \times 0.24 \text{ lb/hr} = 1,958.4 \text{ lb/yr solids}$.

Process: 013 is located at 01, Building 14 - Tire building department 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 silicone, 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.

Process: 13A is located at 01, Building 14 - Medium truck radials (MTR) tires are loaded into an isostatic press that forms and vulcanizes the tire. The tire is vulcanized and pressed by the same operation. Emissions from the tire presses are fugitive in nature as they exhaust through large ventilation fans located in a raised section of the roof above the tire presses.

Emission unit 00EU06 - Tires are tested for uniformity prior to shipment. During this process, excess rubber is sometimes mechanically ground off the tire to bring it into permissible specifications.

Included in this emission unit, by the permit modification #1, is a new tire repair station for ATV tires (Emission Point 10-07). The tire repair stations will be subject to the same particulate and opacity



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standards as the rest of the sources identified in this emission unit.

Emission unit 00EU06 is associated with the following emission points (EP):
00812, 01312, 01406

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 bring 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 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

Process: P07 is located at Building 06 - Cutting and buffing

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 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 manufactures 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

Process: P08 is located at 1, Building 04 - Electron processing system (ERB)- rubber ply is directed through a high voltage field which partly cures the rubber. Ozone is given off the high voltage equipment which is collected and exhausted through a fan and out a stack. No control equipment.

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:
The facility is major for Sulfur Dioxide, Volatile Organic Compounds and Carbon Monoxide emissions.

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

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PSD	NO
NSR (non-attainment)	NO
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



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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

1-02-004-02

EXTERNAL COMBUSTION BOILERS - INDUSTRIAL
INDUSTRIAL BOILER - RESIDUAL OIL
10-100MMBTU/HR **

1-02-006-02

EXTERNAL COMBUSTION BOILERS - INDUSTRIAL
INDUSTRIAL BOILER - NATURAL GAS
10-100 MMBtu/Hr

3-08-001-06

RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS
RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS -
TIRE MANUFACTURE
Green Tire Spraying

3-08-001-13

RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS
RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS -
TIRE MANUFACTURE
TREAD EXTRUDER

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3-08-001-14	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - TIRE MANUFACTURE SIDEWALL EXTRUDER
3-08-001-15	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - TIRE MANUFACTURE CALENDERING
3-08-001-23	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - TIRE MANUFACTURE Green Tire Spraying
3-08-001-26	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - TIRE MANUFACTURE TIRE CURING
3-08-001-27	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - TIRE MANUFACTURE COMPOUNDING
3-08-001-30	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - TIRE MANUFACTURE SIDEWALL EXTRUDER
3-08-001-31	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - TIRE MANUFACTURE CALENDERING
3-08-001-33	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - TIRE MANUFACTURE FINISHING
3-08-005-01	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - TIRE RETREADING Tire Buffing Machines
3-08-010-02	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISC PLASTIC PRODUCTS - PLASTIC PRODUCTS MANUFACTURING PLASTIC PRODUCTS MFG: EXTRUDER

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service 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

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CAS No. ONY100-00-0. 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		> 0 but < 10 tpy
000079-34-5	1,1,2,2-TETRACHLOROETHANE		> 0 but < 10 tpy
000120-82-1	1,2,4-TRICHLOROBENZENE		> 0 but < 10 tpy
000084-74-2	1,2-BENZENEDICARBOXYLIC ACID, DIBUTYL ESTER		> 0 but < 10 tpy
000107-06-2	1,2-DICHLOROETHANE		> 0 but < 10 tpy
000108-46-3	1,3-BENZENEDIOL	11250	
000106-99-0	1,3-BUTADIENE		> 0 but < 10 tpy
000123-31-9	1,4-BENZENEDIOL		> 0 but < 10 tpy
000123-91-1	1,4-DIETHYLENE DIOXIDE		> 0 but < 10 tpy
000098-86-2	1-PHENYLETHANONE		> 0 but < 10 tpy
000121-14-2	2,4, DINITRO TOLUENE		> 0 but < 10 tpy
000051-28-5	2,4, DINITROPHENOL		> 0 but < 10 tpy
000088-06-2	2,4,6 TRICHLOROPHENOL		> 0 but < 10 tpy
000078-59-1	2-CYCLOHEXEN-1-ONE,3,5,5-TRIMETHYL		> 0 but < 10 tpy
000095-48-7	2-METHYL-PHENOL		> 0 but < 10 tpy
000108-10-1	2-PENTANONE, 4-METHYL		> 0 but < 10 tpy
000140-88-5	2-PROPENOIC ACID, ETHYL ESTER		> 0 but < 10 tpy
000091-94-1	3,3'-DICHLOROBENZIDINE		> 0 but < 10 tpy
000119-90-4	3,3'-DIMETHOXYBENZIDINE		> 0 but < 10 tpy
000107-05-1	3-CHLORO-1-PROPENE		> 0 but < 10 tpy
000101-77-9	4,4'-DIAMINODIPHENYLMETHANE		> 0 but < 10 tpy
000101-14-4	4,4-METHYLENE BIS(2-CHLOROANILINE)		> 0 but < 10 tpy
000060-11-7	4-DIMETHYLAMINOAZOBENZENE		> 0 but < 10 tpy
000092-93-3	4-NITROBIPHENYL		> 0 but < 10 tpy
000075-07-0	ACETALDEHYDE		> 0 but < 10 tpy
000108-05-4	ACETIC ACID ETHENYL ESTER		> 0 but < 10 tpy
000075-05-8	ACETONITRILE		> 0 but < 10 tpy
000107-02-8	ACROLEIN		> 0 but < 10 tpy
000532-27-4	ALPHA-CHLOROACETOPHENONE		> 0 but < 10 tpy
000062-53-3	ANILINE		> 0 but < 10 tpy
000090-04-0	BENZENAMINE, 2-METHOXY		> 0 but < 10 tpy
000095-53-4	BENZENAMINE, 2-METHYL		> 0 but < 10 tpy
000121-69-7	BENZENAMINE, N, N-DIMETHYL		> 0 but < 10 tpy
000071-43-2	BENZENE		> 0 but < 10 tpy
000098-82-8	BENZENE, (1-METHYLETHYL)		> 0 but < 10 tpy
000106-46-7	BENZENE, 1,4-DICHLORO-		> 0 but < 10 tpy
000098-07-7	BENZENE, TRICHLOROMETHYL		> 0 but < 10 tpy
000095-47-6	BENZENE,1,2-DIMETHYL		> 0 but < 10 tpy
000092-87-5	BENZIDINE		> 0 but < 10 tpy
000100-44-7	BENZYL CHLORIDE		> 0 but < 10 tpy
000086-30-6	BEZENAMIDE, N-NITSOSO-		> 0 but < 2.5 tpy

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000117-81-7	N-PHENYL BIS(2-ETHYLHEXYL) PHTHALATE		> 0 but < 10 tpy
000075-25-2	BROMOFORM		> 0 but < 10 tpy
007440-43-9	CADMIUM		> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE		>= 25 tpy but < 40 tpy
000056-23-5	CARBON TETRACHLORIDE		> 0 but < 10 tpy
000463-58-1	CARBONYL SULFIDE		> 0 but < 10 tpy
000108-90-7	CHLORO BENZENE		> 0 but < 10 tpy
000067-66-3	CHLOROFORM		> 0 but < 10 tpy
007440-47-3	CHROMIUM		> 0 but < 10 tpy
000132-64-9	DIBENZOFURAN		> 0 but < 10 tpy
000075-09-2	DICHLOROMETHANE		> 0 but < 10 tpy
000131-11-3	DIMETHYL PHTHALATE		> 0 but < 10 tpy
000071-55-6	ETHANE, 1,1,1-TRICHLORO		> 0 but < 10 tpy
000079-00-5	ETHANE, 1,1,2-TRICHLORO		> 0 but < 10 tpy
000075-34-3	ETHANE, 1,1-DICHLORO-		> 0 but < 10 tpy
000111-44-4	ETHANE, 1,1'-OXYBIS 2- CHLORO		> 0 but < 10 tpy
000106-93-4	ETHANE, 1,2-DIBROMO		> 0 but < 10 tpy
000075-00-3	ETHANE, CHLORO		> 0 but < 10 tpy
000067-72-1	ETHANE, HEXACHLORO		> 0 but < 10 tpy
000075-35-4	ETHENE, 1,1-DICHLORO		> 0 but < 10 tpy
000064-17-5	ETHYL ALCOHOL (ETHANOL)	78000	
000100-41-4	ETHYLBENZENE		> 0 but < 10 tpy
0NY100-00-0	HAP	49800	
000118-74-1	HEXACHLORO BENZENE		> 0 but < 10 tpy
000087-68-3	HEXACHLOROBUTADIENE		> 0 but < 10 tpy
000077-47-4	HEXACHLOROCYCLOPENT ADIENE		> 0 but < 10 tpy
000110-54-3	HEXANE		> 0 but < 10 tpy
007439-92-1	LEAD		> 0 but < 10 tpy
000062-75-9	METHANAMINE, N- METHYL-N-NITROSO		> 0 but < 10 tpy
000074-83-9	METHYL BROMIDE		> 0 but < 10 tpy
000074-87-3	METHYL CHLORIDE		> 0 but < 10 tpy
000078-93-3	METHYL ETHYL KETONE		> 0 but < 10 tpy
001634-04-4	METHYL TERTBUTYL ETHER		> 0 but < 10 tpy
000091-20-3	NAPHTHALENE	19800	
001313-99-1	NICKEL OXIDE		> 0 but < 10 tpy
000098-95-3	NITROBENZENE		> 0 but < 10 tpy
000059-89-2	NITROSOMORPHOLINE		> 0 but < 10 tpy
000119-93-7	O-TOLIDINE		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	198000	
000106-89-8	OXIRANE, (CHLOROMETHYL)		> 0 but < 10 tpy
010028-15-6	OZONE		> 0 but < 2.5 tpy
000092-67-1	P-AMINODIPHENYL		> 0 but < 10 tpy
000100-02-7	PARA-NITROPHENOL		> 0 but < 10 tpy
0NY075-00-0	PARTICULATES		> 0 but < 2.5 tpy
000082-68-8	PENTACHLORONITROBEN ZENE		> 0 but < 10 tpy
000540-84-1	PENTANE, 2,2,4- TRIMETHYL-		> 0 but < 10 tpy
000127-18-4	PERCHLOROETHYLENE		> 0 but < 10 tpy
000108-95-2	PHENOL		> 0 but < 10 tpy
000087-86-5	PHENOL, PENTACHLORO		> 0 but < 10 tpy
0NY075-00-5	PM-10		>= 25 tpy but < 40 tpy
000106-50-3	P-PHENYLENEDIAMINE		> 0 but < 10 tpy
000096-12-8	PROPANE, 1,2-DIBROMO-3- CHLORO		> 0 but < 10 tpy
000075-56-9	PROPANE, 1,2-EPOXY-		> 0 but < 10 tpy

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000107-13-1	PROPENENITRILE	> 0 but < 10 tpy
000123-38-6	PROPIONALDEHYDE	> 0 but < 10 tpy
000100-42-5	STYRENE	> 0 but < 10 tpy
007446-09-5	SULFUR DIOXIDE	>= 250 tpy
000108-88-3	TOLUENE	> 0 but < 10 tpy
000079-01-6	TRICHLOROETHYLENE	> 0 but < 10 tpy
000095-95-4	TRICHLOROPHENOL, 2,4,5	> 0 but < 10 tpy
001582-09-8	TRIFLURALIN	> 0 but < 10 tpy
000075-01-4	VINYL CHLORIDE	> 0 but < 10 tpy
0NY998-00-0	VOC	85000
001330-20-7	XYLENE, M, O & P MIXT.	> 0 but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 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 B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 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 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: 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 D: 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,



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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 E: 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 F: 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 G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 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 H: Property Rights - 6 NYCRR 201-6.5(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.
- Item I: 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 J: 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;



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- 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 K: 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 L: 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



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under the Clean Air Act brought by the United States or any person.

Item M: 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	Condition	Short Description
-- FACILITY	ECL 19-0301	61	Powers and Duties of the Department with respect to air pollution control
0-0EU03/-/004/0ES17	40CFR 60- BBB.542 (a) (3)	47	Standards of performance for the rubber tire manufacturing industry - standards for VOC: Tread end cementing
0-0EU05	40CFR 60- BBB.542 (a) (5) (51	Standards of performance for the rubber tire manufacturing industry - standards for VOC
0-0EU05	40CFR 60- BBB.543 (b) (4)	52	Standards of performance for the rubber tire

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0-0EU03/-/004/0ES17	40CFR 60-BBB.543 (d)	48	manufacturing industry - performance test and compliance provisions Standards of performance for the rubber tire manufacturing industry - performance test and compliance provisions Standards of performance for the rubber tire manufacturing industry - reporting requirements
0-0EU05	40CFR 60-BBB.546 (f)	53	Standards of performance for the rubber tire manufacturing industry - reporting requirements
0-0EU05	40CFR 60-BBB.546 (j)	54	Standards of performance for the rubber tire manufacturing industry - reporting requirements
0-0EU02	40CFR 64	43, 44	COMPLIANCE ASSURANCE MONITORING
FACILITY	40CFR 68	22	Chemical accident prevention provisions
FACILITY	40CFR 82-F	23	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.3	24	False Statement.
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	11	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	62	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	12	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	13	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	14	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3 (a)	15	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	25, 28, 29, 34, 35	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5 (a) (4)	16	General conditions
FACILITY	6NYCRR 201-6.5 (a) (7)	2	General conditions
FACILITY	6NYCRR 201-6.5 (a) (8)	17	Fees
FACILITY	6NYCRR 201-6.5 (c)	3	General conditions Permit conditions for Recordkeeping and Reporting of
FACILITY	6NYCRR 201-6.5 (c) (2)	4	Compliance Monitoring Permit conditions for Recordkeeping and Reporting of Compliance Monitoring



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FACILITY	6NYCRR 201-6.5(c)(3)(ii)	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(d)(5)	18	Compliance schedules
FACILITY	6NYCRR 201-6.5(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.5(f)(6)	19	Off Permit Changes
FACILITY	6NYCRR 201-7	26, 27, 28, 29, 30, 31, 36	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 201-7.2	32, 37	Emissions capping using synthetic minor permits
0-0EU02/-/003	6NYCRR 201-7.2	45	Emissions capping using synthetic minor permits
FACILITY	6NYCRR 202-1.1	20	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	63	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	21	General Prohibitions - visible emissions limited
0-0EU06/-/015	6NYCRR 212.3(b)	57	General Process Emission Sources - emissions from existing emission sources
0-0EU06/-/015	6NYCRR 212.4	58	General Process Emission Sources - emissions from new sources and/or modifications
0-0EU02	6NYCRR 212.4(c)	41	General Process Emission Sources - emissions from new processes and/or modifications
0-0EU06	6NYCRR 212.4(c)	55	General Process Emission Sources - emissions from new processes and/or modifications
0-0EU02	6NYCRR 212.6	42	Opacity Limitation
0-0EU03	6NYCRR 212.6	46	Opacity Limitation
0-0EU04	6NYCRR 212.6	49	Opacity Limitation
0-0EU05	6NYCRR 212.6	50	Opacity Limitation
0-0EU06	6NYCRR 212.6	56	Opacity Limitation
0-0EU07	6NYCRR 212.6	59	Opacity Limitation
0-0EU08	6NYCRR 212.6	60	Opacity Limitation
FACILITY	6NYCRR 215	9	Open Fires
FACILITY	6NYCRR 215.2	10	Open Fires - Prohibitions
0-0EU01/-/002	6NYCRR 225-1.2(a)(2)	64	Sulfur in Fuel Limitations Post 12/31/87.
0-0EU01/-/002	6NYCRR 225-1.8	39	Reports, sampling and analysis.



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0-0EU01/-/002	6NYCRR 227.2(b)(1)	40	Particulate emissions.
0-0EU01/-/002	6NYCRR 227-1.2(a)(2)	65	Particulate Emissions Firing Liquid Fuels Excluding Distillate Oil. (see narrative)
0-0EU01	6NYCRR 227-1.3	38	Smoke Emission Limitations.
FACILITY	6NYCRR 227-2.3	31	Compliance plan and deadlines.
0-0EU02/-/003	6NYCRR 231-11.2(b)	45	Reasonable Possibility requirements for insignificant mods - less than 50% with excluded emissions
FACILITY	6NYCRR 231-2	27	New Source Review in Nonattainment Areas and Ozone Transport Region
FACILITY	6NYCRR 231-2.2	30	Applicability
FACILITY	6NYCRR 231-2.6(a)	33	Certification of emission reductions

Applicability Discussion:

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

ECL 19-0301

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.

6 NYCRR 200.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 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.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition,



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department representatives must be granted access to any facility which contains exempt emission sources or units, 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.

6 NYCRR 201-3.3 (a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to 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.

6 NYCRR Subpart 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.

6 NYCRR 201-6.5 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.5 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.5 (a) (8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 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.

6 NYCRR 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



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calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 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.

6 NYCRR 201-6.5 (d) (5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 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.

6 NYCRR 201-6.5 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calENDar year.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 211.3

This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.



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6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68

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

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

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

40 CFR 60.542 (a) (3)

This condition details the monitoring of Volatile Organic Compound content of Tire Spray to insure compliance for waterbase coating definition of VOC content less than 1% by weight.

40 CFR 60.542 (a) (5) (i)

40 CFR 60.543 (b) (4)

40 CFR 60.543 (d)

40 CFR 60.546 (f)

This condition details the monitoring of Volatile Organic Compound content of Tire Spray to insure compliance for waterbase coating definition of VOC content less than 1% by weight.

40 CFR 60.546 (j)



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40 CFR Part 64

The federal Compliance Assurance Monitoring (CAM) rule, 40 CFR Part 64, requires monitoring of control device, capture system, and/or process parameters to provide a reasonable assurance of compliance with emission limitations or standards. It applies to emission units that use a control device to comply with certain standards and limitations and that have potential pre-control device emissions equal to or greater than a major source threshold.

Acid Rain program requirements; stratospheric ozone protection requirements; post-1990 New Source Performance Standards, Emission Guidelines, and National Emission Standards for Hazardous Air Pollutants; and some other limitations are exempt from CAM. However, many of the exempt requirements are subject to less stringent periodic monitoring under 40 CFR Part 70 and 6NYCRR Subpart 201-6.

6 NYCRR 200.3

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

6 NYCRR 201-7.2

This section of Part 201-7 specifies the criteria that need to be met in order to restrict emissions to avoid Title V or other applicable requirements using federally enforceable permit conditions permit.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 212.6

6 NYCRR 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



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section.

6 NYCRR 225-1.8

This regulation requires an owner or operator of a facility which purchases and fires coal and/or oil to submit 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.

6 NYCRR 227.2 (b) (1)

This regulation is from the 1972 version of Part 227 and still remains as part of New York's SIP. The rule establishes a particulate limit of 0.10 lbs/mmBtu based on a 2 hour average emission for any oil fired stationary combustion installation.

6 NYCRR 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.

6 NYCRR 227-1.3

This regulation requires a limitation and compliance monitoring for opacity from a stationary combustion installation.

6 NYCRR 227-2.3

This condition describes the need to develop a compliance plan for the NOx RACT requirements.

6 NYCRR 231-11.2 (b)

This citation lists the record keeping requirements for insignificant modifications that are less than 50% of the applicable significant project threshold including excluded emissions as defined in Part 231-4.1(b)(40)(i)(c).

6 NYCRR 231-2.2

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In the New York City metropolitan area, carbon monoxide is also a non-attainment contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

The purpose of Section 231-2.2 is to define what new or modified facilities are subject to the requirements set forth in the other sections of the rule. In addition, certain exemptions to the rule are also defined in this section.



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6 NYCRR 231-2.6 (a)

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In the New York City metropolitan area, carbon monoxide is also a non-attainment contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

The requirements and criteria for creating and certifying emission reduction credits (ERCs) are set forth in section 231-2.6. Emission reduction credits must be created and certified on an emission unit basis.

6 NYCRR Subpart 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. Emissions Of Individual Hazardous air pollutants (HAP's), Total Annual HAP's and Nitrogen Oxides are limited to less than the title V thresholds of 10, 25 and 100 tpy respectively.

6 NYCRR Subpart 231-2

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

Compliance Certification

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

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring

0-0EU03/-/004/0ES17	47	record keeping/maintenance procedures
0-0EU05	51	record keeping/maintenance procedures
0-0EU05	52	record keeping/maintenance procedures
0-0EU03/-/004/0ES17	48	record keeping/maintenance procedures
0-0EU05	53	record keeping/maintenance procedures
0-0EU05	54	record keeping/maintenance procedures
0-0EU02	43	monitoring of process or control device parameters as surrogate
0-0EU02	44	monitoring of process or control device parameters as surrogate
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	27	monitoring of process or control device parameters as surrogate
FACILITY	28	work practice involving specific operations
FACILITY	29	work practice involving specific operations
FACILITY	30	work practice involving specific operations
FACILITY	31	work practice involving specific operations

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0-0EU02/-/003	45	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
0-0EU06/-/015	57	record keeping/maintenance procedures
0-0EU06/-/015	58	record keeping/maintenance procedures
0-0EU02	41	record keeping/maintenance procedures
0-0EU06	55	record keeping/maintenance procedures
0-0EU02	42	monitoring of process or control device parameters as surrogate
0-0EU03	46	record keeping/maintenance procedures
0-0EU04	49	record keeping/maintenance procedures
0-0EU05	50	record keeping/maintenance procedures
0-0EU06	56	record keeping/maintenance procedures
0-0EU07	59	record keeping/maintenance procedures
0-0EU08	60	record keeping/maintenance procedures
0-0EU01/-/002	64	monitoring of process or control device parameters as surrogate
0-0EU01/-/002	39	record keeping/maintenance procedures
0-0EU01/-/002	40	intermittent emission testing
0-0EU01/-/002	65	work practice involving specific operations
0-0EU01	38	monitoring of process or control device parameters as surrogate
FACILITY	33	record keeping/maintenance procedures

Basis for Monitoring

Facility is required to monitor emissions to determine compliance with “CAPS” for Hazardous Air Pollutants (HAPS), Nitrogen Oxides (NOx), Ethanol and Resorcinol as well as monitor control equipment operation for particulates and Volatile Organic Compound emissions. The HAPS cap limits the facility emissions so that the requirements of the boiler MACT do not apply. The NOx cap limits the emissions from the facility so that the control requirements of 6 NYCRR part 227-2 (Reasonable Available Control Technology for NOx) do not apply, the Ethanol and Resorcinol caps limit the facility to below New Source Review Applicability, and the monitoring of control equipment for particulates and VOC parameters insure compliance with 6 NYCRR part 212 and the NSPS for Rubber Tire Manufacturing.