



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-2911-00036/00151
Mod 0 Effective Date: 06/15/2009 Expiration Date: No expiration date.
Mod 1 Effective Date: 12/07/2009 Expiration Date: No expiration date.
Mod 2 Effective Date: 04/21/2011 Expiration Date: No expiration date.

Permit Issued To: GOODYEAR TIRE & RUBBER COMPANY
1144 E MARKET ST
AKRON, OH 44316

Facility: GOODYEAR CHEM PLANT
5500 GOODYEAR DR
NIAGARA FALLS, NY 14304

Contact: DANIEL M PLANTER
GOODYEAR CHEMICAL
5500 GOODYEAR DRIVE
NIAGARA FALLS, NY 14304-3110
(716) 236-2651

Description:
This permit modification represents changes to existing permit conditions described in the Air State Facility permit issued for Goodyear Chemical located in Niagara Falls, New York. The facility produces antioxidants which are used in tires and other products to prevent deterioration in the form of cracking or checking.

The state facility permit contains conditions limiting facility-wide potential emissions to less than major source thresholds through production limits. Federally enforceable permit conditions will limit emissions of VOC to less than 50 tons per year, total HAPs to less than 25 tons per year, and o-xylene, an individual HAPs to less than 10 tons per year. As a minor source, Goodyear will not be subject to the Title V permitting requirements of 6NYCRR, Part 201-6 and 40 CFR 63, Subpart FFFF Miscellaneous Organic Chemical Manufacturing (MON) NESHAP (National Emission Standards for Hazardous Air Pollutants). Emissions testing of elimination tanks D1 and D2 at current operating levels established a production limit of 3450 batches per year along with emission control equipment that would effectively limit facility emissions below major source thresholds.



The proposed modification incorporates:

- Increasing the number of batches processed by the sparkler filter (emission unit 32034) on an annual basis.
- Corrections to reflect that diphenylamine (DPA) is not classified as a hazardous air pollutant (HAP0).
- Updates to reflect stack test data for the centrifuge and drum flaker. (emission unit 000N3)
- Updates to clarify that Polystay 200 is also produced at the facility in addition to Polystay 100 and AZ (Polystay 100AZ).

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

Permit Administrator: DOUGLAS E BORSCHEL
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2915

Authorized Signature: _____ Date: ___ / ___ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
 - Applications for permit renewals, modifications and transfers
 - Permit modifications, suspensions or revocations by the Department
 - Permit modifications, suspensions or revocations by the Department

Facility Level

- Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS



DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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



Condition 1-1: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Item 1-1.1:

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

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

Condition 4: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

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

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

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

Condition 5: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

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

NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2915
(716) 851-7165

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00151

Facility DEC ID: 9291100036



Permit Under the Environmental Conservation Law (ECL)

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY
PERMIT**

IDENTIFICATION INFORMATION

Permit Issued To: GOODYEAR TIRE & RUBBER COMPANY
1144 E MARKET ST
AKRON, OH 44316

Facility: GOODYEAR CHEM PLANT
5500 GOODYEAR DR
NIAGARA FALLS, NY 14304

Authorized Activity By Standard Industrial Classification Code:
2869 - INDUSTRIAL ORGANIC CHEMICALS, NEC

Mod 0 Permit Effective Date: 06/15/2009
date.

Permit Expiration Date: No expiration

Mod 1 Permit Effective Date: 12/07/2009
date.

Permit Expiration Date: No expiration

Mod 2 Permit Effective Date: 04/21/2011
date.

Permit Expiration Date: No expiration



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 201-6.5 (g): Non Applicable requirements
- 2-1 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- *2-2 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *2-3 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *2-4 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *2-5 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 8 6 NYCRR 212.6 (a): Compliance Demonstration
- 9 6 NYCRR 212.10 (a): NO_x and VOC RACT at Major Facilities

Emission Unit Level

EU=0-ANIST

- 10 6 NYCRR 212.4 (b): Compliance Demonstration

EU=0-ANIST,Proc=AST,ES=0F106

- 11 40CFR 60.116b(b), NSPS Subpart Kb: Compliance Demonstration

EU=0-RECYC

- 12 6 NYCRR 212.3 (a): Compliance Demonstration

EU=0-RECYC,Proc=107

- 13 40CFR 60.116b(b), NSPS Subpart Kb: Compliance Demonstration

EU=0-TOLST

- 14 6 NYCRR 212.3 (a): Compliance Demonstration
- 15 40CFR 60.116b(b), NSPS Subpart Kb: Compliance Demonstration

EU=U-000D1,Proc=ETA

- 16 6 NYCRR 212.4 (a): Compliance Demonstration

EU=U-000D1,Proc=ETB

- 17 6 NYCRR 212.4 (a): Compliance Demonstration

EU=U-000N2

- 18 6 NYCRR 212.4 (a): Compliance Demonstration

EU=U-000N3

- 2-6 6 NYCRR 212.5 (d): Compliance Demonstration
- 19 6 NYCRR 212.5 (d): Compliance Demonstration

EU=U-000N4

- 21 6 NYCRR 212.4 (a): Compliance Demonstration

EU=U-32034

- 2-7 6 NYCRR 212.5 (d): Compliance Demonstration

EU=U-3393A,EP=3393A



23 6 NYCRR 212.4 (a): Compliance Demonstration

24 6 NYCRR 212.4 (a): Compliance Demonstration

EU=U-F0101

25 6 NYCRR 229.3 (e) (2) (iv): Compliance Demonstration

EU=U-F0112

26 6 NYCRR 229.3 (e) (2) (iv): Compliance Demonstration

EU=W-STWTR,EP=0C2EO,Proc=AIR

27 6 NYCRR 212.10 (c) (4) (i): Compliance Demonstration

EU=W-STWTR,EP=F1862,Proc=TAN

28 6 NYCRR 212.4 (a): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

29 ECL 19-0301: Contaminant List

1-3 6 NYCRR 201-1.4: Unavoidable noncompliance and violations

31 6 NYCRR Subpart 201-5: Emission Unit Definition

2-8 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

33 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit

34 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6 NYCRR 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 - 6 NYCRR 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 - 6 NYCRR 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 - 6 NYCRR 201-1.2

If an existing emission source was subject to the permitting requirements of 6 NYCRR 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 - 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 F: Recycling and Salvage - 6 NYCRR 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 - 6 NYCRR 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: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 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 I: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 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 J: Required Emission Tests - 6 NYCRR 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 6 NYCRR Subpart 202-1.

Item K: Visible Emissions Limited - 6 NYCRR 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 L: Open Fires Prohibitions - 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.

Item M: 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 N: 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.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Non Applicable requirements
Effective between the dates of 06/15/2009 and Permit Expiration Date

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

Item 1.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

6 NYCRR 229.1 (a)

Emission Unit: 0TOLST

Reason: Volatile liquid storage tanks emissions which are assigned an 'A' environmental rating are subject to the provisions of 6NYCRR, Part 212 rather than Part 229.

6 NYCRR 229.1 (a)

Emission Unit: 0RECYC

Reason: Volatile liquid storage tanks emissions which are assigned an 'A' environmental rating are subject to the provisions of 6NYCRR, Part 212 rather than Part 229.

Condition 2-1: Facility Permissible Emissions
Effective between the dates of 04/21/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 2-1.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

per year	CAS No: 000095-47-6 (From Mod 2)	PTE: 19,800 pounds
	Name: BENZENE,1,2-DIMETHYL	
per year	CAS No: 0NY100-00-0 (From Mod 2)	PTE: 49,800 pounds
	Name: HAP	
per year	CAS No: 0NY998-00-0 (From Mod 2)	PTE: 99,800 pounds



Name: VOC

Condition 2-2: Capping Monitoring Condition
Effective between the dates of 04/21/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 2-2.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR 201-6.1
40 CFR Part 63, Subpart FFFF

Item 2-2.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 2-2.3:

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.

Item 2-2.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 2-2.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 2-2.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000095-47-6	BENZENE,1,2-DIMETHYL
CAS No: 0NY998-00-0	VOC
CAS No: 0NY100-00-0	HAP

Item 2-2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes



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

Monitoring Description:

Potential total facility-wide emissions of o-xylene, an individual hazardous air pollutant (HAP), total HAPs and volatile organic compounds (VOC) from both permitted and exempt/trivial sources shall not exceed 9.9 tons, 24.9 tons and 49.9 tons respectively during any consecutive twelve month period. This emissions cap will establish the facility as a minor source of air pollution not subject to major source Title V permitting requirements of 6NYCRR, Part 201-6 and the requirements for HAPs emitted from Miscellaneous Organic Chemical Manufacturing facilities (National Emissions Standards for Hazardous Air Pollutants, 40 CFR Part 63 Subpart FFFF).

Compliance with this limit will be achieved by limiting the number of batches of antioxidant produced to 3,450 batches during any consecutive twelve month period.

An annual certification shall be submitted certifying that the facility emissions have remained below the emissions cap during any twelve month period for the calendar year. The report shall be sent to the New York State Department of Environmental Conservation, Division of Air Resources, 270 Michigan Avenue, Buffalo, New York, 14203.

Parameter Monitored: BATCHES
Upper Permit Limit: 3450 batches per year
Monitoring Frequency: MONTHLY
Averaging Method: 12-month total, rolled monthly
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2012.
Subsequent reports are due every 12 calendar month(s).

Condition 2-3: Capping Monitoring Condition
Effective between the dates of 04/21/2011 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 2-3.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR 201-6.1

Item 2-3.2:



An annual certification shall be submitted certifying that the facility emissions have remained below the emissions cap during any twelve month period for the calendar year. The report shall be sent to the New York State Department of Environmental Conservation, Division of Air Resources, 270 Michigan Avenue, Buffalo, New York, 14203.

Parameter Monitored: VOC
Upper Permit Limit: 49.9 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: 12-month total, rolled monthly
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2012.
Subsequent reports are due every 12 calendar month(s).

Condition 2-4: Capping Monitoring Condition
Effective between the dates of 04/21/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 2-4.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR 201-6.1
40 CFR Part 63, Subpart FFFF

Item 2-4.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 2-4.3:

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.

Item 2-4.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 2-4.5:

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00151

Facility DEC ID: 9291100036



The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 2-4.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000095-47-6 BENZENE,1,2-DIMETHYL

Item 2-4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Potential emissions of o-xylene, a hazardous air pollutant (HAP), from both permitted and exempt/trivial sources are limited to less than 10 tons during any consecutive twelve month period. Compliance with this limit will establish the facility as a minor source not subject to 6NYCRR, Part 201-6 Title V permitting requirements and the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing (MON), 40 CFR Part 63 Subpart FFFF. Compliance will be achieved by:

1.) Limiting the number of batches of antioxidant produced to 3,450 batches during any consecutive twelve month period. Based on this production rate, o-xylene emissions are calculated at 7.7 tons per year. Goodyear will keep records to demonstrate that facility production will not exceed the annual limit. The records are to be retained on-site in a format easily accessible to Department representatives on request.

2.) Monitoring and maintenance of the carbon bed on the air stripper discharge as established in the 6NYCRR, Part 212.10(c)(4)(i) monitoring condition for emission point 0C2EO located in emission unit WSTWTR.

An annual certification shall be submitted certifying that the facility emissions have remained below the emissions cap during any twelve month period for the calendar year. The report shall be sent to the New York State Department of Environmental Conservation, Division of Air Resources, 270 Michigan Avenue, Buffalo, New York, 14203.

Parameter Monitored: BENZENE,1,2-DIMETHYL

Upper Permit Limit: 9.9 tons per year

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00151

Facility DEC ID: 9291100036



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

Item 8.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall 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.

Compliance with this requirement shall be determined by the facility owner/operator conducting a daily survey of visible emissions whenever a process is in operation. If any visible emissions are identified, corrective action is required.

Records shall be kept on-site of the corrective action and made available to Department representatives on request.

The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: Method 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 9: NOx and VOC RACT at Major Facilities
Effective between the dates of 06/15/2009 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.10 (a)

Item 9.1:

Owners and/or operators of facilities located outside of the lower Orange County and New York City metropolitan areas with an annual potential to emit of 100 tons or more of nitrogen oxides or 50 tons or more of volatile organic compounds must comply with the requirements of section 212.10-Reasonably Available Control Technology for major facilities.

**** Emission Unit Level ****

Condition 10: Compliance Demonstration
Effective between the dates of 06/15/2009 and Permit Expiration Date



Applicable Federal Requirement:6 NYCRR 212.4 (b)

Item 10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-ANIST

Regulated Contaminant(s):
CAS No: 000062-53-3 ANILINE

Item 10.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Aniline emissions from storage tanks F0109 and F0106 are each vented to a carbon canister. The carbon will be monitored monthly using a combustion gas meter. When levels of aniline detected at the outlet of the carbon canisters exceed 10% of the lower explosive limit (LEL=1.3%), the carbon drums will be replaced within 24 hours.

Records shall be kept noting the date of each monthly reading and the VOC level detected along with the date of the carbon replacement.

The emission rate potential (ERP) from each tank has been calculated at less than 1 pound per hour. Aniline is assigned an environmental rating of 'A' and the canisters will provide a control efficiency of 95%. Consistent with the provisions of 6NYCRR, Part 212.4(b), this has been determined to be an acceptable degree of control.

Each tank has been equipped with submerged fill.

The facility shall keep on-site, records showing the dimension of each storage tank and an analysis showing the capacity of the tank. These records shall be kept on-site for the life of the vessel and made available to Department representatives on request.

Parameter Monitored: LOWER EXPLOSIVE LIMIT
Upper Permit Limit: 10 percent
Monitoring Frequency: MONTHLY

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00151

Facility DEC ID: 9291100036



Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 11: Compliance Demonstration
Effective between the dates of 06/15/2009 and Permit Expiration Date

Applicable Federal Requirement:40CFR 60.116b(b), NSPS Subpart Kb

Item 11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-ANIST

Process: AST

Emission Source: 0F106

Regulated Contaminant(s):

CAS No: 000062-53-3 ANILINE

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The New Source Performance Standards (NSPS), for Volatile Organic Liquid Storage Vessels, 40CFR Part 60.110b is applicable to each storage tank with a capacity greater than 40 cubic meters (10,568 gallons) which have commenced construction or modification after July 23, 1984.

The aniline storage tanks identified as tank F0106 having a capacity of 15,900 gallons and a start-up date of 07/01/1986 is subject only to the recordkeeping requirements of this subpart as specified in paragraph (b) of 60.116b.

(b) The facility shall keep on-site, records showing the dimension of the storage tank and an analysis showing the capacity of the tank. These records shall be kept on-site for the life of the vessel and made available to Department representatives on request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 12: Compliance Demonstration
Effective between the dates of 06/15/2009 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.3 (a)

Item 12.1:

The Compliance Demonstration activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00151

Facility DEC ID: 9291100036



Emission Unit: 0-RECYC

Regulated Contaminant(s):

- CAS No: 000095-53-4 BENZENAMINE, 2-METHYL
- CAS No: 000108-95-2 PHENOL
- CAS No: 000122-39-4 BENZENAMINE, N-PHENYL
- CAS No: 001300-73-8 BENZENAMINE,AR,AR-DIMETHYL- C8H11N
- CAS No: 000062-53-3 ANILINE

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The recycle tanks identified as F0103, F0104 and F0107 contain a mixture of aniline, phenol, o-toluidine, diphenylamine (DPA), and mixed xyldines. Each of these contaminants is assigned an environmental rating of 'A' with emission rate potentials calculated as less than 1 pound per hour. The tanks have submerged fill and along with the preventative maintenance program established by the facility will constitute compliance with 6NYCRR, Part 212.

Goodyear shall make available records of tank inspection and maintenance to this Department on request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 13: Compliance Demonstration

Effective between the dates of 06/15/2009 and Permit Expiration Date

Applicable Federal Requirement:40CFR 60.116b(b), NSPS Subpart Kb

Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-RECYC

Process: 107

Regulated Contaminant(s):

- CAS No: 0NY998-00-0 VOC

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The New Source Performance Standards (NSPS), for Volatile



Organic Liquid Storage Vessels, 40CFR Part 60.110b is applicable to each storage tank with a capacity greater than 40 cubic meters (10,568 gallons).

The recycle storage tank identified as tank F0107, having a capacity of 14,768 gallons and a start-up date of 04/1986 is subject only to the recordkeeping requirements of this subpart as specified in paragraph (b) of 60.116b.

(b) The facility shall keep on-site, records showing the dimension of the storage tank and an analysis showing the capacity of the tank. These records shall be kept on-site for the life of the vessel and made available to Department representatives on request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 14: Compliance Demonstration
Effective between the dates of 06/15/2009 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.3 (a)

Item 14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-TOLST

Regulated Contaminant(s):

CAS No: 000095-53-4 BENZENAMINE, 2-METHYL

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

o-Toluidine, a hazardous air pollutant (HAP) and "A" rated contaminant, is unloaded from tank trucks or railcars into temperature controlled atmospheric storage vessels identified as emission sources F0108 and F0110. Emissions of o-toluidine are assigned an environmental rating of 'A' and the emission rate potential has been calculated as less than 1 pound per hour. The tanks are equipped with submerged fill and conservation vents and along with the preventative maintenance program established by the facility will constitute compliance with 6NYCRR, Part 212.

Goodyear shall make available records of tank inspection

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00151

Facility DEC ID: 9291100036



and maintenance to this Department on request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 15: Compliance Demonstration
Effective between the dates of 06/15/2009 and Permit Expiration Date

Applicable Federal Requirement:40CFR 60.116b(b), NSPS Subpart Kb

Item 15.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-TOLST

Regulated Contaminant(s):

CAS No: 000095-53-4 BENZENAMINE, 2-METHYL

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The New Source Performance Standards (NSPS), for Volatile Organic Liquid Storage Vessels, 40CFR Part 60.110b is applicable to each storage tank with a capacity greater than 40 cubic meters (10,568 gallons) which have commenced construction or modification after July 23, 1984.

The o-toluidine storage tanks identified as tank F0108 and F0110, each having a capacity of 15,928 gallons and a start-up dates of 08/01/1990 and 10/01/1987 respectively, are subject only to the recordkeeping requirements of this subpart as specified in paragraph (b) of 60.116b.

(b) The facility shall keep on-site, records showing the dimension of the storage tank and an analysis showing the capacity of the tank. These records shall be kept on-site for the life of the vessel and made available to Department representatives on request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 16: Compliance Demonstration
Effective between the dates of 06/15/2009 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (a)

Item 16.1:

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00151

Facility DEC ID: 9291100036



The Compliance Demonstration activity will be performed for:

Emission Unit: U-000D1

Process: ETA

Regulated Contaminant(s):

CAS No: 000095-47-6	BENZENE,1,2-DIMETHYL
CAS No: 000095-53-4	BENZENAMINE, 2-METHYL
CAS No: 000108-95-2	PHENOL
CAS No: 000062-53-3	ANILINE

Item 16.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The emission rate potentials (from elimination tank #1) of xylene, aniline, phenol, and o-toluidine which are less than 1 pound per hour for each contaminant will be controlled by two outlet heat exchangers(condensers) connected in series. An Air Guide-1 analysis indicates the potential aniline impact to be 3.4% of the AGC(0.6ug/m3). The potential impact of o-toluidine is 0.17% of the AGC(21 ug/m3). The potential annual impacts are restricted by the 3450 batch per year limit.

The elimination tank #1 heat exchanger system temperatures will be continuously monitored at the condenser outlet to verify that the system is operating properly. Once per shift, the operator reviews the thermal temperature data for the condenser outlet and records the outlet temperature on a log sheet. This data will be maintained on-site for a period of five years, along with a log of condenser maintenance and repair activities. In the event that the process stream temperature exceeds 50 degrees centigrade from the first exchanger (cooling tower water), the facility will immediately respond and conduct an investigation to determine the cause of the elevated temperature. If the temperature exceeds 45 degrees centigrade from the second exchanger (chilled water), the cause of the elevated temperature will be investigated and corrective actions implemented if necessary, including but not limited to heat exchanger cleaning if exchangers are plugged. (Note: At times when the process is not venting a gas stream to the condensers, the ambient temperature in the area can cause the temperature to rise above 45 degrees C).

Heat exchangers are covered by the Plant Process Safety Management Program which includes mechanical integrity inspections performed according to PSM regulations and



maintained accordingly.

Parameter Monitored: TEMPERATURE

Upper Permit Limit: 45 degrees Centigrade (or Celsius)

Monitoring Frequency: PER SHIFT

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 17: Compliance Demonstration
Effective between the dates of 06/15/2009 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.4 (a)

Item 17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-000D1

Process: ETB

Regulated Contaminant(s):

CAS No: 000095-47-6 BENZENE,1,2-DIMETHYL

Item 17.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAPs) from Elimination Tank 2 are controlled by a one outlet two pass vapor condenser system. The efficiency of the condenser systems is estimated at 80 %. The emission rate potential of xylene, is less than 3 pounds per hour; aniline, phenol and o-toluidine which are 'A' rated contaminants are less than 1 pound per hour.

An Air Guide-1 analysis of aniline emissions from EP 000D2 indicates the actual annual impact to be at 8.5% of the AGC(0.6 ug/m3) and the potential aniline impact is 21% of the AGC. The potential o-toluidine impact is 0.15% of the AGC (21 ug/m3). Potential xylene impacts are at 2.8% of the AGC(100 ug/m3). The potential annual impacts are restricted by the 3450 batch per year limit.

The elimination tank #2 heat exchanger system temperatures will be continuously monitored at the condenser outlet to verify that the system is operating properly. Once per shift, the operator reviews the thermal temperature data for the condenser outlet and records the outlet temperature on a log sheet. This data will be maintained



on-site for a period of five years, along with a log of condenser maintenance and repair activities. In the event that the condenser vent gas temperature exceeds 45 degrees centigrade from the heat exchanger (chilled water), the cause of the elevated temperature will be investigated and corrective actions implemented if necessary, including but not limited to heat exchanger cleaning if exchangers are plugged. (Note: At times when the process is not venting a gas stream to the condensers, the ambient temperature in the area can cause the temperature to rise above 45 degrees C).

Heat exchangers are covered by the Plant Process Safety Management Program which includes mechanical integrity inspections performed according to PSM program and maintained accordingly.

Parameter Monitored: TEMPERATURE

Upper Permit Limit: 45 degrees Centigrade (or Celsius)

Monitoring Frequency: PER SHIFT

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 18: Compliance Demonstration
Effective between the dates of 06/15/2009 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.4 (a)

Item 18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-000N2

Regulated Contaminant(s):

CAS No: 000122-39-4 BENZENAMINE, N-PHENYL

Item 18.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The emission rate potential of diphenylamine, an "A" rated compound, exceeds 1 pound per hour and will require an emission control efficiency of 99% for the dust collector on the packaging system. Compliance with the provisions of 6NYCRR, Part 212.4(a) and 212.9 Table 2 will be demonstrated by the operation of the fabric filter dust collector system in accordance with the operational and preventative maintenance programs established by Goodyear.



An Air Guide-1 analysis indicates potential annual impacts of diphenylamine from this source to be 21.2% of the AGC (24 ug/m³) and actual impacts to be 0.34% of the AGC.

The pressure drop across the antioxidant packaging dust collector will be continuously indicated and recorded by the operator once per shift to verify that the system is operating properly. The differential pressure operating range for the dust collector is between 2 and 11 inches of water. In the event that the pressure drop is out of range, the facility will respond immediately and conduct an incident investigation to determine the cause. If the condition cannot be readily resolved and visible emissions are observed from the stack, the system will be shut down until the condition is remedied.

The exception will occur when new bags are installed in the dust collector and until they are coated, a differential pressure of less than 2" of water may occur.

Records of the pressure drop readings and baghouse maintenance (including bag replacements) shall be kept on-site for a period of 5 years and made available to Department representatives on request.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 2 inches of water

Upper Permit Limit: 11 inches of water

Monitoring Frequency: PER SHIFT

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-6: Compliance Demonstration
Effective between the dates of 04/21/2011 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.5 (d)

Item 2-6.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-000N3

Regulated Contaminant(s):

CAS No: 000122-39-4 BENZENAMINE, N-PHENYL

CAS No: 000095-53-4 BENZENAMINE, 2-METHYL

Item 2-6.2:

Compliance Demonstration shall include the following monitoring:



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

Monitoring Description:

The Trimer scrubber which was installed in 1992 controls emissions of DPA, o-toluidine, aniline, phenol and xylene and other compounds. Stack testing performed in March 2010, indicates that when the centrifuge and flaker are operating simultaneously, the emission rate potential (ERP) of diphenylamine (DPA) is in excess of 1 pound per hour and as an 'A' rated compounds is required by 6NYCRR, Part 212.4(a) and Table 2 to be controlled to a minimum of 99%. The Tri-mer scrubber which was installed in 1992 has been conservatively estimated to have a control efficiency of 90%. An Air Guide-1 screening for DPA indicates that the potential annual concentration (1.06#/hour) for DPA to be 5.5% of the AGC (24 ug/m³). The short-term (1-hour) impact is calculated at 11.91 ug/m³ or 0.5% of the short term guideline concentration (SGC) of 2400 ug/m³.

Emission rate potentials for aniline and o-toluidine 'A' rated compounds, are estimated to be less than 1 pound per hour. An Air Guide-1 screening for aniline indicates the potential impact at 133% of the AGC (0.6 ug/m³) and an actual annual impact at 79% of the AGC. Potential o-toluidine impacts are 2.95% of the SGC (880 ug/m³) and 10% of the AGC (21 ug/m³). The potential annual impact will be restricted by the 3450 batch per year limit on which the actual impacts are based. Phenol and xylene emissions were also evaluated and determined to be below their respective AGC and SGC's.

A discussion of various control technologies was submitted in 02/20/2009. In consideration of the ERPs and associated AGC and SGC impacts, the scrubber and 90% control efficiency will be accepted as Best Available Control Technology (BACT) for DPA and meeting the requirements of 6NYCRR, Part 212.4(a).

Should new scientific evidence from a recognized institution result in a decision by this Department that lower ambient guideline concentrations be established for DPA, aniline or o-toluidine, it may be necessary to reduce emissions from this source.

Parameter Monitored: BATCHES

Upper Permit Limit: 3450 batches per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



Condition 19: Compliance Demonstration
Effective between the dates of 06/15/2009 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.5 (d)

Item 19.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-000N3

Regulated Contaminant(s):

CAS No: 000062-53-3	ANILINE
CAS No: 000095-47-6	BENZENE,1,2-DIMETHYL
CAS No: 000095-53-4	BENZENAMINE, 2-METHYL
CAS No: 000108-95-2	PHENOL
CAS No: 000122-39-4	BENZENAMINE, N-PHENYL

Item 19.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The Tri-mer scrubber associated with the drum flaker, re-melt tank, centrifuge and belt pastille is used to control emissions of diphenylamine, aniline, o-toluidine, xylene, and phenol. In order to maintain the minimum scrubber efficiency of 90%, the differential pressure across the column (6-12 inches) and the minimum level in the scrubber reservoir (4-8 inches of water) are recorded by the operator once per shift. Readings outside the established operating ranges will require the facility to immediately respond and conduct an investigation to determine the cause of those readings. If, based on that investigation, the facility reasonably determines the scrubber may not be operating at or above a minimum efficiency of 90% and cannot easily or quickly be made to operate at or above the minimum efficiency, the system will be shut down until corrective action can be completed.

Readings shall be kept in a format easily accessible by Department representatives and be made available on request. Records are to be kept on-site for a period of five years.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 6 inches of water

Upper Permit Limit: 12 inches of water

Monitoring Frequency: PER SHIFT

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED



RANGE AT ANY TIME
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 21: Compliance Demonstration
Effective between the dates of 06/15/2009 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.4 (a)

Item 21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-000N4

Regulated Contaminant(s):

CAS No: 000122-39-4 BENZENAMINE, N-PHENYL

Item 21.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The emission rate potential of diphenylamine, an "A" rated compound, exceeds 1 pound per hour and will require an emission control efficiency of 99% for the dust collector on the vibratory conveyor and bucket elevator system. Compliance with the provisions of 6NYCRR, Part 212.4(a) and 212.9 Table 2 will be demonstrated by the operation of the fabric filter dust collector system in accordance with the operational and preventative maintenance programs established by Goodyear.

The pressure drop across the bucket elevator dust collector will be continuously indicated and recorded by the operator once per shift to verify that the system is operating properly. The differential pressure operating range for the dust collector is between 2 and 11 inches of water. In the event that the pressure drop is out of range, the facility will respond immediately and conduct an incident investigation to determine the cause. If the condition cannot be readily resolved and visible emissions are observed from the stack, the system will be shut down until the condition is remedied.

The exception will occur when new bags are installed in the dust collector and until they are coated, a differential pressure of less than 2" of water may occur.

Records of the pressure drop readings and baghouse maintenance (including bag replacements) shall be kept on-site for a period of 5 years and made available to



Department representatives on request

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 2 inches of water

Upper Permit Limit: 11 inches of water

Monitoring Frequency: PER SHIFT

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-7: Compliance Demonstration
Effective between the dates of 04/21/2011 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.5 (d)

Item 2-7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-32034

Regulated Contaminant(s):

CAS No: 000095-53-4 BENZENAMINE, 2-METHYL

CAS No: 000122-39-4 BENZENAMINE, N-PHENYL

CAS No: 000062-53-3 ANILINE

Item 2-7.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The sparkler filter processes approximately 238 batches per year of Nailax, AZ, and Polystay 200. The filter is used for Nailax when the centrifuge is down and for all AZ and Polystay 200 produced by the facility. Emissions are generated for approximately one hour when the filter is opened for cleaning. Cleaning is typically performed after processing 2 batches.

Emissions from the sparkler filter are subject to the control requirements of 6NYCRR, Part 212.4(a) and as indicated in 6NYCRR, Part 212.9 Table 2. The emission rate potential of diphenylamine (DPA) is 1.56 #/hour and assigned an environmental rating of 'A' would require 99% emissions control. Aniline and o-toluidine emissions, also 'A' rated compounds, are less than one pound per hour. There currently is no emissions control for this source.

An Air Guide-1 analysis indicates that potential annual impacts are 41.4% of the AGC (annual guideline concentration) for DPA (24ug/m³), 19.1% for aniline (0.6

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00151

Facility DEC ID: 9291100036



ug/m3) and 1.6% for o-Toluidine (21ug/m3). Actual AGC impacts are 0.56% for DPA, 0.25% for aniline, and 0.02% for o-toluidine.

The potential short term impacts and short-term guideline concentrations(SGC) for aniline is 0.812 (760ug/m3); DPA is 69.35 ug/m3 (2400 ug/m3); o-toluidine is 2.4 ug/m3 (880 ug/m3).

This emission stream having limited hours would not be cost effective to control. Therefore, in consideration of the actual AGC impact and the restriction of 238 batches per year, no control will be accepted as BACT.

If lower ambient guideline concentrations are established, then a revised analysis will be required, and based on those results it may be necessary to reduce emissions from this source.

Records of the number of batches processed through the sparkler filter in each year are to be kept on-site and made available to Department representatives on request.

Parameter Monitored: BATCHES

Upper Permit Limit: 238 batches per year

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 23: Compliance Demonstration
Effective between the dates of 06/15/2009 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (a)

Item 23.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-3393A

Emission Point: 3393A

Regulated Contaminant(s):

CAS No: 000123-31-9

1,4-BENZENEDIOL

Item 23.2:

Compliance Demonstration shall include the following monitoring:

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



Monitoring Description:

The pressure drop across the hydroquinone dust collector is monitored and recorded by the operator once per shift to verify that the system is operating properly. Pressure drop readings out of range are an indicator of potential cartridge or unit malfunction. In the event that the differential pressure (2-11 inches of water) is out of range, the shift supervisor is notified and will immediately initiate a diagnostic inspection to determine the problem and institute corrective action. If the condition cannot be easily resolved, the system will be shut down until the condition is remedied. Spare filter cartridges are to be kept on-site to expedite replacement.

The exception will occur when new bags are installed in the dust collector and until they are coated, a differential pressure of less than 2" of water may occur.

Monthly QA/QC procedures are required to confirm that the differential pressure gauge is operating properly by disconnecting the pressure taps and checking for zero. In addition, inspection and calibration of the gauge is performed on an annual basis as part of the facility preventative maintenance program. Malfunctioning gauges are repaired or replaced promptly.

Differential pressure readings and a log of baghouse maintenance and repair activities undertaken at the facility will be maintained on-site for a period of 5 years and made available to Department representatives on request.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 2 inches of water

Upper Permit Limit: 11 inches of water

Monitoring Frequency: PER SHIFT

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 24: Compliance Demonstration
Effective between the dates of 06/15/2009 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.4 (a)

Item 24.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-3393A

Emission Point: 3393A

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00151

Facility DEC ID: 9291100036



Regulated Contaminant(s):

CAS No: 000123-31-9 1,4-BENZENEDIOL

Item 24.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Hydroquinone (1,4-Benzenediol), a hazardous air pollutant (HAP), is discharged from bulk bags into a pre-mix tank. Dust from charging is captured by a hood and directed to a baghouse with a reported control efficiency of 99%. Particulate emissions of hydroquinone from this process are subject to the control requirements of 6NYCRR, Part 214(a) Table 2. Emissions are assigned an 'A' environmental rating and having an emission rate potential greater than 1 pound per hour are required to have a minimum of 99% control. Organic emissions in amounts of less than 1 pound per hour consist of aniline, o-toluidine, xylene and other trace HAPs.

An Air Guide-1 analysis of hydroquinone emissions indicates potential impacts at 110% of the AGC of 4.8 ug/m³. The actual annual impact is 0.34 % of the AGC. The actual aniline impact is at 10.5% of the AGC and potential at 11.21% of the AGC of 0.6 ug/m³. o-Toluidine actual and potential impacts are at .17% of the AGC (21 ug/m³). Potential impacts will be restricted by the 3450 batch annual production limit on which the actual impacts are based.

The operational efficiency of the baghouse will be demonstrated through monitoring of the pressure drop at the established range and maintainance of the equipment in accordance with the facility preventative maintenance program.

Parameter Monitored: 1,4-BENZENEDIOL

Lower Permit Limit: 99 percent reduction

Monitoring Frequency: PER SHIFT

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 25: Compliance Demonstration
Effective between the dates of 06/15/2009 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 229.3 (e) (2) (iv)

Item 25.1:

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00151

Facility DEC ID: 9291100036



The Compliance Demonstration activity will be performed for:

Emission Unit: U-F0101

Regulated Contaminant(s):

CAS No: 000095-47-6 BENZENE,1,2-DIMETHYL

Item 25.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The o-xylene storage tank identified as F0101 and having a capacity of 10,469 gallons is required to be equipped with submerged fill.

The facility shall keep records of the dimension of the storage tank and an analysis showing the capacity of the tank. These records shall be kept on-site for the life of the vessel and made available to Department representatives on request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 26: Compliance Demonstration

Effective between the dates of 06/15/2009 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 229.3 (e) (2) (iv)

Item 26.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-F0112

Regulated Contaminant(s):

CAS No: 001300-73-8 BENZENAMINE,AR,AR-DIMETHYL- C8H11N

Item 26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This mixed xylydine storage tank identified as F0112 and having a capacity of 15,351 gallons (Start-up 1968) is required to be equipped with submerged fill.

The facility shall keep records of the dimension of the storage tank and an analysis showing the capacity of the tank. These records shall be kept on-site for the life of the vessel and made available to Department



representatives on request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 27: Compliance Demonstration
Effective between the dates of 06/15/2009 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.10 (c) (4) (i)

Item 27.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: W-STWTR Emission Point: 0C2E0
Process: AIR

Regulated Contaminant(s):
CAS No: 000095-47-6 BENZENE,1,2-DIMETHYL

Item 27.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The facility, as a major source of volatile organic compounds (VOC) as of June 1, 1995, is subject to the Reasonable Available Control Technology (RACT) requirements of 6NYCRR, Part 212.10. RACT is required for those sources having an emission rate potential (ERP) greater than 3 pounds per hour. This emission source associated with emission point 0C2E0, with an ERP of 5.08 pounds per hour of xylene is required by 212.10(c)(4)(i) to have a minimum overall control efficiency of 81 percent.

The air stripper removes o-xylene from the wastewater. Xylene emissions are then vented through the Calgon carbon cannister which is expected to have a control efficiency of 95 percent. The carbon bed on the air stripper discharge will be monitored each month to determine if a changeout of the carbon cannister is required. A combustion gas meter will be used to monitor for the lower explosive limit (LEL) of o-xylene. Replacement of the carbon bed is required within 24 hours when the reading is at 10% of the LEL. The LEL for o-xylene (1,2-Dimethylbenzene) is 1.1%.

Records shall be kept noting the date of each monthly reading and the VOC level detected along with the date of the carbon replacement. Records shall be kept on-site for





STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.



Condition 29: Contaminant List

Effective between the dates of 06/15/2009 and Permit Expiration Date

Applicable State Requirement:ECL 19-0301

Item 29.1:

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

CAS No: 000062-53-3

Name: ANILINE

CAS No: 000095-47-6

Name: BENZENE,1,2-DIMETHYL

CAS No: 000095-53-4

Name: BENZENAMINE, 2-METHYL

CAS No: 000108-95-2

Name: PHENOL

CAS No: 000122-39-4

Name: BENZENAMINE, N-PHENYL

CAS No: 000123-31-9

Name: 1,4-BENZENEDIOL

CAS No: 001300-73-8

Name: BENZENAMINE,AR,AR-DIMETHYL- C8H11N

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY100-00-0

Name: HAP

CAS No: 0NY998-00-0

Name: VOC

Condition 1-3: Unavoidable noncompliance and violations

Effective between the dates of 12/07/2009 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-1.4

Item 1-3.1:

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



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

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

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

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

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

Condition 31: Emission Unit Definition
Effective between the dates of 06/15/2009 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 31.1(From Mod 2):

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

Emission Unit: U-000N3

Emission Unit Description:



A drum flaker, remelt tank, and centrifuge are vented through the water based Tri-mer scrubber and then to atmosphere through emission point 000N3.

Building(s): 32

Item 31.2(From Mod 2):

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

Emission Unit: U-32034

Emission Unit Description:

Antioxidant batches are degassed and then filtered (Sparkler filter) to remove the neutralized catalyst. The filter is cleaned periodically and fumes from the filter cake are removed by a ventilation system (EP 32034). The filter is used for Nailax when the centrifuge is down and for all AZ and Polystay 200.

Building(s): 32

Item 31.3(From Mod 0):

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

Emission Unit: 0-ANIST

Emission Unit Description:

Aniline is unloaded from tank trucks or rail cars into temperature controlled atmospheric storage tanks. As the air is displaced during unloading, aniline is removed by an activated carbon unit. The tanks are identified as F0106 and F0109 with each having a capacity of 15,900 gallons. Each tank has a dedicated carbon unit.

Building(s): 35

Item 31.4(From Mod 0):

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

Emission Unit: 0-RECYC

Emission Unit Description:

A mixture of o-Xylene, Aniline, o-Toluidine, Phenol, Diphenylamines(DPA) and mixed Xylidines is stored in an atmospheric tank. The tank is filled and emptied as required to balance production. There are three recycle tanks located in building 35: F0103, F0104, and F0107.

Building(s): 35

Item 31.5(From Mod 0):

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

Emission Unit: 0-TOLST

Emission Unit Description:

o-Toluidine is unloaded from tank trucks or rail cars into a temperature controlled atmospheric storage tank. There are two 15,928 gallon storage tanks identified as F0108 and F0110.



Building(s): 35

Item 31.6(From Mod 0):

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

Emission Unit: U-000D1

Emission Unit Description:

The elimination tank system provides overflow protection and additional condensing prior to emission to the atmosphere. The elimination tank system has two parallel systems for capturing liquid overflow and vapor from the antioxidant production process. Elimination tank # 1(Process ETA) serves the product holding tank vents. Elimination tank # 2 (Process ETB) serves various raw material, recycle, and reactor system vents. The parallel systems enhance the ability of the facility to recover and recycle materials. Each tanks vents to dedicated emission points identified as 000D1 and 000D2.

Emissions from the pastille unit are also directed to elimination tank #1.

Building(s): 32

Item 31.7(From Mod 0):

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

Emission Unit: U-000N2

Emission Unit Description:

Product dust from the packaging area and material from the "liquid" drumming station are exhausted through a dust collector and then to atmosphere thru emission point 000N2.

Building(s): 33

Item 31.8(From Mod 0):

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

Emission Unit: U-000N4

Emission Unit Description:

Product dust is exhausted from a 90-foot vibratory conveyor and bucket elevator through a pulse jet type dust collector and then to the atmosphere thru emission point 000N4. Emissions of organics are negligible.

Building(s): 32

Item 31.9(From Mod 0):

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

Emission Unit: U-32009

Emission Unit Description:

Water that is used to flush the reactor and degasser is held in the sump holding tank prior to discharge. The tank is vented to atmosphere through emission point 32009.



The tank exhausts trace emissions of aniline, phenol, o-toluidine and hydroquinone. This emission unit also includes the neutralization solution (sodium bicarbonate) make-up tank system which is vented to emission point 32017.

Building(s): 32

Item 31.10(From Mod 0):

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

Emission Unit: U-3393A

Emission Unit Description:

Hydroquinone (HQ) is discharged from bulk bags through a chute into a tank. The HQ dust from the dumping operation is removed by the dust collector station where HQ is separated from air. This exhaust also vents pumps during maintenance activities and a vacuum cleaning system for residual HQ.

Building(s): 33

Item 31.11(From Mod 0):

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

Emission Unit: U-F0101

Emission Unit Description:

o-Xylene is unloaded from tank truck into an uninsulated atmospheric storage vessel of 10,400 gallons. Air is displaced during the unloading operation.

Building(s): 35

Item 31.12(From Mod 0):

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

Emission Unit: U-F0112

Emission Unit Description:

Mixed xylydines are unloaded into a temperature controlled atmospheric 15,400 gallon storage tank from tank trucks or tank cars. Air is displaced during the unloading operation and through normal breathing of the tank

Building(s): 35

Item 31.13(From Mod 0):

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

Emission Unit: W-STWTR

Emission Unit Description:

Wastewater is transferred to a storage tank where solvent is used to extract organics (emission point F1862). Xylene is subsequently recovered by distillation. o-Xylene is stripped from the wastewater stream by air in a eight-inch diameter, twenty-foot long packed extraction column



(emission point 0C2E0).

Building(s): C-2

Condition 2-8: Visible Emissions Limited
Effective between the dates of 04/21/2011 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Item 2-8.1:

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.

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

Condition 33: Emission Point Definition By Emission Unit
Effective between the dates of 06/15/2009 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 33.1(From Mod 2):

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

Emission Unit: U-000N3

Emission Point: 000N3

Height (ft.): 80

Diameter (in.): 24

NYTMN (km.): 4778.02

NYTME (km.): 174.429

Building: 32

Item 33.2(From Mod 2):

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

Emission Unit: U-32034

Emission Point: 32034

Height (ft.): 55

Diameter (in.): 32

NYTMN (km.): 4778.02

NYTME (km.): 174.429

Building: 32

Item 33.3(From Mod 0):

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

Emission Unit: 0-ANIST

Emission Point: F0106

Height (ft.): 4 Diameter (in.): 2

NYTMN (km.): 4778.

NYTME (km.): 174.429

Building: 35

Emission Point: F0109

New York State Department of Environmental Conservation

Permit ID: 9-2911-00036/00151

Facility DEC ID: 9291100036



Height (ft.): 4 Diameter (in.): 2
NYTMN (km.): 4778. NYTME (km.): 174.4 Building: 35

Item 33.4(From Mod 0):

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

Emission Unit: 0-RECYC

Emission Point: F0103
Height (ft.): 8 Diameter (in.): 2
NYTMN (km.): 4778. NYTME (km.): 174.4 Building: 35

Emission Point: F0104
Height (ft.): 8 Diameter (in.): 2
NYTMN (km.): 4778. NYTME (km.): 174.4 Building: 35

Emission Point: F0107
Height (ft.): 2 Diameter (in.): 2
NYTMN (km.): 4778. NYTME (km.): 174.4 Building: 35

Item 33.5(From Mod 0):

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

Emission Unit: 0-TOLST

Emission Point: F0108
Height (ft.): 14 Diameter (in.): 2
NYTMN (km.): 4778. NYTME (km.): 174.4 Building: 35

Emission Point: F0110
Height (ft.): 14 Diameter (in.): 2
NYTMN (km.): 4778. NYTME (km.): 174.4 Building: 35

Item 33.6(From Mod 0):

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

Emission Unit: U-000D1

Emission Point: 000D1
Height (ft.): 61 Diameter (in.): 11
NYTMN (km.): 4778.02 NYTME (km.): 174.429 Building: 32

Emission Point: 000D2
Height (ft.): 61 Diameter (in.): 10
NYTMN (km.): 4778.02 NYTME (km.): 174.429 Building: 32

Item 33.7(From Mod 0):

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

Emission Unit: U-000N2

Emission Point: 000N2



Height (ft.): 34 Diameter (in.): 18
NYTMN (km.): 4778.02 NYTME (km.): 174.429 Building: 33

Item 33.8(From Mod 0):

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

Emission Unit: U-000N4

Emission Point: 000N4
Height (ft.): 61 Length (in.): 11 Width (in.): 11
NYTMN (km.): 4778.02 NYTME (km.): 174.429 Building: 32

Item 33.9(From Mod 0):

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

Emission Unit: U-32009

Emission Point: 32009
Height (ft.): 51 Diameter (in.): 4
NYTMN (km.): 4778.02 NYTME (km.): 174.429 Building: 32

Emission Point: 32017
Height (ft.): 55 Diameter (in.): 30
NYTMN (km.): 4778.02 NYTME (km.): 174.429 Building: 32

Item 33.10(From Mod 0):

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

Emission Unit: U-3393A

Emission Point: 3393A
Height (ft.): 56 Diameter (in.): 22
NYTMN (km.): 4778.02 NYTME (km.): 174.429 Building: 33

Item 33.11(From Mod 0):

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

Emission Unit: U-F0101

Emission Point: F0101
Height (ft.): 28 Diameter (in.): 2
NYTMN (km.): 4778.196 NYTME (km.): 174.263 Building: 35

Item 33.12(From Mod 0):

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

Emission Unit: U-F0112

Emission Point: F0112
Height (ft.): 3 Diameter (in.): 3
NYTMN (km.): 4778.196 NYTME (km.): 174.263 Building: 35



Item 33.13(From Mod 0):

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

Emission Unit: W-STWTR

Emission Point: 0C2EO

Height (ft.): 11 Diameter (in.): 4
NYTMN (km.): 4778. NYTME (km.): 174.4 Building: C-2

Emission Point: F1862

Height (ft.): 30 Diameter (in.): 4
NYTMN (km.): 4778.02 NYTME (km.): 174.429 Building: C-2

Condition 34: Process Definition By Emission Unit
Effective between the dates of 06/15/2009 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 34.1(From Mod 2):

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

Emission Unit: U-000N3

Process: DFL Source Classification Code: 3-01-999-99

Process Description:

A drum flaker is used to flake the antioxidant. The remelt tank is used to rework the antioxidant. The centrifuge removes solids from the product. The control type for this process is a whirlwet continuous dust collector (scrubber) made by Tri-Mer company. Water is used to scrub the air stream.

Emission Source/Control: 0S0N3 - Control
Control Type: WET SCRUBBER

Emission Source/Control: 000N3 - Process

Emission Source/Control: CENTR - Process

Emission Source/Control: REMEL - Process

Item 34.2(From Mod 2):

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

Emission Unit: U-32034

Process: SFI Source Classification Code: 3-01-999-99

Process Description:

The sparkler filter operates only when the centrifuge is down. Emissions are generated when the filter is opened for approximately one hour. A large fan is used to evacuate the working area when opening the filter.

Emission Source/Control: 03034 - Process



Item 34.3(From Mod 0):

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

Emission Unit: 0-ANIST
Process: AST Source Classification Code: 4-07-036-20
Process Description:
Two aniline storage tanks. Emissions from unloading operations to conservation vents described as emission points F0106 and F0109.

Emission Source/Control: 0C106 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 0C109 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 0F106 - Process
Design Capacity: 15,900 gallons

Emission Source/Control: 0F109 - Process
Design Capacity: 15,900 gallons

Item 34.4(From Mod 0):

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

Emission Unit: 0-RECYC
Process: 107 Source Classification Code: 4-07-036-20
Process Description:
Recycle storage tank with a capacity of 15,900 gallons and identified as F0107. (Installation date 4/86)

Emission Source/Control: 0F107 - Process
Design Capacity: 15,900 gallons

Item 34.5(From Mod 0):

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

Emission Unit: 0-RECYC
Process: RST Source Classification Code: 4-07-036-20
Process Description:
Two 10,800 gallon recycle storage tanks located in Building 35 identified as tanks F0103 and F0104. (Installation date of December 1953.)

Emission Source/Control: 0F103 - Process
Design Capacity: 10,800 gallons

Emission Source/Control: 0F104 - Process
Design Capacity: 10,800 gallons

Item 34.6(From Mod 0):



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

Emission Unit: 0-TOLST
Process: TOL Source Classification Code: 4-07-036-20
Process Description: Two 15,928 gallon o-Toluidine storage tanks.

Emission Source/Control: 0F108 - Process
Design Capacity: 15,928 gallons

Emission Source/Control: 0F110 - Process
Design Capacity: 15,928 gallons

Item 34.7(From Mod 0):

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

Emission Unit: U-000D1
Process: ETA Source Classification Code: 4-07-036-20
Process Description:

Elimination tank # 1 serves the product holding tank vents and pastille unit. There are two outlet heat exchangers (condensers) connected in series.

Emission Source/Control: 0HXD1 - Control
Control Type: VAPOR RECOVERY SYS(INCL.
CONDENSERS,HOODING, OTHER ENCLOSURES)

Emission Source/Control: 000D1 - Process

Emission Source/Control: PASTI - Process

Item 34.8(From Mod 0):

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

Emission Unit: U-000D1
Process: ETB Source Classification Code: 4-07-036-20
Process Description:

Elimination tank # 2 serves various raw material premix, recycle, and reactor system vents. The parallel systems enhance the ability of the facility to recover and recycle materials.

Emission Source/Control: 0HXD2 - Control
Control Type: VAPOR RECOVERY SYS(INCL.
CONDENSERS,HOODING, OTHER ENCLOSURES)



Emission Source/Control: 000D2 - Process

Item 34.9(From Mod 0):

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

Emission Unit: U-000N2

Process: NPA

Source Classification Code: 3-01-999-99

Process Description:

The product is solidified on a drum flaker or a metal belt. The dust from the handling and packaging is removed with the dust collector system. Material from drumming of the "liquid" product is also exhausted through the dust collector.

Emission Source/Control: 0F0N1 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 0F0N2 - Process

Item 34.10(From Mod 0):

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

Emission Unit: U-000N4

Process: BEL

Source Classification Code: 3-01-999-99

Process Description:

A bucket elevator and vibrating conveyor move the flaked antioxidant.

Emission Source/Control: 0F0N4 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 000N4 - Process

Item 34.11(From Mod 0):

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

Emission Unit: U-32009

Process: NMR

Source Classification Code: 3-01-999-99

Process Description:

A neutralizer solution make-up using process water.

Emission Source/Control: 03017 - Process

Item 34.12(From Mod 0):

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

Emission Unit: U-32009

Process: SHT

Source Classification Code: 3-01-999-99

Process Description:

The water that is used to flush the reactor and degasser is retained in the sump holding tank prior to wastewater discharge. Water quality tests are performed while being



retained.

Emission Source/Control: 03009 - Process

Item 34.13(From Mod 0):

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

Emission Unit: U-3393A
Process: PTA Source Classification Code: 3-01-999-99

Process Description:
Hydroquinone is discharged from bulk bags through a chute into a tank, from two pumps during maintenance activities, and from a vacuum cleaning system for residual hq.

Emission Source/Control: 0F393 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 03393 - Process

Item 34.14(From Mod 0):

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

Emission Unit: U-F0101
Process: OXS Source Classification Code: 4-07-036-20

Process Description: o-xylene storage-10,400 gallon capacity.

Emission Source/Control: 0F101 - Process

Item 34.15(From Mod 0):

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

Emission Unit: U-F0112
Process: M12 Source Classification Code: 4-07-036-20

Process Description: Mixed xylydines 15,400 gallon storage tank.

Emission Source/Control: 0F112 - Process

Item 34.16(From Mod 0):

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

Emission Unit: W-STWTR
Process: AIR Source Classification Code: 4-07-036-20

Process Description: Air stripper removes Xylene from wastewater.

Emission Source/Control: 0CAEO - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 0C2EO - Process

Item 34.17(From Mod 0):

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



Emission Unit: W-STWTR

Process: TAN

Source Classification Code: 4-07-036-20

Process Description:

Wastewater is transferred to recovery storage tank 3107.
Solvent is used to extract organics from the wastewater.
The solvent is subsequently recovered by distillation.
Tanks 3103 and 3104 contain clean and dirty xylene. Tank
3113 is the decant tank. Two shell and tube heat
exchangers are joined together and exit emission point
F1862.

Emission Source/Control: 0HSX2 - Control

Control Type: TUBE AND SHELL CONDENSER

Emission Source/Control: 0HXS1 - Control

Control Type: TUBE AND SHELL CONDENSER

Emission Source/Control: 01862 - Process

Emission Source/Control: 1862A - Process

