

**Air Permit Review**

**Permit Issue Date: DRAFT**

**Region:** Raleigh Regional Office  
**County:** Granville  
**NC Facility ID:** 3900009  
**Inspector's Name:** Steven Carr  
**Date of Last Inspection:** 01/26/2010  
**Compliance Code:** 3 / Compliance - inspection

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>
<b>Applicant (Facility's Name):</b> Bridgestone-Bandag, LLC  <b>Facility Address:</b> Bridgestone-Bandag, LLC 505 West Industry Drive Oxford, NC 27565  <b>SIC:</b> 7534 / Tire Retreading And Repair Shops <b>NAICS:</b> 326212 / Tire Retreading  <b>Facility Classification: Before:</b> Title V <b>After:</b> Title V <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V			<b>SIP:</b> <b>NSPS:</b> <b>NESHAP:</b> <b>PSD:</b> <b>PSD Avoidance:</b> <b>NC Toxics:</b> <b>112(r):</b> <b>Other:</b>
<b>Contact Data</b>			<b>Application Data</b>
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<b>Application Number:</b> 3900009.09A <b>Date Received:</b> 11/16/2009 <b>Application Type:</b> Renewal <b>Application Schedule:</b> TV-Renewal <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 02889/T15 <b>Existing Permit Issue Date:</b> 08/31/2007 <b>Existing Permit Expiration Date:</b> 08/31/2010
Michael Young, CQE Quality Manager (919) 603-5229 505 West Industry Drive Oxford, NC 27565	Mark Averette Plant Manager (919) 603-5201 505 West Industry Drive Oxford, NC 27565	Paul Crosser Senior Analyst, Environment + Risk (563) 262-1368 2905 North Highway 61 Muscatine, IA 52761+5886	
<b>Review Engineer:</b> Kevin Godwin  <b>Review Engineer's Signature:</b> _____ <b>Date:</b> _____		<b>Comments / Recommendations:</b>	
		<b>Issue</b> 02889/T16 <b>Permit Issue Date:</b> <b>Permit Expiration Date:</b>	

**I. Introduction**

Bridgestone-Bandag produces pre-cure tread and other rubber products for tire re-treading. The facility supplies products for tire re-treading to dealers and does not re-tread tires. Emission sources include; rubber mixing, milling, extrusion, platen press curing, tread buffing, cementing, and packaging.

The application to renew the existing Title V Air Permit was received by the Division of Air Quality (DAQ) on November 16, 2009 and is currently covered by the Title V application shield. The Permittee has not proposed any changes to the existing Title V operating permit as part of the permit renewal process.

**II. Changes to Existing Title V Air Permit**

The following table provides a summary of changes made to existing Air Permit No. 02889T15:

Page No.	Section	Description of Change
Permit Cover Page	N/A	Updated text.
6, 9, and 11	2.1 B.2.d., C.2.c., and E.2.d.	Updated visible emissions monitoring requirement to most recent shell version (TVCOND63).

Page No.	Section	Description of Change
13	3	Updated General Conditions to most recent shell version (v3.2.2).

### III. Statement of Compliance

Bridgestone-Bandag was last inspected on January 26, 2010 by Mr. Steven Carr of the Raleigh Regional Office (RRO). According to Mr. Carr's inspection report, the facility appeared to be in compliance with the requirements of their Title V permit. Regarding the *five-year* compliance history, the following Notice of Violation (NOV) is documented in the inspection report:

May 24, 2006 - NOV for failing to meet certain monitoring, recordkeeping, and reporting requirements.

### IV. Review of Applicable Regulations

#### A. Two natural gas/No. 2 fuel oil-fired boilers (ID Nos. ES-1 and ES-2)

1. Applicable Regulatory Requirements
  - a. 15A NCAC 02D .0503
  - b. 15A NCAC 02D .0516
  - c. 15A NCAC 02D .0521(d)
2. No new applicable regulations apply to these boilers as part of this Title V permit renewal. No regulatory review is required at this time.

#### B. Banbury Mixers #1, #2, and #3 (ID Nos. ES-3, ES-4, and ES-5)

1. Applicable Regulatory Requirements
  - a. 15A NCAC 02D .0515
  - b. 15A NCAC 02D .0521(c) and (d)
2. No new applicable regulations apply to these banbury mixers as part of this Title V permit renewal. No regulatory review is required at this time.

#### C. Rubber buffing operations #1, #2, and #3 (ID Nos. ES-6, ES-7, and ES-8)

1. Applicable Regulatory Requirements
  - a. 15A NCAC 02D .0515
  - b. 15A NCAC 02D .0521(d)
2. No new applicable regulations apply to these buffing operations as part of this Title V permit renewal. No regulatory review is required at this time.

#### D. Finishing line roll coaters #1, #2, and #3 (ID Nos. ES-9A, ES-9B, and ES-9C) and cement mixing operation (ID No. ES-10)

1. Applicable Regulatory Requirements
  - a. 15A NCAC 02D .0958 (*facility-wide requirement*)
  - b. 15A NCAC 02D .1806 (*state-only requirement*)
2. No new applicable regulations apply to these roll coaters as part of this Title V permit renewal. No regulatory review is required at this time.

#### E. "A" Rubber Curing Press (ID No. ES-12), "B" Rubber Curing Press (ID No. ES-13), "A" Breakdown Mill (ID No. ES-15), "A" Blend Mill (ID No. ES-16); and No. 1 Banbury Drop Mill (ID No. ES-18)

1. Applicable Regulatory Requirements
  - a. 15A NCAC 02D .0515

- b. 15A NCAC 02D .0521(c) and (d)
  - c. 15A NCAC 02D .0958 (*facility-wide requirement*)
  - d. 15A NCAC 02D .1806 (*state-only requirement*)
2. No new applicable regulations apply to these sources as part of this Title V permit renewal. No regulatory review is required at this time.

**V. Compliance Assurance Monitoring (CAM)**

Pursuant to 40 CFR 64.2, the provisions of the CAM rule are applicable to emission units that meet all of the following criteria:

- Criteria #1; the unit is subject to an emissions limitation and uses a control device to achieve compliance with the limit,
- Criteria #2; the unit has pre-control potential emissions that are equal to or greater than 100% of the amount (in tpy) required for source to be classified as a major source (i.e. 100 tpy of any criteria pollutant or 10 tpy of any single HAP); and
- Criteria #3; the unit is not exempt under 40 CFR 64.2(b).

The renewal application provides documentation that all controlled sources have pre-control potential to emit less than 100% of the amount required for the source to be major. Therefore, all three of the above criteria are not met and CAM does not apply.

**VI. MACT Applicability**

No MACT standard applies to operations at the Bridgestone-Bandag facility.

**VII. Prevention of Significant Deterioration (PSD)**

Bridgestone-Bandag falls into the category of sources with a 250 tpy PSD major source threshold. Potential VOC emissions are 221 tpy. All other potential criteria pollutant emissions are less than the major source threshold. Therefore, Bridgestone-Bandag is a minor PSD source.

**VIII. Insignificant Activities**

NC DAQ confirmed that maximum emissions from the insignificant activities are less than 5 tpy of all regulated criteria pollutants and less than 1,000 lb/yr HAP. In addition, these sources do not require permitting under state-only TAP requirements under 15A NCAC 02Q .0711.

**IX. Actual Emissions**

The following are most recent actual criteria pollutant emissions as found in IBEAM Air Quality Emissions Inventory database:

	<u>2008</u>	<u>2007</u>
TSP	4.34 tons/yr	4.23 tons/yr
PM-10	4.34 tons/yr	4.23 tons/yr
SO <sub>2</sub>	0.02 tons/yr	0.02 tons/yr
NO <sub>x</sub>	2.70 tons/yr	2.50 tons/yr
VOC	121.98 tons/yr	124.67 tons/yr
CO	2.31 tons/yr	2.10 tons/yr

**X. Title V Permit History**

The following permit modifications have taken place since the last permit renewal:

02889T14	December 2, 2005	Administrative amendment to correct the required date for the second semi-annual report from March 1 to January 30
02889T15	August 31, 2007	Administrative amendment for ownership change

**XI. Other Regulatory Considerations**

- An application fee is not required for this renewal application.

- A zoning consistency determination is not required for this renewal application.
- A Professional Engineer's Seal is not required for this renewal application.
- According to the application, the facility is not subject to 112(r).
- The renewal application was signed by Mr. Mark S. Averette, Plant Manager, on November 13, 2009.
- IBEAM Emission Source Module (ESM) update was verified on September 21, 2010.

**XII. Draft/Proposed Permit Review Summary**

- Mr. Steven Carr (RRO) was provided a draft permit on September 16, 2010.
- Mr. Mark Averette (Bandag) was provided a draft permit on September 16, 2010.
- NCDAQ published a Public Notice of the proposed Title V permit renewal on .....
- US EPA Region 4 was provided a proposed Title V permit renewal on .....

**XIII. Recommendations**

This Title V Permit Renewal application for Bridgestone-Bandag, LLC has been reviewed by DAQ to determine compliance with all procedures and requirements. The DAQ has determined that this facility appears to be complying or is expected to achieve compliance as specified in the permit with all applicable requirements.

Issue P/N 02889 T16.