

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Fayetteville Regional Office
County: Cumberland
NC Facility ID: 2600050
Inspector's Name: Robert Kennedy
Date of Last Inspection: 07/07/2005
Compliance Code: C/In Compliance With
 Procedural Reqr

Facility Data			Permit Applicability (this application only)		
Applicant (Facility's Name): The Goodyear Tire & Rubber Company Facility Address: The Goodyear Tire & Rubber Company 6650 Ramsey Street Fayetteville, NC 28302 SIC: 3011 / Tires And Inner Tubes NAICS: 326211 / Tire Manufacturing (except Retreading) Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: 2D .0515, .0521 NSPS: 40 CFR 60, Subpart BBB NESHAP: 40 CFR 63, Subpart XXXX PSD: No PSD Avoidance: Yes NC Toxics: No 112(r): No Other: No		
Contact Data			Application Data		
Facility Contact	Authorized Contact	Technical Contact	Application Number: 2600050.05C Date Received: 09/15/2005 Application Type: Modification Application Schedule: TV-Significant Existing Permit Data Existing Permit Number: 00011/T27 Existing Permit Issue Date: 07/13/2005 Existing Permit Expiration Date: 11/30/2008		
Scott Peters Environmental Coordinator, FGA (910) 630-5678 6650 Ramsey Street Fayetteville NC, 28311	Gary Cushman Plant Manager (910) 630-5211 6650 Ramsey Street Fayetteville NC, 28311	Scott Peters Environmental Coordinator, FGA (910) 630-5678 6650 Ramsey Street Fayetteville NC, 28311			
Review Engineer: Fern Paterson Review Engineer's Signature: _____ Date: _____			Comments / Recommendations: Issue 00011/T28 Permit Issue Date: _____ Permit Expiration Date: _____		

I. Purpose of Application

Currently, The Goodyear Tire & Rubber Company (Goodyear) holds Title V Permit No. 00011T27 with an expiration date of November 30, 2008 for a tire manufacturing facility in Fayetteville, Cumberland County, North Carolina. On September 15, 2005, the Division of Air Quality (DAQ) received an Air Quality Permit Application (Application No. 2600050.05C) to make a significant modification to the existing Title V permit pursuant to the procedures provided in 15A NCAC 2D .0500 [i.e., a "Part II" significant modification pursuant to 15A NCAC 2D .0501(d)(2)]. This significant permit modification is specifically required to allow the Permittee to take credit for VOC emissions control achieved through the use of a new RTO (**ID No. RTO-1**) when determining compliance with a PSD Avoidance limitation pursuant to 15A NCAC 2Q .0317. The Permittee was authorized to construct the RTO in Permit Revision No. 00011T27. In addition to the RTO (**ID No. RTO-1**), all equipment that has been authorized for construction, replacement, or modification by various non-significant permit modifications since the initial Title V issuance in December 2003 are listed in Table 1. All listed equipment will be incorporated into to Title V permit shield as part of this permit action.

Table 1. Equipment Authorized for Construction, Replacement, or Modification Since the Initial Title V Permit (Permit No. 00011T21, Issued December 2003).

Source ID No.	Source Description	Activity Authorized	Permit Modification Type	Permit Revision No.
ME69 (FG-405)	One force-grinder	Construction and Operation	502(b)(10) change	00011T22
IGTS (CP-311 to CP-320)	Ten tire curing presses	Construction and Operation	Minor Modification; 15 A NCAC 2Q .0515	00011T24
ME69 (FG-404, FG-405)	Two force-grinders	Relocation to ID No. AE71	Minor Modification; 15 A NCAC 2Q .0515	00011T24
ME69 (FG-404)	Relocation to ID No. AE71	Construction and Operation	Minor Modification; 15 A NCAC 2Q .0515	00011T24
AE71 (RG-500 to RG-503)	Four run-out grinders	Construction and Operation	Minor Modification; 15 A NCAC 2Q .0515	00011T24
AE71 (RG-5040 and RG-505)	Two run-out grinders	Relocation from ID No. ME69	Minor Modification; 15 A NCAC 2Q .0515	00011T24
DE71 (RG-600 to RG-605)	Six run-out grinders	Construction and Operation	Minor Modification; 15 A NCAC 2Q .0515	00011T24
KE60	One mold cleaner	Replacement	502(b)(10) change	00011T25
DC-12	One bagfilter for ID No. PDS-2	Modification – increase airflow	502(b)(10) change	00011T26
CAL1	Once four-roll calendar process	Modification – add electric beam process	502(b)(10) change	00011T26
KE63 (SG-308)	One white sidewall grinder	Construction and Operation	502(b)(10) change	00011T27
DE71 (RG-606)	One run-out grinder	Construction and Operation	502(b)(10) change	00011T27
LE61	One mold cleaner	Construction and Operation	502(b)(10) change	00011T27
DC-95	One bagfilter for ID No. LE61	Construction and Operation	502(b)(10) change	00011T27
ITGS (CP-321 and CP-322)	Two tire curing presses	Construction and Operation	502(b)(10) change	00011T27
ITGS (CP-182 to CP-191)	Ten tire curing presses	Replacement	502(b)(10) change	00011T27
ITGS (CP-153 and CP-154)	Two tire curing presses	Replacement	502(b)(10) change	00011T27
RTO-1	One regenerative thermal oxidizer for ID Nos. K9-1, L9-1, and V9-1	Construction	Significant modification; 15A NCAC 2Q .0501(d)(2)	00011T27

Additional information associated with the sources listed above, including complete regulatory reviews, may be found in permit review documents associated with the listed permit revisions.

II. Permit Modifications/Changes

The following table describes the modifications to the current permit.

Old Page(s)	New Page(s)	Section	Description of Change(s)
Cover	Cover	-	Amend permit revision numbers and issuance/effective/expiration/renewal dates.
Page 4	Page 4	Sec. 1, Table	Remove asterisks from the RTO (ID No. RTO-1) associated with Banbury mixer #2 (ID No. K9-1).
Page 5	Page 5	Sec. 1, Table	Remove asterisks from the RTO (ID No. RTO-1) associated with Banbury mixer #2 (ID No. L9-1).
Page 6	Page 6	Sec. 1, Table	Remove asterisks from the RTO (ID No. RTO-1) associated with Banbury mixer #2 (ID No. V9-1).
Page 7	Page 7	Sec. 1, Table	Remove asterisks from the four-roll calendar process (ID No. CAL1).
Page 8	Page 8	Sec. 1, Table	- Remove asterisks from tire presses and simplify emission source description (ID Nos. CP-01 through CP-322). - Remove asterisks from the mold cleaner (ID No. LE61) and associated bagfilter (ID No. DC-95).
Page 9	Page 9	Sec. 1, Table	- Remove asterisks from the run-out grinder in the Force Grinder Operation Bank #6 (ID No. DE71; RG-606). - Remove table footnotes regarding Title V permit shield applicability
Page 11	Pages 11-12	Sec. 2.1 A.3. e.	- Remove language regarding the requirement to establish “normal” visible emission for the affected sources. “Normal” visible emissions should already be established. - Add option to take corrective action in the event of observing visible emissions above “normal” and add allowance for 3 days of absent observations per semiannual period.
Pages 12-13	Pages 12-13	Sec. 2.1 A.4. c.-d.	Correct condition numbering to be consistent with permit template.
Page 16	Page 16	Sec. 2.1 B.2. c.	Add allowance for 3 days of absent observations per semiannual period.
Page 37	Page 17	Sec. 2.1 B.3. c.-d.	Move testing requirement for the RTO (ID No. RTO-1) from Part II of the permit (Conditions 5 & 6) to Section 2.1 B.3. No substantive changes are made to the requirement.
Page 18	Page 18	Sec. 2.1 B.3. e.	Remove note from calculation methodology indicating the credit from emissions control from the RTO (ID No. RTO-1) may not be used in the calculation until a Title V permit modification is obtained.
Page 37	Pages 19-20	Sec. 2.1 C.1. e.	Move notification requirements for the replacement tire curing presses (ID Nos. CP-153, CP-154, CP-182 through CP-191, CP-321, and CP-322) from Part II of the permit (Condition 4) to Section 2.1 C.1. No substantive changes are made to the requirement.
Pages 25-33	Pages 25-32	Sec. 3, General Conditions	Update the permit with the most recent NC DAQ General Conditions. [NOTE: Compliance Certification date changed from January 30 th to March 1 st of each year. Changes to Condition I.B.]
Pages 35-38	N/A	Part II	Remove Part II of the permit.

III. Statement of Compliance

The DAQ has reviewed the compliance status of this facility. On its latest inspection, conducted on July 7, 2005 by Mr. Robert Kennedy and Mr. Jim Moser of the Fayetteville Regional Office (FRO), the facility was found to be in compliance with all applicable requirements. The DAQ anticipates that the new emission sources authorized for construction in this permit will be in compliance with all applicable requirements upon commencement of operation, as detailed in the following regulatory review.

IV. Continuous Assurance Monitoring

Pursuant to 40 CFR 64.5(a)(2), emissions units affected by a significant Title V permit modification must be evaluated for applicability under the Compliance Assurance Monitoring (CAM) requirements provided in 40 CFR Part 64. The application for a significant modification (Application No. 2600050.05B) requests authorization to install an add-on control device (**ID No. RTO-1**) at the banbury mixers #1, #2, and #6A (**ID Nos. K9-1, L9-1, and V9-1**) to control VOC emissions. The CAM requirements are applicable to large Pollutant-Specific Emissions Units (PSEUs), or emission units with the potential to emit greater than 100 tpy of a regulated air pollutant, with add-on pollution controls used to comply with an emission standard. None of the affected banbury mixers qualify as a large PSEU. Therefore CAM does not apply.

VIII. Permit History:

The following list provides a very brief summary of Title V permit revisions for this facility:

<u>Permit No.</u>	<u>Issuance Date</u>	<u>Description of Revision</u>
00011T21	December 2003	Initial Title V permit.
00011T22	January 2004	Authorizes the construction and operation of a new force grinder (ID No. ME69).
00011T23	March 2004	Administrative amendment to correct typographical errors, revise source description language, and revise NSPS, Subpart BBB language.
00011T24	May 2004	Minor modification to add one force grinder (ID No. FG-404), ten run-out grinders (ID Nos. RG-500 to RG-505, RG-600 to RG-605), and ten curing presses (ID Nos. CP-311 to CP-320).
00011T25	August 2004	Authorizes the construction and operation of a replacement mold cleaner (ID No. KE60).
00011T26	March 2005	Permit to increase the airflow through a bagfilter (ID No. DC-12) from 12,600 acfm to 20,000 acfm and to install an electronic beam process unit at the existing four-roll calendar operation (ID No. CAL1). The affected bagfilter controls PM emissions from the Banbury mixer and dump sinks (ID No. PDS-2).
00011T26	July 2005	(1) Significant permit modification [Part I pursuant to 15A NCAC 2Q .0501(d)(2)] to authorize the installation of a regenerative thermal oxidizer (RTO) (ID No. RTO-1) at banbury mixers #1, #2, and #6A (ID Nos. K9-1, L9-1, and V9-1); and, (2) A 502(b)(1) permit change to authorize the construction of a white sidewall grinder (ID No. KE63; grinder no. SG-308), a run-out grinder (ID No. DE71; grinder no. RG-606), a mold cleaner (ID No. LE61) and associated bagfilter (ID No. DC-95), and two new curing presses with presses designed for 52-inch tire diameters on the 2200 row (ID No. ITGS; press nos. CP-321 and CP-322) and authorize the replacement of ten existing curing presses on the 1300 row (ID No. ITGS; press nos. CP-182 through CP-191) and two existing curing presses on the 2100 row (ID No. ITGS; press nos. CP-153 and CP-154) with presses designed for 52-inch tire diameters.

VII. Other Regulatory Considerations

- The required application fee of \$834 was received on September 15, 2005.
- A 30-day public notice period is required for this application.
- The application and proposed permit must be provided to U.S. EPA, Region 4 for review.

VIII. Recommendations

The permit modification applications for The Goodyear Tire and Rubber Company of Fayetteville, Cumberland County, North Carolina have been reviewed by NC DAQ to determine compliance with all procedures and requirements. NC DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources.

Issue Permit No. 00011T28.