

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: **date, 2009**

Region: Fayetteville Regional Office
County: Cumberland
NC Facility ID: 2600050
Inspector's Name: Robert Kennedy
Date of Last Inspection: 07/17/2008
Compliance Code: 3/In Compliance - Inspection

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: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 2600050.08A Date Received: 02/26/2008 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 00011/T36 Existing Permit Issue Date: 06/02/2008 Existing Permit Expiration Date: 11/30/2008
Carole Wilbert Environmental Coordinator, FGA 6650 Ramsey Street Fayetteville NC, 28311	Tim Frosell Plant Manager (910) 630-5211 6650 Ramsey Street Fayetteville NC, 28311	Carole Wilbert Environmental Coordinator, FGA 6650 Ramsey Street Fayetteville NC, 28311	
Review Engineer: Mark Cuilla Review Engineer's Signature: Date: date, 2009		Comments / Recommendations: Issue 00011/T37 Permit Issue Date: date, 2009 Permit Expiration Date: date, 2013	

I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**00011T36**) was issued on **June 2, 2008**, and is currently scheduled to expire on **November 30, 2008**. The renewal application was received on **February 26, 2008**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

II. Facility Description

The facility is rubber tire manufacturer.

III. History/Background/Application Chronology

February 26, 2008 – Permit application **2600050.08A** was received for the renewal of the current Title V permit.

June 2, 2008 – Permit **00011T36** issued as a major modification under the Prevention of Significant Deterioration (PSD) permitting program.

June 23, 2008 – Received FRO air permit application review from Robert Kennedy.

July 17, 2008 – FRO completed annual compliance inspection of the facility. Robert Kennedy noted in his report that *“Based on the observations made during the July 17 inspection and documents received at FRO since then, the facility appeared to be in compliance with all requirements outlined in air permit 00011T36. For the second year in a row, the facility has made great progress in cleaning the roof and the equipment on the roof.”*

October 17, 2008 – DRAFT permit sent to Permittee, Regional Office, Title V Coordinator for comment prior to public notice and EPA review.

date, 2008 – DRAFT sent to 30-day public notice and 45-day EPA review prior to issuance.

IV. Permit Modifications/Changes

The following table describes the modifications to the current permit as part of the renewal process.

Page	Section	Description of Change
Cover	-	-amended all dates and permit revision numbers
TOC	-	-added reference to Section 2.3 Permit Shield for Non-applicable Requirements
All	Header	-amended permit revision number
3-9	Equipment Table	-added MACT Subpart designations for applicable equipment -added NSPS asterisk language for applicable equipment
10	2.1 A.1.a 2.1 A.1.b 2.1 A.1.c	-added ID Nos. -updated shell language -added ID Nos.
11	2.1 A.2.a 2.1 A.2.b 2.1 A.2.c 2.1 A.2.d 2.1 A.2.f 2.1 A.3.a 2.1 A.3.b	-added ID Nos. -updated shell language -added ID Nos. -added ID Nos. -added “no reporting” language for firing of natural gas and No. 2 fuel oil -updated shell language -updated shell language
12	2.1 A.3.c 2.1 A.3.d 2.1 A.3.e 2.1 A.3.g	-updated shell language -added ID Nos. -added ID Nos. and updated shell language -added “no reporting” language for firing of natural gas and No. 2 fuel oil

Page	Section	Description of Change
13	2.1 A.4.b 2.1 A.4.c 2.1 A.4.e	-updated shell language -updated shell language -updated shell language
14	2.1 B.1.b 2.1 B.1.c	-updated shell language -added ID Nos.
15	2.1 B.2.b 2.1 B.2.c 2.1 B.3.b 2.1 B.3.c	-updated shell language -added ID Nos. -updated shell language -added ID Nos.
16	2.1 B.4.d 2.1 B.4.e 2.1 B.4.f	-cross reference correction -cross reference correction -cross reference correction
17	2.1 B.4.g 2.1 B.4.h 2.1 B.5 2.1 B.5.d	-cross reference correction -cross reference correction -rule citation correction -updated shell language
18	2.1 B.5.h	-updated shell language
19-20	2.1 C	-edited equipment description where needed
21	2.1 C (table) 2.1 C.1.a 2.1 C.1.b	-corrected ID Nos. where needed -added ID Nos. -updated shell language
22	2.1 C.1.c 2.1 C.1.d 2.1 C.1.e 2.1 C.1.f	-added ID Nos. and updated shell language -updated shell language -added reporting requirements for control device maintenance -updated shell language
23	2.1 C.2.a 2.1 C.2.b 2.1 C.2.c	-added ID Nos. -updated shell language -added ID Nos. and updated shell language
24	2.1 C.2.e	-updated shell language
24	2.1 D (table) 2.1 D.1 2.1 D.1.b 2.1 D.1.c	-added ID Nos. where needed -corrected rule citation -added ID Nos. -added ID Nos.
25	2.1 D.1.d 2.1 D.1.e 2.1 D.1.f	-added ID Nos. -added ID Nos. -added ID Nos.
26	2.2 A (table)	-added reference to 2D .1111 (MACT)
27	2.2 A.1.c 2.2 A.1.e	-updated shell language -updated shell language
28	2.2 A.4	-updated shell language
32	2.2 B 2.2 B.1.a 2.2 B.1.b 2.2 B.1.d 2.2 B.1.e	-edited equipment description to corrected ID Nos. -added ID Nos. -added ID Nos. -updated shell language -updated shell language
33	2.2 B.1.h	-updated shell language
33-35	2.3	-added Section for non-applicable requirements
36-45	General Conditions	-updated shell conditions (v2.22.1)

V. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 2D .0503, Particulates from Fuel Burning Indirect Heat Exchangers
15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes
15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources
15A NCAC 2D .0521, Control of Visible Emissions
15A NCAC 2D .0524, New Source Performance Standards (40 CFR 60, Subparts Dc and BBB)
15A NCAC 2D .0530, Prevention of Significant Deterioration
15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds
15A NCAC 2D .1100, Control of Toxic Air Pollutants
15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart XXXX)
15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions
15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .1100 and 2D .0530)
15A NCAC 2Q .0705, Existing Facilities and SIC Calls
15A NCAC 2Q .0711, Toxic Air Pollutant Emissions Limitation Requirement

A regulatory review for the existing sources will not be included in this document.

The following condition was added to the permit as part of this renewal:

15A NCAC 2D .0614, Compliance Assurance Monitoring

VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The facility is subject to two New Source Performance Standards as follows:

1. Subpart Dc – This Subpart applies to the temporary natural gas/No. 2 fuel oil fired boiler (**ID No. TMP01**). The facility is permitted to operate one temporary boiler with a maximum heat input capacity less than 100 million Btu per hour. These standards are only applicable to temporary, back-up boilers that commenced construction, reconstruction, or modification after June 9, 1989 and have a maximum heat input capacity equal to or greater than 10 million Btu per hour. The source is restricted to a maximum sulfur content of less than 0.5% by weight for any fuel oil received and fired and, for each boiler with a heat input rating of 30 million Btu or more, to less than 20% opacity. This permit renewal does not affect this status.
2. Subpart BBB – This Subpart applies to the 322 tire curing presses (**ID Nos. GTS-CP-01 through GTS-CP-322**), five tire/mold release lube spray operations (**ID Nos. GTS-GT-S1 through GTS-GT-S5**), and six cementing rubber extrusion lines (**ID Nos. TL02, 03, 04, 06, 10, and 11**). The curing presses and spray operations are limited to less than 1.2 grams of VOC per tire cemented for each month and the extrusion lines are limited to less than 10 grams VOC per tire cemented for each month. This permit renewal does not affect this status.

NESHAPS/MACT – The facility is subject to the National Emission Standards for Hazardous Air Pollutants for Tire Manufacturing (40 CFR 63, Subpart XXXX). This Subpart applies to the collection of all processes that use or process cements and solvents as defined in 40 CFR 63.6015. The Permittee has elected to comply with the Subpart using the “Purchase Alternative” for total cements and solvents. These requirements are already included in the permit as Section 2.2 A.5. This permit renewal does not affect this status.

PSD – Three of the facility’s Banbury mixers (**ID Nos. BB01-K9-1, BB02-L9-1, and BB06A-V9-1**) and 322 tire curing presses (**ID Nos. GTS-CP-01 through GTS-CP-322**) are subject to a PSD emission limit of 13.2 pounds of VOCs per ton of rubber compound processed resulting from the use of coupling agents. The Permittee shall control VOC emissions from the affected sources (except tire presses) using a regenerative thermal oxidizer (**ID No. RTO-1**). VOC emissions from the tire presses shall be controlled by utilizing best work practices. This permit renewal does not affect this status.

112(r) – The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule. This permit renewal does not affect this status.

CAM – 40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. The following table shows the emission source/control device relationships for this facility:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
CBT1-ES-210	One Carbon black tower 1 railcar bucket elevator	DC-120	bin vent filter
CBT1-ES-211 through CBT1-ES-216	Six Carbon Black Tower 1 storage bins	DC-121 through DC-126	Six bin vent filters
CBT1-CBS-1	One Banbury #1 surge bin	DC-140 through DC-143	Four bin vent filters
CBT1-CBS-2	One Banbury #2 surge bin	DC-144 through DC-147	Four bin vent filters
CBT1-CBS-3	One Banbury #3 surge bin	DC-148 through 151	Four bin vent filters
CBT1-CBS-6A	One Banbury #6a surge bin	DC-152 through DC-155	Four bin vent filters
CBT2-ES-220	One Carbon black tower 2 railcar bucket elevator	DC-130	bin vent filter
CBT2-ES-221 through CBT2-ES-226	Six Carbon Black Tower 2 storage bins	DC-131 through DC-136	Six bin vent filters
CBT2-CBS-7	One Banbury #7 surge bin	DC-156 through DC-159	Four bin vent filters
CBT2-CBS-8	One Banbury #8 surge bin	DC-160 through DC-164	Five bin vent filters

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
BO01	Blend room operations including: -One bailer (No. E10-1), -One weigh hopper (No. E10-2), and -Two mixers (Nos. E10-4 and E10-5)	DC-10	Bagfilter
BO02	One Pellet Feed System Operation consisting of the following equipment: -Seven rubber pellet material systems (Nos. PFS1, PFS2, PFS3, PFS4, PFS5, PFS6, and PFS6A) for seven Banbury mixers (Nos. K9-1, L9-1, M9-1, P9-1, Q9-1, R9-1, and V9-1, respectively) -One rubber pellet material feed system for Banbury mixer #7 (No. AE8-3)	DC-22, DC-23, DC-24, DC-25, DC-26, DC-27, and DC-28 DC-29	Seven bagfilters Bagfilter
BB01-K9-1	Banbury Mixer #1	DC-13 RTO-1	Bagfilter Regenerative thermal oxidizer
BB01-K11B-1	Pellet Cooler – Process #1	DC-108	Dust collector/cyclone
BB01-K11B-2	Pellet Cooler – Process #1	DC-109	Dust collector/cyclone
BB01-K-12	Pellet Loader – Process #1	DC-110	Dust collector/bagfilter
BB02-L9-1	Banbury Mixer #2	DC-14 RTO-1	Bagfilter Regenerative thermal oxidizer
BB02-L11B-1	Pellet Cooler – Process #2	DC-111	Dust collector/cyclone
BB02-L11B-2	Pellet Cooler – Process #2	DC-112	Dust collector/cyclone
BB02-L-12	Pellet Loader – Process #2	DC-110	Dust collector/bagfilter
BB03-M9-1	Banbury Mixer #3	DC-15	Bagfilter
BB04-P9-1	Banbury Mixer #4	DC-16	Bagfilter
BB05-Q9-1	Banbury Mixer #5	DC-17	Bagfilter
BB06-R9-1	Banbury Mixer #6	DC-18	Bagfilter
BB06A-V9-1	Banbury Mixer #6A	DC-19 RTO-1	Bagfilter Regenerative thermal oxidizer
BB07-AE8-1	Banbury Mixer #7	DC-20	Bagfilter
BB07-AE11B-1	Pellet Cooler – Process #7	DC-113	Dust collector/cyclone
BB07-AE11B-2	Pellet Cooler – Process #7	DC-114	Dust collector/cyclone
BB07-AE-12	Pellet Loader – Process #7	DC-115	Dust collector/bagfilter
BB08-CE8-1	Banbury Mixer #8	DC-21	Bagfilter
BB08-CE11B-1	Pellet Cooler – Process #8	DC-116	Dust collector/cyclone
BB08-CE11B-2	Pellet Cooler – Process #8	DC-117	Dust collector/cyclone
BB08-CE-12	Pellet Loader – Process #8	DC-115	Dust collector/bagfilter
K8-1 K8-2	Slurry Mixers 1 and 2	DC-100	One bagfilter
BE7-1 BE7-2	Slurry Mixers 3 and 4	DC-21	One bagfilter

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
PDS-1	Banbury Mixer Nos. 1, 2, and 3 dump sinks	DC-11	One bagfilter
PDS-2	Banbury Mixer Nos. 4, 5, 6, 6A, and 7 dump sinks	DC-12	One bagfilter
FABR-G18	Fabric Calendar Process - line vacuum	DC-103	One bagfilter
FABR-G25	Fabric Calendar Process - windup process	DC-104	One dust collector/cyclone
EPB-W27	Wire Calendar Process – windup	DC-106	One dust collector/cyclone
KE60	One mold cleaner	DC-93	One bagfilter
LE60	One mold cleaner	DC-94	One bagfilter
LE61	One mold cleaner	DC-95	One bagfilter
Q64	White Sidewall Grinders Operation Bank #1 - Sidewall Grinders SG-101 through SG-105, SG-201 through SG-206	DC-31	One self-induced spray scrubber
P63	White Sidewall Grinders Operation Bank #1 - Sidewall Grinder SG-106	DC-31	One self-induced spray scrubber
HE63	White Sidewall Grinders Operation Bank #2 - Sidewall Grinders SG-300 through SG-306	DC-42	One self-induced spray scrubber
KE63	White Sidewall Grinders Operation Bank #2 - Sidewall Grinders SG-307 and SG-308	DC-42	One self-induced spray scrubber
Q66	Force Grinders FG-101 through FG-109 and FG-201 through FG-208	DC-48	One self-induced spray scrubber
WX66	Force Grinders FG-209 through FG-215 and FG-301 through FG-304	DC-65	One self-induced spray scrubber
FE66	Force Grinders FG-305 through FG-315	DC-77	One self-induced spray scrubber
ME69	Force Grinders FG-401 through FG-404	DC-165	One rotoclone
AE71	Run-Out Grinders RG-500 through RG-503	DC-166	One rotoclone
DE71	Five (5) Run-Out Grinders RG-600 through RG-606	DC-167	One rotoclone
UE70	Run-Out Grinders RG-700 and RG-704	DC-168	One rotoclone
TR01-F67 TR01-F69	Tire Repair Tables 2 and 3	DC-91	One dust cyclone
TR01-AE63	Tire Repair Table 4	DC-31	One self-induced spray scrubber

Each piece of equipment and its corresponding control device(s) is described in Section 2.1 C of the permit. Specific regulations associated with this equipment are:

1. 15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes. The Permittee is required to limit particulate matter emissions from each source according to an emission calculation based on process weight amounts. To ensure compliance with these limits, the Permittee is required to control emissions from each source as described above. Monthly and annual inspection and maintenance requirements are listed in the permit. Particulate matter (PM₁₀) is a criteria pollutant. The Permittee estimates potential pre-control particulate emissions from these sources with the use of AP-42 factors and potential throughputs. Specifically AP-42, Table 11.12-2 (January 1995) and Table 13.2-4(August 2004). It should be noted that each of these AP-42 Sections have been updated since the versions used to estimate emissions as part of this CAM determination. The Permittee explains the use of these specific tables as *“the historical AP-42 references were used because the bucket elevator emission factor was not incorporated into the updated version. The method of transfer in the updated version (June 2006) is limited to pneumatic transfers. The transfers at the Fayetteville facility are bucket elevators. Therefore, the older version was used as the emission factor is more representative of Fayetteville operations.”* In reference to the use of the Section of AP-42 that deals with cement manufacturing, the Permittee explains *“Similar to other Goodyear facilities, the cement emission factor was used as the most accurate representation of carbon black.”* These explanations are deemed appropriate for the use of these older Sections. With the use of appropriate applicable emission factors, the Permittee has demonstrated that all particulate matter sources are less than the major source threshold for CAM applicability. Therefore CAM will not be included in the renewed permit and Section 2.3, Permit Shield for Non-applicable Requirements will be added.
2. 15A NCAC 2D .0521, Control of Visible Emissions. Visible emissions are not a criteria pollutant; therefore a CAM analysis is not needed for this regulation as part of this renewal.
3. 15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds. While VOCs are a criteria pollutant, this regulation is not emissions based but requires work practice standards. Therefore a CAM analysis is not needed for this regulation as part of this renewal.
4. 15A NCAC 2D .0530, Prevention of Significant Deterioration (ID Nos. BB01-K9-1, BB02-L9-1, and BB06A-V9-1 only). These sources are subject to Best Available Control Technology standards for VOCs. Specifically, VOC emissions resulting from the use of a coupling agent in these sources shall not exceed 13.2 pounds per ton of rubber compound processed. To ensure compliance with this emission limit, the Permittee is required to operate a regenerative thermal oxidizer under specific conditions listed in the permit. The Permittee estimates potential pre-control VOC emissions at 341.46 tons per year per source. This assumes a potential coupling agent throughput of 2,710,000 pounds per year with a VOC emission factor of 0.242 lbs VOC per pound of coupling agent (emission factor as supplied by Permittee and approved by DAQ in the PSD permit application). Section 2.2 B.1.g requires the Permittee to install, operate, and maintain a continuous monitoring system (CMS) to measure and record the combustion chamber temperature of the RTO. This requirement exempts the emission limit or standard from the requirements of CAM applicability per 40 CFR 64.2 (b)(1)(vi). Therefore a CAM analysis is not needed for this regulation as part of this renewal. The renewed permit includes a permit shield for non-applicable requirements addressing this exemption.
5. 15A NCAC 2D .1100, Control of Toxic Air Pollutants. NC Air Toxics is not a criteria pollutant; therefore a CAM analysis is not needed for this regulation as part of this renewal.

6. 15A NCAC 2D .1806, Control of Odorous Emissions. Odor is not a criteria pollutant; therefore a CAM analysis is not needed for this regulation as part of this renewal.
7. 15A NCAC 2Q .0711, Toxic Air Pollutant Emissions Limitation Requirement. NC Air Toxics is not a criteria pollutant; therefore a CAM analysis is not needed for this regulation as part of this renewal.
8. 15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart XXXX). As indicated above, these sources are subject to the MACT standard for rubber tire manufacturing. 64.2(b)(1)(i) exempts from CAM applicability “any emission limitation or standard proposed by the Administrator after November 15, 1990 pursuant to Section 111 or 112 of the Act.” Therefore, a CAM analysis is not needed for this regulation as part of this renewal.
9. 15A NCAC 2Q .0705, Existing Facilities and SIC Calls. NC Air Toxics is not a criteria pollutant; therefore a CAM analysis is not needed for this regulation as part of this renewal.

VII. Facility Wide Air Toxics

1. The facility’s four natural gas/No. 6 fuel oil/No. 2 fuel oil/recycled No. 6 fuel oil-fired boilers (**ID Nos. BL01 through BL04**) are subject to a NC Air Toxics Avoidance condition per 15A NCAC 2Q .0317. The Permittee is avoiding the applicability of 15A NCAC 2Q .0700 by using recycled fuels which are equivalent to their virgin counterparts. Specific requirements for the recycled No. 6 fuel oil include allowable constituent levels and testing, monitoring, recordkeeping, and reporting requirements. This permit renewal does not affect the status of these requirements.
2. The facility is subject to facility-wide modeled emissions rates per 15A NCAC 2D .1100 for the following NC Air Toxics:
 - 1,3-butadiene;
 - Acrolein;
 - Acrylonitrile;
 - Aniline;
 - Benzene;
 - Cadmium;
 - Carbon disulfide;
 - n-hexane;
 - Methylene chloride;
 - Nickel metal;
 - 4-methyl-2-pentanone (MIBK);
 - di(2-ethylhexyl)phthalate;
 - o-xylene, m-xylene, and p-xylene; and
 - toluene.

In addition, the facility’s four natural gas/No. 6 fuel oil/No. 2 fuel oil/recycled No. 6 fuel oil-fired boilers (**ID Nos. BL01 through BL04**) and two natural gas-fired inert gas generators (**ID Nos. B53 and D53**) are subject to modeled emission rates for the following NC Air Toxics:

- Arsenic;
- Chromium VI;
- Manganese;
- Beryllium;
- Formaldehyde; and
- Mercury.

To ensure compliance with these limits the Permittee shall not exceed 768 million pounds of rubber production per consecutive 12-month period. The Permittee shall also keep records demonstrating that this production limit has not been exceeded. This permit renewal does not affect the status of these requirements.

3. The Permittee has made a demonstration that the following NC Air Toxics do not exceed their respective Toxic Permit Emission Rate (TPER): acetaldehyde, Benzo(a)pyrene, carbon tetrachloride, 1,4-dichlorobenzene, dichlorodifluoromethane, ethylene dichloride, methyl ethyl ketone, phenol, and styrene. This permit renewal does not affect the status of these requirements.

4. As of **February 2003** as revised **November 19, 2007**, emissions of toxic air pollutants have been demonstrated on a facility-wide basis (excluding those sources exempt under 15A NCAC 2D .0702, Exemptions) that each of the TAPs emitted from all sources at the facility are either below its respective TPER or the TAPs are in compliance with modeled emission rates per 15A NCAC 2Q .0705. The applicability of 15A NCAC 2Q .0705 is the result of a last MACT becoming applicable to the facility. This permit renewal does not affect the status of these requirements.

VIII. Facility Emissions Review

The following table represents the latest years emission inventory from the facility:

Pollutant(s)	2006 Actual Emissions (tpy)	2007 Actual Emissions (tpy)
CO	28.34	33.05
NO _x	85.71	78.75
PM ₁₀	22.22	17.64
SO ₂	349.55	265.39
VOC	185.17	256.7
Total HAP/TAP	22.07	27.11

IX. Stipulation Review

Based on the inspection history, as documented by Bob Kennedy of the FRO, the facility has experienced excessive emissions of particulate matter from equipment on the roof. Therefore, FRO has the following recommendations for changing permit stipulations:

1. Adding the two carbon black conveying (distribution) systems to the permit as emission sources in Section 2.1 C, with VE monitoring once a week while operating, recordkeeping, and semiannual summary reporting. *Agree; sources will be added as suggested.*
2. Increasing the frequency of the VE monitoring of the particulate emission sources in Section 2.1 C.2.d from once a month to once a week. *Agree; monitoring period will be modified from monthly to weekly.*
3. Changing the maximum time frame for taking appropriate action to correct an above normal VE situation from within the monitoring period to within 24 hours, Section 2.1 C.2.d.i. *Disagree, both the action to correct and compliance are based on the established monitoring period. In this case, the Permittee will be required to take appropriate action within the "week".*

The Permittee had the following comments on the draft permit as presented prior to the public notice and EPA review period:

1. The emission source table lists multiple sources subject to MACT Subpart XXXX. Although the MACT applies to the tire manufacturing facility, the requirements are generally limited to cements and solvents. For example, identifying equipment such as a carbon black tower as subject to the MACT, while correct, does not reflect the requirements for the MACT standard. Is it possible to insert a facility-wide MACT condition in lieu of identifying each piece of equipment? *(FRO has noted that it is okay with either scenario). The draft permit will remain as is. The applicable pieces of equipment subject to the MACT have been identified. The permit requirements are explicitly listed in Section 2.2 A.5 and do identify the cements and glues as the “applicable” processes with emission limits. ESM also requires that MACT identifiers be listed on a piece-by-piece level as illustrated in the source table.*
2. Goodyear has requested that the frequency of visible emissions monitoring for the RTO be changed from daily to weekly. The RTO is a VOC control device and there have been no visible emissions concerns from this unit. Furthermore, Goodyear requests that the sources subject to weekly monitoring be reduced to monthly. All sources monitored monthly will remain monthly, except for carbon black emissions from the mixing operations that will be weekly. *(FRO is okay with changing the frequency to weekly but is against changing to monthly in the near future based on recent compliance issues). The draft permit will be modified as per FRO’s recommendations.*
3. Goodyear has revised the CAM plan to align with the three-hour average monitoring required by the Title V permit and have included a QIP threshold as none was included previously. *(FRO is okay with this). The CAM plan has been removed from the draft permit. See Section VI of this Document above for a discussion.*
4. Goodyear requests that the temperature limit for the RTO be changed from 1630 degrees to “the temperature established during the most recent approved performance test.” This will allow Goodyear to operate at a lower temperature without revising the title V permit. Additionally, Goodyear requests that an alternative operating condition be included to allow for operating at a lower temperature to conduct a performance test. This would allow Goodyear to demonstrate compliance at a lower temperature while still complying with the title V permit and not resulting in an excursion for CAM. *(FRO requests that a “hard number” remain in the permit for compliance inspectors and the facility to be on the same page. We recently discussed this same scenario with Unilin and Joe Voelker. FRO supports adding a stipulation to allow RTO testing at lower temperatures and energy savings. The Unilin allowed testing after protocol submittal along with an estimate of hours below the permitted limit at targeted temperatures for the test.) The permit will remain as drafted. The current temperature setting will remain as requested. In addition, the request to modify the permit to add alternative monitoring and testing language is beyond the scope of this permit renewal. If the Permittee wishes to test at a lower temperature, it must submit the proper testing protocol, involve FRO in the testing, and submit the final results as a permit modification prior to operating at the different temperature. It should be noted that DAQ is currently drafting a General Condition which when approved will allow for these short term testing scenarios as long as specific conditions are met. However, until this is finalized the current permit will remain in force.*

X. Public Notice/EPA and Affected State(s) Review

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. There are no affected areas within 50 miles of the facility.

XI. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

FRO recommends issuance of the permit and **was presented** with a DRAFT permit prior to notice and issuance (See History Section of this Document for a listing of dates).

RCO concurs with FRO's recommendation to issue the renewed air permit