

**OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

MEMORANDUM

October 27, 2022

TO: Phillip Fielder, P.E., Chief Engineer

THROUGH: Rick Groshong, Sr. Environmental Manager, Compliance & Enforcement

THROUGH: Eric L. Milligan, P.E., Engineering Manager, Engineering Section

THROUGH: Jian Yue, P.E., New Source Permits Section

FROM: Joseph K. Wills, P.E., Engineering Section

SUBJECT: Evaluation of Permit Application No. **2011-0440-C (M-16) PSD**
The Goodyear Tire & Rubber Company
Goodyear Lawton
Facility ID: 662
Section 36, Township 2N, Range 13W, Comanche County, Oklahoma
Latitude: 34.59984°N; Longitude: 98.51215°W
Directions: From I-44 near Lawton, OK, take the Lee Boulevard exit.
Proceed west on Lee Boulevard to the intersection with Goodyear
Boulevard. The facility is on the northwest corner of the intersection.

SECTION I. INTRODUCTION

The Goodyear Tire & Rubber Company (Goodyear) applied for a PSD construction permit for the significant modification of the Goodyear Lawton facility. The facility is currently operating under Permit No. 2011-0440-TVR (M-12), issued on April 23, 2021. The facility is a rubber tire manufacturing plant (SIC 3011, NAICS 326211) and is located in an attainment area. The facility is a major source for Prevention of Significant Deterioration (PSD) and a major source of Hazardous Air Pollutants (HAPs). The applicant requested that the permit be processed through the “traditional NSR process” which requires a public review opportunity for a period of 30-days.

SECTION II. REQUESTED CHANGES

Goodyear has requested the authorization for a series of upgrades proposed to take place at the Goodyear Lawton facility. These upgrades include the installation and removal of the following equipment:

Equipment to be Installed (new construction):

- Twenty-two (22) VMI Maxx Tire Building Machines (TBMs),
- Two (2) HF PLT2 SD TBMs,
- Eleven (11) VMI Apexers (for VMI TBMs),
- One (1) Ermafa Apexer (for HF TBMs),

- Two (2) slitters,
- One (1) ply cutter,
- Three (3) green tire spray lines, and
- Fifty-two (52) Harburg-Freudenberger curing presses.

Equipment to be Removed (retired):

- Twenty-three (23) ARF TBMs,
- Eight (8) G3 TBMs,
- Three (3) green tire spray lines, and
- Sixty-four (64) curing presses from Rows 700-1000.

The proposed project will result in a PSD construction permit requiring BACT review and air quality analyses. This permit action will establish specific conditions from the BACT analysis for each of the new equipment items and will establish a new facility-wide VOC emissions limit cap of 627 TPY which is a reduction from the current Title V operating permit facility-wide emission limit caps of 744.34 TPY for VOC (excluding ethanol) and 657.08 TPY for ethanol or a total VOC cap of 1401.42. The new facility-wide emission cap is the projected actual emissions represented in the PSD applicability analysis.

SECTION III. FACILITY DESCRIPTION

Manufacturing tires requires the use of various types and formulations of rubber compounds. The formulation of ingredients depends on a number of factors including the desired rubber properties and performance characteristics. Formulation differences and changes are driven by the specific function of the compound being evaluated within the tire (tread, belt, ply, sidewall, bead, inner liner, etc.). These items impact desired properties such as tire wear, cornering traction, heat buildup, rolling resistance, fuel economy, stopping distance, and wet traction. The production of a tire involves the following basic steps:

- A compounder determines desired rubber formulations for various tire components based on customer requirements.
- Various raw materials needed to produce the required compounds are combined in a process known as “Banbury mixing.”
- Emissions from the Banbury mixers consist of particulate matter and VOCs. Mixing air emissions are ducted to high efficiency dust collectors for particulate removal. After that, the emissions are ducted to Regenerative Thermal Oxidizers (RTOs) for destruction of VOCs.
- The mixed rubber is then extruded or calendered into components, which are used to build a “green,” or uncured, tire. Tread striping and end cementing can occur as part of the extrusion process.
- The uncured rubber components manufactured in the mixing, extrusion, and calendering process are assembled at a tire building machine.
- Assembled uncured (“green”) tires are transported to the curing area, where the inside of the “green” tire is sprayed with a release compound in the Green Tire Spray Booth (GTSB) and then cured in a curing press under heat and pressure.

- The cured tires are then transported to final finish, which is the final step in the manufacturing process. At this step, Goodyear personnel inspects each tire to ensure compliance with quality and customer specification. Likewise, tires may also be subject to grinding by Force Variation Machines (FVMs) as well as white sidewall grinding to ensure compliance with specifications and uniformity requirements. Dust collectors remove particulate matter from the final finish emissions.

SECTION IV. PROJECT DESCRIPTION

A. Project Overview

As discussed previously, Goodyear has requested authorization for a series of upgrades proposed to take place at the Goodyear Lawton facility. A summary of the new affected units is tabulated as follows:

Proposed Emissions Sources			
EUG ID	EU ID	POINT ID	EU Name/Model
EUG-GTSNSPS	PL-05	79HW	Backup spray booth #1 (Manual)
	PLT-01	80KZ	Green tire paint tank
	PLT-02	80KZ	Green tire paint tank
	SPR01	82MK	Green tire spray booth #6 (Automatic) ⁽¹⁾
	SPR02	82KZ	Green tire spray booth #5 (Automatic) ⁽¹⁾
	SPR03	82HW	Green tire spray booth #4 (Automatic) ⁽¹⁾
EUG CP	CP07	88-95ZS	26 additional curing presses – Trench #7 (700/800 rows) ⁽²⁾
	CP06	88-95BY	26 additional curing presses – Trench #6 (900/1000 rows) ⁽²⁾
EUG-AP	AP01	57K	Apex Extruder #1 (2.75” extruder)
	AP02	58K	Apex Extruder #2 (2.75” extruder)
	AP03	60K	Apex Extruder #3 (2.75” extruder)
	AP04	61K	Apex Extruder #4 (2.75” extruder)
	AP05	63HW	Apex Extruder #5 (2.75” extruder)
	AP06	64HW	Apex Extruder #6 (2.75” extruder)
	AP07	65HW	Apex Extruder #7 (2.75” extruder)
	AP08	66HW	Apex Extruder #8 (2.75” extruder)
	AP09	62SX2	Apex Extruder #9 (2.75” extruder)
	AP10	63SX2	Apex Extruder #10 (2.75” extruder)
	AP11	66SX2	Apex Extruder #11 (2.75” extruder)
	AP12	58BZN	Apex Extruder #12 (3.5” extruder)

⁽¹⁾ The proposed equipment will replace an existing automatic green tire spray booth currently permitted under the same EU ID.
⁽²⁾ The proposed equipment will replace 32 existing curing presses currently permitted under the same EU ID.

In addition to the proposed changes above, Goodyear Lawton’s mixing, extrusion, calendaring, and boilers will experience associated changes in throughput and emissions as a result of this

project. Facility-wide emissions increases of VOC, CO, PM₁₀, PM_{2.5}, NO_x, SO₂, and GHG are expected as a result of this project.

Of the proposed equipment, installation of the fifty-two (52) curing presses, twelve (12) apexers, and three (3) green tire spray lines will result in an increase in emissions. The project increases are calculated based on either the changes in rubber throughput processes (e.g., curing presses and apexers) and emission factors from the United States Tire Manufacturers Association (USTMA) or on chemical application of machines (e.g., GTSB utilizing green tire spray) and MSDS emissions contents.

Emissions from the TBM, slitter, and ply cutter equipment are negligible and are considered zero. Therefore, these types of equipment are not considered further.

While Goodyear does not anticipate an increase in the facility-wide total rubber throughput, it is conservatively assumed that the additional curing capacity will result in an associated emissions increase from upstream emissions sources. The calculated associated emissions increase is a result of the change in rubber throughput through the mixing, extruding, and calendaring equipment as well as increased utilization of the boilers. Additional green tire spray lines installed as part of this project will not cause associated emissions increases from the existing green tire spray lines.

B. Project Aggregation/Separation

This project should not be associated with any previously permitted changes or applications which are currently under review for the Goodyear Lawton facility. On March 8, 2022, Goodyear provided documentation to DEQ demonstrating the applications assigned as Permits No. 2011-0440-TVR (M-11) and 2011-0440-TVR (M-13) were part of distinct capital and engineering planning cycles. These applications currently under review related to the installation of sixteen (16) curing presses on the 500-600 rows.

The proposed modification relates to the purchase and installation of several key pieces of equipment at Goodyear Lawton meant to modernize Goodyear Lawton's tire building capabilities, install additional equipment to accommodate the new TBMs, and replace aging curing presses. Goodyear capital planning teams authorized the project's budget on May 2022 in a separate Engineering Order (EO) with completely separate engineering and construction schedules than the previous projects. The project documentation also includes separate analyses related to project funding; line-item costs for specific construction requirements; environmental, health, and safety considerations; and accounting implications. Further, the funding related to this project was not anticipated or included in long-term capital expenditure plans previously submitted by Goodyear to DEQ.

SECTION V. PSD APPLICABILITY ANALYSIS

PSD review is required for projects that are major modifications at PSD major sources. Under OAC 252:100-8-30(b)(1), a project is considered a major modification for a regulated NSR pollutant if it causes two types of emission increases: a significant emissions increase and a significant net emissions increase.

There are two steps to a PSD applicability assessment. First, a determination is conducted to identify whether the project emission increase (PEI) is a significant emission increase (SEI). If the PEI is determined to be a SEI, then a second determination whether the project's net emission increase (NEI) is a significant net emissions increase (SNEI). Under OAC 252:100-31, "significant" is defined as a rate of emissions that would equal or exceed any defined significant emission rates (SER). The PSD evaluation is completed on a pollutant-by-pollutant basis.

OAC 252:100-8-30(b)(3) through (6) describe test methods for determining if significant emission increases or a significant net emission increase have occurred.

*(3) **Actual-to-projected-actual applicability test for projects that only involve existing emissions units.** A significant emissions increase of a regulated NSR pollutant is projected to occur if the sum of the difference between the projected actual emissions and the baseline actual emissions for each existing emissions unit, equals or exceeds the amount that is significant for that pollutant.*

*(4) **Actual-to-potential test for projects that only involve construction of a new emissions unit(s).** A significant emissions increase of a regulated NSR pollutant is projected to occur if the sum of the difference between the potential to emit from each new emissions unit following completion of the project and the baseline actual emissions of these units before the project equals or exceeds the amount that is significant for that pollutant.*

*(5) **Hybrid test for projects that involve multiple types of emission units.** A significant emissions increase of a regulated NSR pollutant is projected to occur if the sum of the emission increases for each emissions unit, using the method specified in OAC 252:100-8-30(b)(3) or (4) as applicable with respect to each emissions unit, for each type of emissions unit equals or exceeds the amount that is significant for that pollutant. [For example, if a project involves both an existing emissions unit and a new emissions unit, the project increase is determined by summing the value determined using the method specified in OAC 252:100-8-30(b)(3) for the existing unit and the value determined using the method specified in OAC 252:100-8-30(b)(4) for the new emissions unit.]*

*(6) **Actual-to-potential test for projects that only involve existing emissions units.** In lieu of using the actual-to-projected-actual test, owners or operators may choose to use the actual-to-potential test to determine if a significant emissions increase of a regulated NSR pollutant will result from a proposed project. A significant emissions increase of a regulated NSR pollutant will occur if the sum of the difference between the potential emissions and the baseline actual emissions for each existing emissions unit, equals or exceeds the amount that is significant for that pollutant. Owners or operators who use the actual to potential test will not be subject to the recordkeeping requirements in OAC 252:100-8-36.2(c).*

Goodyear used the actual-to-potential test as described in OAC 252:100-8-30(b)(4) for the new emissions units. Goodyear has chosen to use the actual-to-projected actual test described in OAC 252:100-8-30(b)(3) for the project associated emission units.

A. Baseline Actual Emissions

Per OAC 252:100-8-31, the definition of baseline actual means the rate of emission, in TPY, of a regulated NSR pollutant, as determined in accordance with paragraphs (A) through (E) of that definition.

Under paragraph (C) of the definition of baseline actual emissions, for an existing emissions unit, baseline actual emissions means the average rate in TPY at which the emission unit actually emitted a pollutant during any consecutive 24-month period selected by the owner or operator within the 10-year period immediately preceding the project. Under paragraph (C)(iv), projects with multiple emissions units must use the same 24-month averaging period for a given pollutant but may use a different 24-month averaging period for different pollutants. For the existing associated emissions units related to this project, Goodyear selected January 2013 to December 2014 for the baseline period for PM₁₀; January 2014 to December 2015 for VOC; January 2015 to December 2016 for SO₂; and January 2016 to December 2017 for NO_x, CO, and PM_{2.5}.

Under paragraph (D) of the definition of baseline actual emissions, for a new emissions unit, the baseline actual emissions shall be equal to zero.

The baseline actual emissions tabulated as follows cover the entirety of the Goodyear Lawton facility, not just the air emissions units included as associated emissions for this project. The baseline actual emissions in the following table are annual rates in TPY, which are calculated using rolling 12-month summation of monthly total values.

Baseline Actual Emissions

Unit/Process	16'-17'	16'-17'	14'-15'	16'-17'	13'-14'	15'-16'
	Emissions (TPY)					
	NO _x	CO	VOC ⁽¹⁾	PM _{2.5}	PM ₁₀	SO ₂
Boiler#1 (Babcock and Wilcox)	25.863	11.376	0.413	1.031	0.766	0.037
Boiler#2 (Babcock and Wilcox)	40.644	17.877	0.640	1.617	1.457	0.111
Oil Fired Boiler (Keeler)	10.329	8.105	1.117	0.735	0.795	0.110
Carbon Black Handling	--	--	--	--	0.048	--
Rubber Mixing	--	--	89.752	--	1.541	--
Curing	--	--	192.467	--	--	--
Extruding	--	--	54.375	--	--	--
Calendaring	--	--	22.601	--	--	--
White Sidewall Grinding	--	--	0.371	--	0.028	--
Rubber Force Grinding	--	--	0.397	--	1.610	--
Mattuezzi Grinders	--	--	0.397	--	1.610	--
Ozone Rubber Component Treatment	--	--	0.836	--	--	--
#2 Fuel Oil Tank	--	--	0.006	--	--	--
TF 1 (Process Oil) Tank	--	--	0.372	--	--	--
TF 2 (Aromatic Oil) Tank	--	--	< 0.001	--	--	--
TF 3 (Petroleum Distillate) Tank	--	--	0.001	--	--	--
TF 4 (Zonflax) Tank	--	--	< 0.001	--	--	--

Unit/Process	16'-17'	16'-17'	14'-15'	16'-17'	13'-14'	15'-16'
	Emissions (TPY)					
	NO _x	CO	VOC ⁽¹⁾	PM _{2.5}	PM ₁₀	SO ₂
TF 5 (Cherline) Tank	--	--	0.005	--	--	--
TF 6 (Lube Oil) Tank	--	--	< 0.001	--	--	--
TF 7 (Silane Coupler) Tank	--	--	< 0.001	--	--	--
Fixed Roof Tank - #2 Fuel Oil and Gasoline	--	--	0.608	--	--	--
Fixed Roof Tank - #6 Fuel Oil	--	--	< 0.001	--	--	--
Fixed Roof Tank – Used Oil Horizontal 1	--	--	< 0.001	--	--	--
Fixed Roof Tank – Used Oil Horizontal 2	--	--	< 0.001	--	--	--
Fixed Roof Tank – Used Oil Vertical	--	--	< 0.001	--	--	--
Green Tire Stripping	--	--	1.350	--	--	--
Green Tire Lining Cement	--	--	0.024	--	--	--
Plant Fugitives	--	--	46.074	--	--	--
NPTE Paint Booth	--	--	< 0.001	--	--	--
Marley Cooling Tower	--	--	--	--	6.642	--
PSI Cooling Tower	--	--	--	--	0.063	--
Curing Cooling Tower	--	--	--	--	0.055	--
BAC Cooling Tower	--	--	--	--	--	--
RTO #1	1.500	1.260	0.022	0.114	0.041	0.007
RTO #2	1.623	1.346	0.089	0.123	0.124	0.060
Warehouse Heaters (4 units)	0.266	0.223	0.022	0.020	0.021	0.002
EFP-2 (EFP-5 beginning in 2017)	0.036	0.007	0.006	0.002	0.005	0.005
EFP-3	< 0.001	<0.001	0.013	< 0.001	0.025	0.009
EFP-4 (EFP-8 beginning in 2017)	0.130	0.028	0.015	0.009	0.012	0.012
EFP-5 (Replaced by EFP-8 in 2017)	0.007	0.001	< 0.001	< 0.001	< 0.001	0.003
EFP-6	0.025	0.004	< 0.001	0.001	< 0.001	0.004
EFP-7 (EFP-1)	0.063	0.006	0.022	0.002	0.003	0.012
Material Recovery	--	--	2.477	--	--	--
Parking Lot Lights	5.095	1.098	--	0.359	--	--
TOTALS	80.484	40.231	414.465	3.652	15.276	0.370

⁽¹⁾ Total VOC (includes ethanol).

B. Project Emissions Increases

The potential emissions from the new equipment associated with the proposed project are summarized in the table following and documented thereafter.

Emissions Units	VOC (TPY)	PM _{10/2.5} (TPY)
52 Harburg-Freudenberger Curing Presses	113.95	--
3 Green Tire Spray Booths	3.34	--
12 Apexers	2.44	0.01
Totals	119.73	0.01

1. Curing Presses

Potential emission increases from the new curing presses are based on manufacturer data, maximum expected increase in productive rubber, and emission factors from USTMA. The potential rubber throughput is considered confidential business information. The potential emissions from coupling agent usage at the curing presses are based on manufacturer provided data for the coupling agent.

Curing Press Potential Emissions

Pollutant	Process	Emission Factor (lb VOC/lb rubber)	PTE (lb/yr)	PTE (TPY)
VOC	Curing Emissions	3.37E-04 ⁽¹⁾	48,355.73	24.18
VOC	Coupling Agent Usage Emissions	-- ⁽²⁾	179,547.54 ⁽³⁾	89.77
Totals			227,903.26	113.95

- (1) Based on USTMA emission factor (1999) for Tire A rubber.
- (2) Based on manufacturer provided data for the silane coupling agent. This information is considered proprietary and confidential business information.
- (3) Emissions from the coupling agent due to mixing (75%) are included in associated emission calculations for mixing.

2. Green Tire Spray Booths

Potential emission increases from the new green tire spray booths are based on a maximum tire throughput per booth, the applicant rate of the green tires spray, and manufacturer provided data of the green tires spray. The potential tire throughput and green tire spray application rate are considered confidential business information.

Green Tire Spray Booth Potential Emissions

Pollutant	Emission Factor ⁽¹⁾ (lb VOC/1,000 green tires)	PTE (TPY)
VOC	0.353	3.34

- (1) Green tire spray is conservatively assumed to have a 1% VOC content per vendor certification letter which states "<1".

3. Apexers

Potential emission increases from the new apexers are based on a maximum annual rubber capacity of 94,520,400 lbs of rubber per year for the twelve apexers and the maximum emission factor for Compound #5 from AP-42 Section 4.12 (11/08) and from USTMA extruding emission factors from 1999 for Compounds #4 and #6.

Apexer Potential Emissions

Pollutant	Total Max. Ann. Throughput (lb rubber per year)	Emission Factor (lb VOC/lb rubber)	PTE (TPY)
VOC	94,520,400	5.15E-05	2.436
PM _{10/2.5}	94,520,400	1.12E-07	0.005

4. Associated Emissions Increases

Goodyear Lawton’s mixing, extrusion, calendaring, and boiler usage will experience associated changes in throughput and emissions as a part of this project. Unless noted otherwise in the tables below, associated emission increases from each source are calculated by multiplying the 2020 actual annual emissions by the ratio of the potential rubber throughput and actual annual rubber throughput. Past emissions and the expected associated emission increases from these units are presented in the following tables.

2020 Actual Emissions for Associated Emissions Units

Process	NO_x (TPY)	CO (TPY)	VOC (TPY)	PM_{10/2.5} (TPY)	SO₂ (TPY)	CO_{2e} (TPY)
Extrusion	--	--	20.40	0.0050	--	--
Calendering	--	--	20.26	--	--	--
Boilers	67.5	32.66	2.14	2.96	0.23	46,657.14
Total	67.65	32.66	42.80	2.97	0.23	46,657.14

Associated Emissions Increases

Process	NO_x (TPY)	CO (TPY)	VOC⁽¹⁾ (TPY)	PM_{10/2.5} (TPY)	SO₂ (TPY)	CO_{2e} (TPY)
Mixing ⁽²⁾	--	--	15.44	0.66	--	--
Mixing Coupling Agent ⁽³⁾	--	--	47.62	--	--	--
Extrusion	--	--	8.19	0.0020	--	--
Calendering	--	--	20.62	--	--	--
Boilers ⁽⁴⁾	27.16	13.11	0.86	1.19	0.09	18,733.50
Total	27.16	13.11	92.73	1.85	0.09	18,733.50

⁽¹⁾ Total VOC (includes ethanol).

⁽²⁾ Associated potential emissions from mixing are based on the worst-case USTMA emission factor and the potential rubber throughput of the new curing presses. PM emissions are controlled by a dust collector with 99% efficiency.

⁽³⁾ Associated potential emissions from mixing the coupling agent are based on various factors such as rubber throughput increase with coupling agent, coupling agent maximum usage rate, percent VOC emissions from mixing, RTO mixing capture efficiency, RTO combustion efficiency, and a VOC emission factor for the coupling agent. Several of these factors are considered confidential business information.

⁽⁴⁾ Annual rubber throughput was assumed equal to extrusion rubber throughput for the purpose of calculated associate emissions increases; because it is assumed the boilers operate when rubber is being extruded.

5. Consideration of Startup/Shutdown/Malfunction Emissions

PSD evaluations must include the consideration of startup/shutdown/malfunction (SSM) emissions to the extent they are quantifiable. There are not quantifiable emissions associated with SSM resulting from the proposed project.

Emissions Increases

	NO_x (TPY)	CO (TPY)	VOC (TPY)	PM_{10/2.5} (TPY)	SO₂ (TPY)	CO_{2e} (TPY)
New Curing Presses	--	--	113.95	--	--	--
Green Tire Spray Booths	--	--	3.34	--	--	--
Apexers	--	--	2.44	0.01	--	--
Associated Emissions Increases	27.16	13.11	92.73	1.85	0.09	18,733.50
Total	27.16	13.11	212.46	1.86	0.09	18,733.50

C. Significant Emissions Increase Analyses (Step 1)

The proposed project, including associated emissions increases, will result in increases of VOC, CO, PM₁₀, PM_{2.5}, NO_x, SO₂, and GHG emissions. The results of the SEI analysis are tabulated as follows.

Significant Emissions Increase (Step 1) Analysis Summary

	NO_x⁽¹⁾ (TPY)	CO⁽¹⁾ (TPY)	VOC⁽²⁾ (TPY)	PM_{2.5}⁽¹⁾ (TPY)	PM₁₀⁽³⁾ (TPY)	SO₂⁽⁴⁾ (TPY)	CO_{2e} (TPY)
BAE	80.48	40.23	414.47	3.65	15.28	0.37	--
Emissions Increases	27.16	13.11	212.46	1.86	1.86	0.09	18,733.50
PAE	107.64	53.34	626.93	5.51	17.14	0.46	18,733.50
PAE-BAE (PEI)	27.16	13.11	212.46	1.86	1.86	0.09	18,733.50
PSD SER	40	40	40	10	15	40	75,000
PSD Triggered?	No	No	Yes	No	No	No	No

⁽¹⁾ Based on a baseline period of 2016-2017.

⁽²⁾ Based on a baseline period of 2014-2015. Total VOC (includes ethanol).

⁽³⁾ Based on a baseline period of 2013-2014.

⁽⁴⁾ Based on a baseline period of 2015-2016.

Because the project's PEI value for VOC exceeds the respective SER, the analysis must progress to Step 2 of the PSD applicability evaluation for VOC.

D. Net Emissions Increase Analysis (Step 2)

1. Creditable Contemporaneous Increases and Decreases

Per OAC 252:100-8-31, a project's NEI is equal to the sum of the PEI and all creditable contemporaneous increases (CCI) and all creditable contemporaneous decreases (CCD) of emissions.

NEI = PEI + CCI - CCD

Creditable contemporaneous decreases and creditable contemporaneous increases are decreases and increases, respectively, in actual emissions (evaluated on an actual-to-potential basis) that occur within the contemporaneous period. Per paragraphs (B) and (G) of the definition of net emission increase under OAC 252:100-8-31, this period begins three years prior to the date construction commences on the proposed project and ends with the date the net emissions increase from the particular change occurs (i.e., the date construction is complete and normal operations begin for the new and modified units). A CCD is creditable if it is federally enforceable, equivalent in terms of environmental impacts, and in place before project operations commence. CCD and CCI relied on in previous PSD permits are not creditable, but changes included in past project evaluations that did not trigger PSD review continue to be creditable.

Goodyear anticipates commencing construction on the proposed project in December 2022 and starting normal operations in July 2027. Therefore, the contemporaneous period for the proposed project extends from December 2019 to July 2027. The list below includes projects that have occurred or are expected to occur within this contemporaneous period.

- 2011-0440-C (M-9): Issued April 14, 2020, authorizing installation of a tandem mixer.
- 2011-0440-TVR (M-11): Submitted to DEQ on October 23, 2020, requesting authorization to install a quad extruder, the removal of sixteen (16) curing presses, and the installation of eight (8) curing presses.
- 2011-0440-TVR (M-12): Issued April 23, 2021, authorizing installation of one (1) diesel-fired generator.
- 2011-0440-TVR (M-13): Submitted to DEQ August 25, 2021, requesting authorization to install eight (8) curing presses.
- 2011-0440-TVR (M-14): Submitted to DEQ on November 19, 2021, requesting authorization to install a third regenerative thermal oxidizer (RTO).
- 2011-0440-AD (M-15): Submitted to DEQ on November 29, 2021, requesting a permit applicability determination regarding the replacement of the extruder head on Extruder #4.
- Retirement of sixty-four (64) curing presses as a part of this proposed project.
- Retirement of three (3) green tire spray lines as a part of this proposed project.

Emissions from the retired curing presses are based on manufacturer data, past throughput of productive rubber, and emission factors from USTMA. The emissions from coupling agent usage are based on manufacturer provided data for the coupling agent. The information related to the coupling agent is considered proprietary and confidential business information. Emissions from the green tire spray lines are based on average actual emissions for 2020 and 2021. The following table presents the CCI and CCD values for these contemporaneous projects.

Contemporaneous Emissions Increases/Decreases

Project	VOC (TPY)
2011-0440-C (M-9)	33.38
2011-0440-TVR (M-11)	17.82
2011-0440-TVR (M-12)	0.46

Project	VOC (TPY)
2011-0440-TVR (M-13)	20.57
2011-0440-TVR (M-14)	0.21
2011-0440-AD (M-15)	0.00
Retirement of 64 curing presses	(67.54)
Retirement of 3 green tire spray lines	(0.16)
Total CCI/CCD	4.74

2. PSD Applicability Assessment Step 2 Results

Based on the PEI values and the CCI/CCD values listed previously, the significant net emissions increase values for the proposed project are summarized below.

PSD Applicability Analysis Results

Pollutant	SER (TPY)	PEI (TPY)	CCI/CCD (TPY)	NEI (TPY)	PSD Review Required?
VOC	40	212.45	4.47	217.19	Yes

As shown in the table above, the significant net emissions increase is greater than the respective SER. Therefore, a full PSD review is required for VOC for the proposed project. PSD required control technology and air quality analyses are included in the following sections of this Permit Memorandum.

SECTION VI. BACT ANALYSIS

Any major stationary source or major modification subject to PSD review must undergo an analysis to ensure the use of best available control technology (BACT). The requirement to conduct a BACT analysis is set forth in OAC 252:100-8-34(b). BACT is defined in OAC 252:100-8-31 as:

“...best available control technology means an emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each regulated NSR pollutant which would be emitted from any proposed major stationary source or major modification which the Director, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.”

A BACT analysis is required for each new or physically modified emission unit for each pollutant that exceeds an applicable PSD significant emission rate (SER). Since the VOC emissions from the proposed project exceed the applicable PSD SER, a BACT analysis is required to assess the necessary levels of control for this pollutant.

The following methodology for performing a top-down BACT analysis has been developed from the US EPA’s 1990 Draft New Source Review Workshop Manual - BACT Guidance. The analysis utilizes five key steps to identify the most suited BACT option for the project. The first step in

this approach is to determine, for the emission unit in question, the most stringent control available for a similar or identical source or source category. If it is shown that this level of control is technically, environmentally, or economically infeasible for the unit in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

Step 1: Identify Available Control Technologies

Available control technologies are identified for each emission unit in question. The following methods are used to identify potential control technologies: 1) researching the Reasonably Available Control Technology (RACT)/BACT/Lowest Achievable Emission Rate (LAER) Clearinghouse (RBLC) database; 2) surveying regulatory agencies; 3) drawing from previous engineering experience; 4) surveying air pollution control equipment vendors; and 5) surveying available literature.

Step 2: Eliminate Technically Infeasible Options

After the identification of control options, an analysis is conducted to eliminate technically infeasible options. A control option is eliminated from consideration if there are process-specific conditions that prohibit the implementation of the control technology.

Step 3: Rank Remaining Control Options by Control Effectiveness

Once technically infeasible options are removed from consideration, the remaining options are ranked based on their control effectiveness. If there is only one remaining option, or all of the remaining technologies could achieve equivalent control efficiencies, ranking based on control efficiency is not required.

Step 4: Evaluate and Eliminate Control Technologies Based on Energy, Environmental, and Economic Impacts

Beginning with the most efficient control option in the ranking, detailed economic, energy, and environmental impact evaluations are performed. If a control option is determined to be economically feasible without adverse energy or environmental impacts, it is not necessary to evaluate the remaining options with lower control efficiencies.

The economic evaluation centers on the cost effectiveness of the control option. Costs of installing and operating control technologies are estimated following the methodologies outlined in the EPA's OAQPS Control Cost Manual (CCM) and other industry resources. Cost effectiveness is expressed as dollars per ton of pollutant controlled. Objective analyses of energy and environmental impacts associated with each option are also conducted. Both beneficial and adverse impacts are discussed and quantified.

Step 5: Select BACT and Document the Selection as BACT

In the final step, one pollutant specific control option is proposed as BACT for each emission unit under review based on evaluations from the previous step. The resulting BACT standard is an emission limit unless technological or economic limitations of the measurement methodology would make the imposition of an emissions standard infeasible, in which case a work practice standard can be imposed.

Lastly, if a source is subject to an NSPS, the minimum control efficiency to be considered in a BACT analysis must result in an emission rate less than or equal to the NSPS emission rate. In other words, the applicable NSPS limit represents the maximum allowable emission limit (or ceiling) for an emission source.

A. Potential Control Technologies

The first step in the BACT analysis is to identify the possible control technologies for each applicable pollutant for each source or comparable emissions sources. For VOC emissions, the following control technologies were identified as potentially available controls for curing presses, green tires spray, and apexers.

RBLC Listed Control Technologies

Pollutant	Listed Control Technologies
VOC	Regenerative Thermal Oxidizer (RTO)
	Regenerative Catalytic Oxidation (RCO)
	Condensers
	Concentrators/Absorbers with RTO
	Good Design/Operation

For most source types, the EPA’s RACT/BACT/LAER Clearinghouse (RBLC) is the preferred reference. A review of the RBLC database was conducted in March of 2022 to identify emissions control options that were imposed by permitting authorities as BACT within the past ten years for emissions sources comparable to the proposed project. The summary of the search of the RBLC database conducted is tabulated below.

Summary of BACT Control Options from EPA’s RBLC Database

RBLC ID	OH-0351	OH-0351	SC-0190
Facility Name	Titan Tire Corporation of Bryan	Titan Tire Corporation of Bryan	Bridgestone Aiken County PSR Plant
Company Name	Titan Tire Corporation	Titan Tire Corporation	Bridgestone Americas Tire Operations, LLC
County	Williams	Williams	Aiken
State	OH	OH	SC
Permit No.	P0109768	P0109768	0080-0114-CS
Issuance Date	10/25/2012	10/25/2012	5/15/2017
Process Name	45 Tire Curing Presses	Curing Repair and Finishing	Rubber Tire Manufacturing
Throughput	71,015 TPY	96,398 TPY	N/A
Process Notes	Throughput is for 25 new units and additional tons of tires per year. Adding 25 new curing presses to the original 20, for a total of 45 curing presses.	Tons of tires per year. An increase in production in the finishing and curing repair areas.	Mixing and Milling, Extrusion (Sidewall Inner, Body Ply), Calendering, Tread Extrusion, Curing Processes, Tire Uniformity Optimizers, White Sidewall Grinding, Boiler
Pollutant	VOC	VOC	VOC
Control Method Description	N/A	Store all VOC containing materials in closed containers when not in use, minimize spills, employ water-based paints for tire coating where possible.	System to track silane usage and ensure proper amount added per batch. New employee training on operating and monitoring of equipment and computer systems. Training upon hire and annually; recorded.
Emission Limit #1	0.0003 lb/lb of tire produced	5.13 TPY (per rolling 12 months from finishing)	863 TPY (annual/12-month rolling sum, facility-wide)
Case-by-case Basis	BACT – PSD	BACT – PSD	BACT – PSD
Other Applicable Requirements	Operating Permit	Operating Permit	NSPS
Emission Limit #2	20.36 TPY (per rolling 12-months, 45 presses)	N/A	575 TPY (annual/12-month rolling sum mixing ops)
Pollutant Compliance Notes	Emissions for 45 curing presses, previously was 20 presses. No testing requirements in permit. Increase of 7.36 tons of VOC/rolling 12 months from the 25 additional presses. No add-on controls were cost-effective.	Not testing requirements in permit. No add-on controls were cost effective. This is an increase of 4.29 tons from the previous permit (was 0.84 tons/yr). Compliance is demonstrated through recordkeeping of materials used.	VOC, 12-month rolling sum. Curing Presses – 223.0 TPY VOC, 12-month rolling sum. Tire Uniformity Optimizers and White Sidewall Grinding – 6.2 TPY VOC, 12-month rolling sum. Boiler B2 – 0.0054 lb VOC/MMBtu (natural gas); 0.011 lb/MMBtu (propane) and work practice standards.

The RBLC search confirmed that no add-on control devices were identified as BACT for curing operations, green tire spray, or tire building. However, the analysis includes several potentially available controls as indicated previously.

1. Regenerative Thermal Oxidizers (RTOs)

A RTO consists of two or more heat exchangers connected by a common combustion zone. The heat exchangers use beds of ceramic beads to store and release heat recovered from the oxidation process. The VOC-laden air stream enters the first heat exchange bed where the air stream passes directly through the ceramic media and is then preheated before entering the combustion chamber. In the combustion chamber, a burner is used to supply any heat necessary to reach the optimum combustion temperature (usually at least 1,500°F) and complete the oxidation process. The cleaned air stream next enters a second heat exchanger where it passes directly through the ceramic media and is cooled while simultaneously heating the media before the air stream is exhausted to the atmosphere. The airflow through the heat exchange beds is reversed at regular intervals to conserve the heat of combustion within the RTO. VOC destruction efficiencies can be 98% or greater with thermal efficiencies as high as 95%.

2. Regenerative Catalytic Oxidation (RCO)

RCO systems use a catalyst to initiate the oxidation reaction instead of depending on heat alone. Reactions in a RCO usually take place between 500 F and 600°F. This creates the opportunity to reduce fuel expenses and materials cost (since the materials of construction will be subjected to lower temperatures than those attained in a thermal oxidizer). The addition of a preheater will further reduce the fuel costs. These types of oxidizers are just as capable of removing VOCs from a gas stream; However, the destruction efficiency can be lower than with a recuperative thermal oxidizer, or about 95%, depending upon the OVCs present in the gas stream and the effectiveness of the catalyst used. The control efficiency of and RCO tends to decrease as the catalyst ages.

3. Condensers

Condensation is a separation technique in which one or more volatile components of a vapor mixture are separated from the remaining vapor through saturation followed by a phase change. The phase change from gas to liquid can be achieved in two ways: (a) the system pressure can be increased at a given temperature, or (b) the temperature may be lowered at a constant pressure. In a two-component system where one of the components is noncondensable (e.g., air), condensation occurs at dew point (saturation) when the partial pressure of the volatile compound is equal to its vapor pressure.

4. Concentrators/Adsorbers with RTOs

Due to the relatively low concentration of VOC in the exhaust from the operations and high volumetric air flow rates, an adsorber can be placed upstream from a thermal oxidation unit to collect regulated constituents from the waste gas stream. Once a certain predetermined saturation level of the adsorbent is reached, the adsorber is desorbed through temperature and pressure swings and the higher concentrated waste stream is fed to the thermal oxidation device. Due to the higher

pollutant concentration, a higher destruction efficiency can be achieved and a smaller burner (and hence, less fuel) can be used as a lower volume of air will be passed through the oxidation unit.

5. Good Design/Operation

Good design and operation include the operation and maintenance of equipment in accordance with good air pollution control practices; applicable federal and state regulations, and manufacturers requirements to minimize VOC emissions.

B. BACT Analysis for Curing Presses – VOC Emissions

1. Step 1 – Identify All Control Technologies

While there were no existing add-on control technologies identified in the RBLC as BACT for curing presses, an evaluation of various control options was conducted as discussed under Section VI.A of this Permit Memorandum.

2. Step 2 – Eliminate Technically Infeasible Control Options

The curing operations at Goodyear Lawton are spread out over a very large area within the facility (approximately 11 acres total) with 86 emission points. The large area over which the emissions evolve makes fume hoods technically infeasible for capturing emissions from these sources. These areas are designed to provide uninhibited and safe access by personnel and automated units during the curing process. Enclosing this entire area would impede the normal flow of personnel and material and therefore requires a complete reevaluation of production layout and applicable safety standards.

The low concentrations of VOCs in the resulting fugitive exhaust streams would also make concentrators in series with thermal oxidation or only thermal/catalytic oxidation technically infeasible. Although the Btu content of the curing presses' fugitive emissions through the facility's ventilation system is not readily available, the VOC concentration of the emissions can be readily estimated. As discussed previously, each new curing press will maintain a potential to emit of 0.5 pounds of VOC per hour. This equates to approximately 26 pounds per hour from all fifty-two (52) new presses, which will occupy an approximate 2.2-acre area in the curing press business center. According to data gathered from Goodyear Lawton's maintenance staff, the ventilation rate in this 2.2-acre area is a minimum of 220,000 standard cubic feet per minute. Given these parameters and an estimated molecular weight for VOC of 46.07 lb/lb-mole (conservatively based on ethanol), and the volume of an ideal gas of 385.3 SCF/lb-mole at 20 °F the total VOC concentration from these emissions is approximately 16 ppmv.

The permit for the Bridgestone Americas Tire Operations, LLC, Bridgestone Aiken County PSR Plant issued in 2017 (identified as RBLC ID # SC-0190 in the table labeled Summary of BACT Control Options from EPA's RBLC Database in this Permit Memorandum) cited EPA's *Choosing and Adsorption System for VOC: Carbon, Zeolite, or Polymers?* (May 1999) which established a minimum 20 ppmv threshold for adsorbers, which is higher than the calculated ethanol concentration in the vented emissions from curing operations (16 ppm). Further, guidance such as

EPA's *Control Technologies for Hazardous Air Pollutants*, June 1991 (EPA 625/6-91/014) and *Low Concentration Organic Vapor Streams*, May 1995 (EPA 456/R-95-003) recommend oxidation control for streams with VOC concentrations greater than 50 ppmv. Additionally, several standards such as 40 CFR Part 63, Subpart DDDD (Plywood and Composite Wood Products MACT) and 40 CFR Part 63, Subpart CC (Refinery MACT) both provide a control efficiency-based standard and a 20-ppmv total hydrocarbon outlet concentration standard. For these reasons, there are no technically feasible add-on control options for the curing operations.

3. Step 3 – Ranking of Remaining Control Technologies by Effectiveness

The only remaining control option for minimizing VOC emissions from the curing presses is good design/operation. Therefore, good design/operation is the most effective technically feasible control option available.

4. Step 4 – Top-Down Evaluation of Control Options

All add-on control technologies for the curing presses were deemed technically infeasible in Step 2 of the BACT analysis. Therefore, the only feasible control technology remaining is good design and operation.

5. Step 5 – Section of BACT

Based on Steps 1 through 4 of the BACT analysis, add-on control devices on the new curing presses were determined to be technically infeasible. Given the technical considerations noted above, DEQ selects an equivalent VOC BACT option of good design and operation for these emission units. The following BACT requirements will be added to the specific conditions of the permit:

- a. The curing presses listed above shall be operated in accordance with the following “good design and operating” practices: [OAC 252:100-8-34(b)]
 - i. Operate and maintain the curing presses in accordance with manufacturer requirements and internal written standard operating procedures.
 - ii. Preventative maintenance on the curing presses will be conducted at least annually (once every calendar year). The date, time, and maintenance performed shall be recorded as completed.
 - i. Regulated chemicals and solids with VOCs related to curing operations will be stored and utilized in a way to minimize emissions and the potential for spills. Goodyear shall conduct initial and annual (once every calendar year) associate training on proper regulated material handling and spill cleanup. Records of completed training and documentation will be maintained and shall be provided to regulatory personnel upon request.
 - iii. Waste materials from spills of such regulated materials will be immediately collected and properly disposed off-site.

C. BACT Analysis for Green Tire Spray – VOC Emissions

1. Step 1 – Identify All Control Technologies

While there were no existing add-on control technologies identified in the RBLC as BACT for green tire spray operations, an evaluation of various control options was conducted as discussed under Section VI.A of this Permit Memorandum. Additionally, good design/operating practices pursuant to compliance with 40 CFR Part 60, Subpart BBB were identified as applicable control options for green tires spray operations.

2. Step 2 – Eliminate Technically Infeasible Control Options

Based on the RBLC search discussed previously in Section VI.A of this Permit Memorandum, no add-on control technologies have been identified as BACT for green tire spray booths. As opposed to the fugitive emissions from the curing presses and apexers, the green tire spray booths are vented through fume hoods. According to the manufacturer, the fume hoods maintain a volumetric emission flow rate of 9,300 standard cubic feet per minute (SCFM). Given the information provided in the green tire spray booth calculations in Section V of this Permit Memorandum, each green tire spray booth emits approximately 0.2538 pounds of VOC per hour. As such, the green tire spray booth emission VOC concentration is approximately 4 ppmv. For the reasons provided in the BACT analysis for curing presses in Section VI.B, this low concentration makes any add-on control technology infeasible.

3. Step 3 – Ranking of Remaining Control Technologies by Effectiveness

The only remaining control option for minimizing VOC emissions from the new green tire spray operation is good design/operation. Therefore, good design/operation is the most effective technically feasible control option available.

4. Step 4 – Top-Down Evaluation of Control Options

All add-on control technologies for the green tire spray operations were deemed technically infeasible in Step 2 of the BACT analysis. Therefore, the only feasible control technology remaining is good design and operation.

5. Step 5 – Selection of BACT

Based on Steps 1 through 4 of the BACT analysis, add-on control devices on the new green tire spray operations were determined to be technically infeasible. Given the technical considerations noted above in Step 2 of this BACT analysis and Step 2 of the BACT analysis for curing presses discussed in Section VI.B, DEQ selects an equivalent VOC BACT option of good design and operation for these emission units. Good design/operation includes, but are not limited to, the use of water-based green tire sprays with VOC content limited to 40 CFR Part 60, Subpart BBB requirements. The following BACT requirements will be added to the specific conditions of the permit:

- a. The green tire spray booth equipment listed above shall be operated in accordance with the following “good design and operating” practices: [OAC 252:100-8-34(b)]
- i. The green tire spray booths shall be limited to use only water-based green tires sprays which shall meet the VOC content limitations set forth in 40 CFR Part 60, Subpart BBB.
 - ii. Monitor and maintain records required by 40 CFR Part 60, Subpart BBB.
 - iii. Operate and maintain the green tire spray booths in accordance with manufacturer requirements and written standard operating procedures.
 - iv. Preventative maintenance on the green tire spray booths will be conducted at least annually (once every calendar year). The date, time, and maintenance performed shall be recorded as completed.
 - v. Regulated chemicals and solids with VOCs related to green tire spray booth operations will be stored and utilized in a way to minimize emissions and the potential for spills. Goodyear shall conduct initial and annual (once every calendar year) associate training on proper regulated material handling and spill cleanup. Records of completed training and documentation will be maintained and shall be provided to regulatory personnel upon request.
 - vi. Waste materials from spills of such regulated materials will be immediately collected and properly disposed off-site.

D. BACT Analysis for Apexers – VOC Emissions

1. Step 1 – Identify All Control Technologies

While there were no existing add-on control technologies identified in the RBLC as BACT for apexers, an evaluation of various control options was conducted as discussed under Section VI.A of this Permit Memorandum.

2. Step 2 – Eliminate Technically Infeasible Control Options

The apexers at Goodyear Lawton are spread out over a large area within the facility (approximately 0.11 acres). Further, the emissions of VOCs to the atmosphere from the apexers are relatively dilute as they are part of the air inside the building which leaves the structure from the building ventilation systems. The large area over which the emissions evolve makes fume hoods technically infeasible for capturing emissions from these sources. Consequently, the only feasible method for capturing the emissions would be to vent the exhausts from the entire structure to a thermal oxidizer. The low concentrations of VOCs in the resulting exhaust stream, however, would make vent hoods, adsorption, and thermal oxidation technically infeasible for the same reasons discussed in Section VI.B for the curing presses. Although Goodyear Lawton does not have ventilation data in this area readily accessible, given that these apexers will occupy a total area of 0.12 acres and is multiple orders-of-magnitude less than the fugitive curing presses, the VOC concentrations in the apexers’ fugitive emissions can be considered to be significantly less than the 20-ppmv threshold referenced in Step 2 of the curing press BACT analysis discussed in Section VI.B of this

Permit Memorandum. For these reasons, there are not technically feasible add-on control options for the apexers.

3. Step 3 – Ranking of Remaining Control Technologies by Effectiveness

The only remaining control option for minimizing VOC emissions from the new apexers is good design/operation. Therefore, good design/operation is the most effective technically feasible control option available.

4. Step 4 – Top-Down Evaluation of Control Options

All add-on control technologies for the apexers were deemed technically infeasible in Step 2 of the BACT analysis. Therefore, the only feasible control technology remaining is good design and operation.

5. Step 5 – Selection of BACT

Based on Steps 1 through 4 of the BACT analysis, add-on control devices on the new apexers were determined to be technically infeasible. Given the technical considerations noted above, DEQ selects an equivalent VOC BACT option of good design and operation for these emission units. The following BACT requirements will be added to the specific conditions of the permit:

- a. The apexers listed above shall be operated in accordance with the following “good design and operating” practices: [OAC 252:100-8-34(b)]
 - ii. Operate and maintain the apexers in accordance with manufacturer requirements and written standard operating procedures.
 - iii. Preventative maintenance on the apexers will be conducted at least annually (once every calendar year). The date, time, and maintenance performed shall be recorded as completed.
 - iv. Regulated chemicals and solids with VOC s related to apexer operations will be stored and utilized in a way to minimize emissions and potential for spills. Goodyear shall conduct initial and annual (once every calendar year) associate training on proper regulated material handling and spill cleanup. Records of completed training and documentation will be maintained and shall be provided to regulatory personnel upon request.
 - v. Waste materials from spills of such regulated materials will be immediately collected and properly disposed off-site.

SECTION VII. AIR QUALITY ANALYSES

Since the total facility-wide net emissions increase associated with the proposed project exceed the PSD significant emission rate for VOC (as a precursor for ozone) an air quality analysis is necessary. The analysis must demonstrate that ambient impacts of ozone due to emissions from the proposed project to not necessitate preconstruction ambient monitoring and do not cause or contribute to a violation of a National Ambient Air Quality Standard (NAAQS) or exceed a PSD Increment. Additionally, all PSD permit applications which address additional impacts (i.e.,

impacts to growth, soils, vegetation, and visibility) and impacts to Class I areas. Each aspect of the air quality analysis is addressed below.

A. Ozone Analyses

Ozone is a secondary pollutant formed through chemical reaction between precursors, NO_x and VOC, in the presence of sunlight. Since the proposed project’s net emissions increase of VOC is greater than 100 TPY, an ozone ambient impact analysis is required per EPA’s *Ambient Monitoring Guidelines for Prevention of Significant Deterioration (PSD)*, May 1987 (EPA-450/4-87-007). Additionally, preconstruction ambient monitoring must be addressed.

1. Ozone Ambient Monitoring

Per EPA’s *Ambient Monitoring Guidelines for Prevention of Significant Deterioration (PSD)*, if existing data from ambient monitoring stations operated by federal, state, or local agencies are representative of the concentrations expected to occur in the area surrounding the plant site, this data may be used to fulfill the preconstruction monitoring requirements. As explained further below, ambient ozone concentrations from Lawton, OK (Site ID 40-031-0651) provide a representative estimate of the ozone concentrations in the area surrounding Goodyear Lawton.

The above-mentioned ozone monitoring site is determined to be representative of the region surrounding Goodyear Lawton based on an evaluation of the following criteria:

- Proximity of the ambient monitoring station to Goodyear Lawton,
- Availability of complete ozone monitoring data for three recent calendar years (i.e., 2019 through 2021), and
- Similarity of the emission profile and surrounding air shed in the region of the monitoring station and Goodyear Lawton.

Based on these criteria, the Lawton monitor is selected as the site which is the most representative of the ozone concentration data for the area surrounding Goodyear Lawton during the most recent three-year period. Goodyear proposes to use the data from this ozone monitoring station for estimating ozone background concentrations in lieu of conducting preconstruction monitoring. The average of the annual fourth highest daily 8-hour maximum concentrations for the most recent three years of certified ozone monitoring data (i.e., the design value) for the monitoring station is shown in the table below.

Representative Ozone Design Value

Monitor ID	Monitor Location	Distance to Goodyear Lawton	Design Value (ppb) ⁽¹⁾
40-031-0651	2211 NW 25 th Street, Lawton, OK	8.25 km (NE)	65.3

⁽¹⁾ The average of the 4th high monitored 8-hour ozone values from 2019 through 2021.

Based on the discussion above, use of the monitoring data collected at the Lawton, OK monitoring site is presumed to satisfy preconstruction monitoring requirements.

2. Ozone Impacts Analysis

40 CFR Part 51, Appendix W, *Guidance on Air Quality Models*, recommends a two-tiered approach for addressing single source impacts of ozone. Tier 1 uses relationships between emissions and ambient impacts developed from existing modeling studies to estimate by interpolation the predicted ambient impacts from a proposed project. Tier 2 estimates impacts using project-specific chemical transport modeling (e.g., with an Eulerian grid or Lagrangian model).

To demonstrate that the VOC net emissions increase (NEI) and NO_x project emission increase (PEI) associated with the proposed project will not cause or contribute to an exceedance of the 8-hour average ozone NAAQS of 70 ppb (0.070 ppm), a tier I demonstration is made. Specifically, this analysis utilizes a spreadsheet tool following 40 CFR Part 51, Appendix W and EPA’s *Guidance on the Development of Modeled Emission Rates for Precursors (MERPs) as a Tier I Demonstration Tool for Ozone and PM_{2.5} under the PSD Permitting Program*, April 30, 2019 (EPA-454/R-19-003), or “MERPs Guidance,” to estimate single-source impacts based on “air quality modeling of hypothetical industrial sources with similar source characteristics and emission rates of precursors that are located in similar atmospheric environments and for time periods that are conducive to the formation of ozone or secondary PM_{2.5}.”

The MERPs Guidance presents the modeled impacts from several hypothetical industrial sources. One of these hypothetical modeling analyses is for a source located in Canadian County, Oklahoma (identified as 12EUS2 Source 23 in the MERPs Guidance Appendix A, Figure A-2, Table A-1), which is approximately 79 miles from Goodyear Lawton. EPA completed several modeling scenarios for the hypothetical source – varying both the emission rate (500 TPY, 1,000 TPY, or 3,000 TPY) and the stack height (a “low” height at 10 m and a “high” height at 90m).

The modeled scenario most representative of Goodyear’s proposed project is the “low” height scenario, which include VOC and NO_x emissions at a rate of 500 TPY each. Using the hypothetical model for the representative source, the following equation is used to calculate the MERPs for the precursors of ozone.

$$MERP = \text{Critical Air Quality Threshold} \times \frac{\text{Modeled emission rate from hypothetical source}}{\text{Modeled air quality impact from hypothetical source}}$$

The daily MERPs calculated using the above procedures are listed in the following table.

Ozone MERPs

Precursor	Domain	Area	Height	Source No.	Modeled Emission Rate (TPY)	Critical Air Quality Threshold (ppb) ⁽¹⁾	Modeled Impact (µg/m ³)	Daily MERP (TPY)
VOC	12EUS2	CUS	Low	23	500	1.0	0.068	7,343
NO _x	12EUS2	CUS	Low	23	500	1.0	0.584	856

⁽¹⁾ The critical air quality threshold for ozone (8-hour averaging period) is 1.0 parts per billion (ppb) based on recommended values in EPA’s draft SIL guidance.

As described in the MERPs Guidance, the proposed emission increases are compared to the MERPs to determine whether the proposed project’s air quality impact exceeds the critical air quality threshold. The following table shows this comparison

Precursor	Proposed Emissions Increase (TPY)	Daily MERP (TPY)
VOC ⁽¹⁾	217.19	7,343
NO _x	27.16	856
Critical Air Quality Threshold (ppb)		1.0
Project increase as % of MERP ⁽²⁾		6.13%
Ozone Impact (ppb)		0.061

⁽¹⁾ Total VOC (includes ethanol).

⁽²⁾ Calculated as (precursor VOC emissions / Daily MERP for VOC) + (Precursor NO_x emissions / Daily MERP for NO_x).

To further demonstrate compliance with the NAAQS, the ozone impact calculated in the table above is conservatively added to the maximum of the representative background monitoring design values presented from the Lawton, Oklahoma ambient ozone monitor (40-031-0651) previously.

Ozone Impact from MERPs Analysis (ppb)	Ambient Monitor Design Value (ppb)	Total Impact (ppb)	NAAQS (ppb)	Compliance Demonstrated?
0.061	65.3	65.4	70	Yes

B. Additional Impacts Analyses

Per OAC 252:100-8-35.2, all PSD applications must include an Additional Impacts Analysis consisting of projected air quality impacts and impairment to visibility, soils, and vegetation as a result of the source or modification and general commercial, residential, industrial, and other growth associated with the source or modification.

1. Growth Analysis

The purpose of the growth analysis is to predict quantitatively the amount of new growth likely to occur to support the source or modification under review and to estimate the emissions that will result from the associated growth. First, an assessment is made regarding the amount of residential growth the modified source will bring to the area. This depends on the size of the available work force, the number of new employees, and the availability of housing in the area. Associated commercial and industrial growth consists of new sources providing good and services to the new employees and to the modified source itself. Once these anticipated growth effects have been considered, an estimate of the air pollutant emissions that would likely result from the associated growth is made.

The improvements made by the project will not result in any net additional labor on a permanent basis. Furthermore, no major secondary industry growth will result from the proposed project. Thus, any air quality impact resulting from industrial, commercial, and residential growth in the local area due to the proposed project will be negligible.

2. Soil and Vegetation Analysis

The secondary NAAQS were established at concentration levels below which no harmful effects to either soil or vegetation is expected. As demonstrated previously, the proposed project will have no adverse impact on the NAAQS. Thus, it can be concluded that any impact on soil and vegetation will be negligible.

3. Visibility Analysis

Under EPA's *New Source Review Workshop Manual, Draft* (October 1990), EPA prescribes the use of its *Workbook for Plume Visual Impact Screening and Analysis* for conducting a visibility impairment analysis. Three levels of screening procedures are outlined by EPA. If the criteria for the first (most conservative) screening level are met, no further analysis is required. The VISCREEN model is recommended for the first level (Level 1) screen. If calculated values from the VISCREEN model are greater than the standardized screening values, the emissions are considered to potentially impair visibility. If the potential for visibility impairment is indicated, the next level analysis, Level 2 analysis, is required. The VISCREEN model primarily considers NO₂ and particulate emissions increases associated with a modification; VISCREEN does not consider or calculate visibility impacts due to ozone.

For this project, VISCREEN was executed based on the PEI value for NO_x (as NO₂) and PM₁₀ (as particulates) as 27.16 TPY and 1.86 TPY, respectively. The PEI was used in this analysis because netting was not triggered for NO_x or PM₁₀. The VISCREEN analysis concluded that "Maximum Visual Impacts INSIDE Class I Area Screening Criteria ARE NOT Exceeded" and "Maximum Visual Impacts OUTSIDE Class I Area Screening Criteria ARE NOT Exceeded." Therefore, the proposed project's emissions will not cause visibility impairment.

C. Class I Area Analyses

One of the purposes of the PSD program is "to preserve, protect, and enhance the air quality in national parks, national wilderness areas, national monuments, national seashores, and other areas of special national or regional natural, recreational, scenic, or historic value," (42 U.S.C §7470(2)). Under the PSD provisions, Congress established a land classification scheme for these areas of the country (Class I), specifically including:

1. International parks;
2. National wilderness areas which exceed 5,000 acres in size;
3. National memorial parks which exceeded 5,000 acres in size; and
4. National parks which exceeded 6,000 acres in size.

The Class I area nearest Goodyear Lawton is the Wichita Mountains Wildlife Refuge in southwestern Oklahoma at 21.7 km. Class I area analyses, when requested, typically include a Class I PSD Increment assessment for NO_x, SO₂, and PM₁₀, as well as an Air Quality Related Values (AQRV) assessment, for increases in visibility impairing pollutants and a deposition analysis for nitrogen and sulfur. The proposed project is not expected to result in emissions of any of the above pollutants that exceed the respective PSD increment significant emission rate.

Section 3.2 of the *Federal Land Managers' Air Quality Related Values Workgroup (FLAG) – Phase I Report-Revised (2010)*, provides initial screening criteria for AQRV Class I area analysis as follows: if the summation of NO_x, SO₂, PM₁₀ and H₂SO₄ from the project divided by the distance of the source to the Class I area is less than 10, then a Federal Land Manager will not request any further Class I AQRV impact analysis from the source. The screening analysis for the proposed project resulted in a screening level of less than 10. The Department of Interior – Fish and Wildlife Service was notified of the PSD construction permit application for a facility which may impact the Wichita Mountains Wildlife Refuge. No additional Class I area AQRV analysis was requested by the Federal Land Manager.

SECTION VIII. EQUIPMENT

The emission units (EUs) have been arranged into the following Emission Unit Groups (EUGs).

EUG Designation	EU Group Name and Information
EUG-BB	Banbury Mixers
EUG-EXT	Extruders 2, 3, 5, 6, 7, 8 and 9
EUG-EXTNSPS	Extruders 1 and 4
EUG-GC	Gum Calender 2 and 3
EUG-FWC	Fabric & Wire Calenders
EUG-GTS	Non-NSPS Green Tire Spray Booths
EUG-GTSNSPS	NSPS Green Tire Spray Booths
EUG-HF	Hot Former
EUG-STRIPP	Green Tire Stripping
EUG-CP	Curing Presses
EUG-GRFVM	Force Variation Machines & Radial Run-out Grinders
EUG-GRWSW	White Sidewall Grinders
EUG-BLUE	White Sidewall Machines
EUG-RECYCLE	Recycling Mills
EUG-B&W	Babcock and Wilcox Boilers
EUG-KEEL	Keeler Boiler
EUG-COOL	Cooling Towers
EUG-TANK	Gasoline/Diesel Split Tank
EUG-CI-NSPS	Stationary CI-RICE Subject to NSPS, Subpart IIII
EUG-EBP	Electron Beam Processing

EUG “BB” Banbury Mixers

EU	POINT	EU Name / Model	Constr./Mod. Date
BB01	12U	Banbury # 1 mixer (routed to dust collector)	1985
BB01M1	12U	Banbury # 1 100” mill (routed to scrubber)	1985
BB01M2	12U	Banbury # 1 84” mill (routed to scrubber)	1985
BB01 SDT	14U	Banbury # 1 Scrubber discharge tank	1985
BB01SU	13U	Banbury # 1 slurry unit	1985
BB01SC	15U	Banbury # 1 slab cooling	1985
BB02	12W	Banbury #2 mixer (routed to dust collector)	1979
BB02M1	112W	Banbury #2 100” mill (routed to scrubber)	1979
BB02M2	12W	Banbury # 2 84” mill (routed to scrubber)	1979
BB02SDT	14W	Banbury # 2 Scrubber discharge tank	1979
BB02SU	17W	Banbury # 2 slurry unit	1979
BB02SC	17W- 21WZ	Banbury # 2 slab cooling	1979
BB03	12BN	Banbury #3 mixer (routed to dust collector)	1979
BB03EXT	12BN	Banbury #3 extruder and takeaway (routed to scrubber)	1979
BB03M1	12BN	Banbury # 3 100" mill (routed to scrubber)	1979
BB03M2	13BN	Banbury # 3 84" mill (routed to scrubber)	1979
BB03SDT	15BN	Banbury # 3 scrubber discharge tank	1979
BB03SU	19BN	Banbury # 3 slurry unit	1979
BB03SC	20BN	Banbury # 3 slab cooling	1979
BB04	11CN	Banbury # 4 mixer (routed to dust collector)	1979
BB04EXT	11CN	Banbury # 4 extruder and takeaway (routed to scrubber)	1979
BB04M1	12CN	Banbury # 4 100" mill (routed to scrubber)	1979
BB04M2	13CN	Banbury # 4 84" mill (routed to scrubber)	1979
BB04SC1	15CN	Banbury # 4 scrubber discharge tank	1979
BB04SC2	16CN	Banbury # 4 slurry unit	1979
BB04SC3	19CN	Banbury # 4 slab cooling	1979
BB05	11EN	Banbury # 5 mixer (routed to dust collector & RTO)	1979/2011
BB05EXT	12EN	Banbury # 5 extruder and takeaway (routed to scrubber)	1979
BB05M1	12EN	Banbury # 5 100" mill (routed to scrubber)	1979
BB05M2	13EN	Banbury # 5 84" mill (routed to scrubber)	1979
BB05SDT	14FN	Banbury # 5 scrubber discharge tank	1979
BB05SU	17EN	Banbury # 5 slurry unit	1979
BB05SC	21EN	Banbury # 5 slab cooling	1979
BB06	12GN	Banbury # 6 Mixer (routed to dust collector & RTO)	1992

EU	POINT	EU Name / Model	Constr./Mod. Date
BB06EXTRD	12ZFX/N	Banbury # 6 roller die extruder (routed to scrubber)	1992
BB06SDT	13GN	Banbury # 6 Scrubber discharge tank	1992
BB06SU	13FXN	Banbury # 6 slurry unit	1992
BB06SC	15-21GN	Banbury # 6 slab cooling	1992
BB07	12ZHN	Banbury # 7 mixer (routed to dust collector & RTO)	1995/2007
BB07EXTRD	12HN	Banbury # 7 roller die extruder (routed to scrubber)	1995
BB07SDT	13JN	Banbury # 7 Scrubber discharge tank	1995
BB07SU	13HN	BB #7 slurry unit	1995
BB07SC	13-21HN	BB #7 slab cooling	1995
BB08	11Sx	Banbury #8 mixer (routed to dust collector)	1979
BB08M1	11Sx	Banbury #8 84" Mill	1979
BB08M2	12Sx	Banbury #8 84" Mill	1979
BB08SU	13Sx	Banbury #8 slurry unit	1979
BB08SC	13-15Sx	Banbury #8 Slab cooling	1979

EUG "EXT": Extruders 2, 3, 5, 6, 7, 8 and 9

EU	POINT	EU Name / Model	Constr. /Mod. Date
CU02	37M	Duplex extruder #2	1979
CU02A	38L	3.5" extruder (not in use)	1979
CU02B	39L	4.5" extruder	2006
CU02M1	38N	84" mill # 1	1979
CU02M2	39M	84" mill #2	1979
CU02M3	40L	36" cushion mill	1979
CU02SC	42-44L	Cooling line	1979
CU03	40L	Single 8" extruder #3	1979
CU03SC	42-45L	Cooling line	1979
CU05	38J	Duplex extruder #5	1979
CU05M1	38L	Mill #1	1979
CU05M2	39L	Mill #2	1979
CU05SC	39-45J	Slab cooling	1979
CU06	38G	Triplex extruder #6	1979
CU06A	41G	3.5" Extruder	1979
CU06M1	41G	36" Cushion mill	1979
CU06SC	42G	Cooling line	1979
CUM07	35H	Tread line #7 marking / striping	1993
CU07	35J	Tread line #7 quad extruder #7 (4.5", 8", 10",6")	1993

EU	POINT	EU Name / Model	Constr. /Mod. Date
CU07M1	34H	Tread line #7 36" mill	1993
CU07SC1	37J	Tread line #7 cooling #1	1993
CU08	38N	Extruder # 8	1979
CU09	38E	Treat line # 9	2011

EUG “EXTNSPS”: Extruders 1 and 4

EU	POINT	EU Name / Model	Constr. /Mod. Date
TLM01	32L	Tread line #1 marking / striping	1992
TLM04	32J	Tread line #4 marking / striping	1992
TU01	31L	Tread line #1 quad extruder (6", 12", 4.5", 8")	1979
TU01-CE	54L	Tread line #1 end cement application	1985
TU01M1	31N	Tread line #184" single mill #1	1979
TU01SC	34L	Tread line # 1 cooling line	1979
TU04	30K	4.5", 6", & 10" Triplex Extruder #4	1979
TU04-CE	54J	Tread line #4 end cement application	1985
TU04M1	32N	Tread line #4 batchoff mill #1	1979
TU04SC	35-49J	Tread line #4 cooling line	1979

EUG “GC”: Gum Calenders

EU	POINT	EU Name / Model	Constr. /Mod. Date
GC2	38Q	Gum calender #2	1979
GC2M1	37N	Gum calender #2 mill #1	1979
GC2M2	37Q	Gum calender #2 mill #2	1979
GC2SC1	39-40Q	Gum calender #2 covered cooling area	1979
GC3	44N	Gum calender #3	1979
GC3M1	44N	Gum calender #3 mill #1	1979
GC3SC1	39-43N	Gum calender #3 covered cooling area	1979
GC4	41Q	Gum calender #4	2016
GC4M1	42Q	Gum calender #4 mill #1	2016
GC4SC1	43Q	Gum calender #4 covered cooling area	2016

EUG “FWC”: Fabric & Wire Calenders

EUG	POINT	EU Name / Model	Constr. /Mod. Date
FC1	15L	Fabric / Wire Calender (routed to scrubber)	1979
FC1F1	11L	Fabric / Wire Calender Leftoff festoon & drying	1979
FC1F2	16-17L	Fabric / Wire Calender Windup festoon & cooling	1979
FC1M1	12MY	Fabric / Wire Calender mill #1	1979
FC1M2	13MY	Fabric / Wire Calender mill #2	1979

EUG	POINT	EU Name / Model	Constr. /Mod. Date
FC1M3	14MY	Fabric / Wire Calender mill #3	1979
FC1M4	14MY	Fabric / Wire Calender mill #4	1979
FC1P1	11L	Fabric / Wire Calender Splice press #1	1979
FC1P2	14L	Fabric / Wire Calender Splice press #2	1979
FC1SC	17N	Fabric / Wire Calender scrubber discharge tank	1998
SPC-SP	17N	Fabric / Wire Calender Splice press	1979
FC2	12-22N	Fabric Calender	2005
FC2M1	22Q	Fabric Calender mill #1	2005
FC2M2	21Q	Fabric Calender mill #2	2005
FC2M3	20Q	Fabric Calender mill #3	2005
FC2M4	19Q	Fabric Calender mill #4	2005

EUG “GTS”: Non-NSPS Green Tire Spray Booths ⁽¹⁾

EU	POINT	EU Name / Model	Constr. /Mod. Date
PL-01	80HW	Backup spray booth #1 (Manual)	1979
PL-02	80Kz	Backup spray booth #2 (Manual)	1979
PLT-01	80Kz	Green tire paint tank	1979
PLT-02	80Kz	Green tire paint tank	1979
SPR04	79FY	Green tire spray booth #3 (Automatic)	1979

⁽¹⁾ – Each spray booth includes associated storage containers.

EUG “GTSNSPS”: NSPS Green Tire Spray Booths ⁽¹⁾

EU	POINT	EU Name / Model	Constr. /Mod. Date
PL-03	80Dz	Backup spray booth #3 (Manual - NSPS)	1989
PL-04	80Q	Backup spray booth #4 (Manual - NSPS)	2002
PLT-03	80Mz	Green tire paint tank	2002
PLT-04	80FY	Green tire paint tank	1989
SPR05	80FY	Green tire spray booth #2 (Automatic - NSPS)	1989
SPR06	80BY	Green tire spray booth #1 (Automatic - NSPS)	1989
SPR07	80Q	Green tire spray booth #7 (Automatic - NSPS)	2002
SPR08	81Q	Green tire spray booth #8 (Automatic – NSPS)	2010
PL-05	79HW	Backup spray booth #1 (Manual)	TBD
PLT-01	80KZ	Green tire paint tank	TBD
PLT-02	80KZ	Green tire paint tank	TBD
SPR01	82MK	Green tire spray booth #6 (Automatic)	TBD
SPR02	82KZ	Green tire spray booth #5 (Automatic)	TBD
SPR03	82HW	Green tire spray booth #4 (Automatic)	TBD

⁽¹⁾ – Each spray booth includes associated storage containers.

EUG “HF”: Hot Former

EU	POINT	EU Name / Model	Constr./Mod. Date
HF01	50-62VWx	Hot Former #1	2002

EUG “STRIPP”: Green Tire Stripping

EU	POINT	EU Name / Model	Constr./Mod. Date
STRIPP	80-81Bz	Green Tire Stripping Area Vent (Relocated to the Oil/Water Separator Area)	1995/2010

EUG “CP”: Curing Presses

EU	POINT	EU Name / Model	Constr. /Mod. Date
CP01	88-95NW	32 curing presses – Trench #1 (1900/2000 rows)	2011-2012
CP02	88-95L	32 curing presses – Trench #2 (1700/1800 rows)	2006-2007
CP03	88-95HW	32 curing presses – Trench #3 (1500/1600 rows)	1979
CP04	88-95FY	32 curing presses – Trench #4 (1300/1400 rows)	1979
CP05	88-95Dz	32 curing presses – Trench #5 (1100/1200 rows)	1979
CP06	88-95BY	26 curing presses – Trench #6 (900/1000 rows)	TBD
CP07	88-95ZS	26 curing presses – Trench #7 (700/800 rows)	TBD
CP08	88-95DS	28 curing presses – Trench #8 (500/600 rows)	2015
CP09	88-95	29 curing presses – Trench #9 (300/400 rows)	2000
CP21	87-96X	30 curing presses – Trench #21 (2100/2200 rows)	2005
CP22	87-97	18 curing presses – Trench #11	2016

EUG “GRFVM”: Force Variation Machine & Radial Run-Out Grinders ⁽¹⁾

EU	POINT	EU Name / Model	Constr. /Mod. Date
FG01	100N	Force grinder #1	1979
FG02	101N	Force grinder #2	1979
FG03	101N	Force grinder #3	1979
FG04	102N	Force grinder #4	1979
FG05	103N	Force grinder #5	1979
FG06	103N	Force grinder #6	1979
FG07	104N	Force grinder #7	1979
FG08	104N	Force grinder #8	1979
FG09	105N	Force grinder #9	1979
FG10	105N	Force grinder #10	1979
FG11	106N	Force grinder #11	1979
FG12	106N	Force grinder #12	1979
FG13	107N	Force grinder #13	1979
FG14	108N	Force grinder #14	1979
FG16	109N	Force grinder #16	1979

EU	POINT	EU Name / Model	Constr. /Mod. Date
FG17	109N	Force grinder #17	2016
FG18	110N	Force grinder #18	2016
FG19	110N	Force grinder #19	2016
FG20	111N	Force grinder #20	2014
FG21	112N	Force grinder #21	2014
FG23	105Dz	Force grinder #23	2000
FG24	104Dz	Force grinder #24	1979
FG25	107Dz	Force grinder #25	1979
FG26	107Dz	Force grinder #26	1979
FG27	108Dz	Force grinder #27	1979
FG28	108Dz	Force grinder #28	1979
FG29	109Dz	Force grinder #29	1979
FG30	110Dz	Force grinder #30	1979
FG31	110Dz	Force grinder #31	1979
FG32	111Dz	Force grinder #32	1979
FG33	111Dz	Force grinder #33	1979
FG34	112Dz	Force grinder #34	1979
FG35	112Dz	Force grinder #35	1987
FG36	113Dz	Force grinder #36	1987
FG37	107J	Force grinder #37	1988
FG38	107J	Force grinder #38	1988
FG39	108J	Force grinder #39	1988
FG40	108J	Force grinder #40	1988
FG41	109J	Force grinder #41	1994
FG42	110J	Force grinder #42	1994
FG43	112G	Force grinder #43	2000
FG44	100E	Force grinder #44	2000
FG45	100E	Force grinder #45	2000
FG46	101E	Force grinder #46	2000
FG47	102E	Force grinder #47	2002
FG48	110J	Force grinder #48	2002
FG49	111J	Force grinder #49	2002
FG50	112J	Force grinder #50	2003
FG51	113J	Force grinder #51	2003
FG52	114J	Force grinder #52	2010
FG53	115J	Force grinder #53	2010
FG54	116J	Force grinder #54	2011
FG55	117J	Force grinder #55	2012
FG56	118J	Force grinder #56	2012
FG57	119J	Force grinder #57	2012
FG58	120J	Force grinder #58	2012

EU	POINT	EU Name / Model	Constr. /Mod. Date
MHG01	100L	Radial runout grinder #1	2017
MHG02	101L	Radial runout grinder #2	2017
MHG03	102L	Radial runout grinder #3	2018
MHG04	103L	Radial runout grinder #4	2018

⁽¹⁾ – Force grinders #1 - #58 (with exception of #15 and #22, which are not installed) are controlled via dust collectors or equivalent PM control equipment with an efficiency of 91.7% or greater.

EUG “GRWSW”: White Sidewall Grinders ⁽¹⁾

EU	POINT	EU Name / Model	Constr. /Mod. Date
FTREPR01	98J	Buffing area #1	1979
FTREPR02	99D	Buffing area #2 Repair area	1979
WG1	99J	WSW grinder #1	1979
WG2	99J	WSW grinder #2	1979
WG3	100J	WSW grinder #3	1979
WG4	100J	WSW grinder #4	1979
WG5	101J	WSW grinder #5	1979
WG6	101J	WSW grinder #6	1979
WG7	102J	WSW grinder #7	1979

⁽¹⁾ – WSW grinders #1 - #7 are controlled via dust collectors or equivalent PM control equipment with an efficiency of 99.9% or greater.

EUG “BLUE”: White Sidewall Paint Machines ⁽¹⁾

EU	POINT	EU Name / Model	Constr. /Mod. Date
WP1	97J	WSW spray line #1	1987
WP2	97J-01	WSW spray line #2	2014
WP3	97J-02	WSW spray line #3	1992
WP4	98J-02	WSW spray line #4	1992
WPW1	97I	Paint collection tote (Serves Lines 1 through 4)	1992
WPW2	97I	Paint collection tote (Serves Lines 1 through 4)	1992

⁽¹⁾ – Each spray line includes drum storage.

EUG “RECYCLE”: Recycling Mills

EU	POINT	EU Name / Model	Constr. /Mod. Date
RCM1	25U	84" material recovery single mill # 1	1979
RCM3	25Vz	84" single mill # 3	1979
RCSC1	24SY	Material recovery cooling area	1979
RCST	25Vz	Material recovery 10" strainer	1979

EUG “B&W”: Babcock & Wilcox Boilers

EU	POINT	EU Name / Model	Heat Input	Constr. /Mod. Date
PHCB1	OSBLDG31A-B	B&W Boiler	122-MMBtu/hr	1979
PHCB2	OSBLDG31A-C	B&W Boiler	122-MMBtu/hr	1979

EUG “KEEL”: Keeler Boiler

EU	POINT	EU Name / Model	Heat Input	Constr. /Mod. Date
PHOB	BLDG31A-D	Keeler Boiler	100-MMBtu/hr (Natural Gas) 92.3-MMBtu/hr (Fuel Oil)	1979

EUG “COOL”: Cooling Towers

EU	POINT	EU Name / Model	Constr. /Mod. Date
CT-01	BLDG 79	30,000 gpm cooling tower	1979
CT-05	CT-05	40,000 gpm cooling tower	2016

EUG “TANK”: Oil/Gasoline Tanks

EU	POINT	EU Name / Model	Constr. /Mod. Date
GRNDTK	OSBLDG72-B	Gasoline/Diesel Split Tank and Fuel Oil Tanks	1979

EUG “ENG-CI-NSPS”: Stationary CI-RICE Subject to NSPS, Subpart IIII

EU	Name/Model	HP	Serial #	Constr. /Mod. Date
EFP-5	Emergency Fire Pump / John Deere JU6H-UFADS8	260	PE6068L278458	12/2015
EFP-6	Emergency Fire Pump / John Deere JU6H-UFADS8	260	PE6068L281743	6/30/16
EFP-7	Emergency Fire Pump / John Deere JW6H-UF48	290	RG6081H177172	12/06
EFP-8	Emergency Fire Pump / John Deere JU6H-UFADS8	260	PE6068N004516	11/30/17
GEN-1	Diesel Backup Generator / Cummins QSX15-G9	755	79450969	12/2010
GEN-2	Diesel Generator / Mitsubishi L3E-W461ML	12	TBD	TBD
GEN-3	Diesel Generator / Mitsubishi L3E-W461ML	12	TBD	TBD
GEN-4	Diesel Generator / Mitsubishi L3E-W461ML	12	TBD	TBD
GEN-5	Diesel Generator / Mitsubishi L3E-W461ML	12	TBD	TBD

EU	Name/Model	HP	Serial #	Constr. /Mod. Date
GEN-6	Diesel Generator / Mitsubishi L3E-W461ML	12	TBD	TBD
GEN-7	Diesel Generator / Mitsubishi L3E-W461ML	12	TBD	TBD
GEN-8	Diesel Generator / Mitsubishi L3E-W461ML	12	TBD	TBD
GEN-9	Diesel Generator / Mitsubishi L3E-W461ML	12	TBD	TBD
GEN-10	Diesel Generator / Mitsubishi L3E-W461ML	12	TBD	TBD
GEN-11	Diesel Backup Generator / Diesel Cummins QSX15-G9	755	TBD	Post-2006

EUG “EBP”: Electron Beam Processing

EU	POINT	EU Name / Model	Constr. /Mod. Date
EBP-1	EBP-1	Electron Beam Processing Unit	2017

EUG “AP”: Apexers

EU	POINT	EU Name / Model	Constr. /Mod. Date
AP01	57K	Apex Extruder #1 (2.75” extruder)	TBD
AP02	58K	Apex Extruder #2 (2.75” extruder)	TBD
AP03	60K	Apex Extruder #3 (2.75” extruder)	TBD
AP04	61K	Apex Extruder #4 (2.75” extruder)	TBD
AP05	63HW	Apex Extruder #5 (2.75” extruder)	TBD
AP06	64HW	Apex Extruder #6 (2.75” extruder)	TBD
AP07	65HW	Apex Extruder #7 (2.75” extruder)	TBD
AP08	66HW	Apex Extruder #8 (2.75” extruder)	TBD
AP09	62SX2	Apex Extruder #9 (2.75” extruder)	TBD
AP10	63SX2	Apex Extruder #10 (2.75” extruder)	TBD
AP11	66SX2	Apex Extruder #11 (2.75” extruder)	TBD
AP12	58BZN	Apex Extruder #12 (3.5” extruder)	TBD

SECTION IX. EMISSIONS

Goodyear Lawton considers the data used to quantify VOC emissions to be confidential. For a majority of the process equipment, hourly and annual emissions are calculated monthly using Rubber Manufacturers Association (RMA) emission factors, rubber throughput, mass balances, and hours of operation. This method is based on engineering and/or chemical equations and has been determined to be acceptable. This same method is required to be used to show compliance with the permit conditions.

Goodyear Lawton has a facility-wide cap on VOC emissions from the manufacturing process instead of limits on individual pieces of manufacturing equipment. The facility-wide cap on VOC emissions from the manufacturing process (including ethanol emissions) is 627 TPY. The facility-wide cap for PM₁₀ emissions from manufacturing processes is 82.73 TPY.

Facility-Wide Emission Limits

EUG	EU Name / Model	VOC ⁽¹⁾ Emissions (TPY)	PM₁₀ Emissions (TPY)
EUG-BB	Banbury Mixers	-	-
EUG-EXT	Extruders 2, 3, 5, 6, 7, 8 and 9	-	-
EUG-EXTNSPS	Extruders 1 and 4	-	-
EUG-GC	Gum Calender 2, 3 & 4	-	-
EUG-FWC	Fabric & Wire Calenders	-	-
EUG-GTS	Non-NSPS Green Tire Spray Booths	-	-
EUG-GTSNSPS	NSPS Green Tire Spray Booths	-	-
EUG-HF	Hot Former	-	-
EUG-STRIPP	Green Tire Stripping	-	-
EUG-CP	Curing Presses	-	-
EUG-GRFVM	Force Variation Machine & Radial Run-out Grinders	-	-
EUG-GRWSW	White Sidewall Grinders	-	-
EUG-BLUE	White Sidewall Machines	-	-
EUG-RECYCLE	Recycling Mills	-	-
Facility-Wide Totals		627	82.73

⁽¹⁾ – Total VOC (includes ethanol).

EUG “B&W”: Babcock & Wilcox Boilers, and
EUG “KEEL”: Keeler Boiler

The boilers were installed in 1979 under Permit No. 77-021-C. The B&W Boilers were initially fired with coal but are no longer permitted to combust coal. The B&W Boilers are rated at 122 MMBtu/hr when fired with natural gas. The Keeler Boiler is fired with natural gas or fuel oil. It is rated at 92.3 MMBtu/hr when fired with fuel oil and 100 MMBtu/hr when fired with natural gas. The boilers are subject to the limits in OAC 252:100-19 for PM, OAC 252:100-31 for SO₂, and OAC 252:100-33 for NO_x. Emission estimates for CO and VOC are based on AP-42 (7/98), Section 1.3 for fuel oil and AP-42 (7-98), Section 1.4 for natural gas, plus a 25% safety factor.

The three boilers all combust natural gas and are included under the units designed to burn gas 1 fuels subcategory under §63.77499(l) of 40 CFR Part 63, Subpart DDDDD. There are no emission limits for the units designed to burn gas 1 fuels subcategory. The Keeler Boiler has not combusted fuel oil since approximately 2006. Should the Keeler Boiler combust fuel oil, it will be included in the units designed to burn liquid subcategory and will be subject to the emission limitations under 40 CFR Part 63, Subpart DDDDD which will take precedence over the limits listed below.

EUG “B&W”: Babcock & Wilcox Boilers Emissions

EU	CO		VOC		NO _x			SO ₂			PM		
	lb/hr	TPY	lb/hr	TPY	lb/MMBtu	lb/hr	TPY	lb/MMBtu	lb/hr	TPY	lb/MMBtu	lb/hr	TPY
Natural Gas													
PHCB1	12.5	54.6	0.8	3.6	0.2	24.4	107	0.2	24.4	107	0.3	36.6	160.3
PHCB2	12.5	54.6	0.8	3.6	0.2	24.4	107	0.2	24.4	107	0.3	36.6	160.3

EUG “KEEL”: Keeler Boiler Emissions

EU	CO		VOC		NO _x			SO ₂			PM		
	lb/hr	TPY	lb/hr	TPY	lb/MMBtu	lb/hr	TPY	lb/MMBtu	lb/hr	TPY	lb/MMBtu	lb/hr	TPY
Fuel Oil													
PHOB	4.1	18.1	0.2	0.9	0.3	27.7	121	0.8	73.8	323	0.4	36.9	161.7
Natural Gas													
PHOB	10.2	44.8	0.7	2.9	0.2	20	88	0.2	20	88	0.4	40	175.2

EUG “COOL”: Cooling Towers

EU	PM TPY
Cooling Tower (CT-01)	7.5
Cooling Tower (CT-05)	7.5

Emissions of NO_x, CO, and PM₁₀ were estimated using manufacturer’s data for engines EFP-5, EFP-6, EFP-7, EFP-8, emission limits from NSPS, Subpart III for GEN-1, AP-42 (10/96), Section 3.3 for engines GEN-2 through GEN-10, and AP-42 (10/96), Section 3.4 for engine GEN-11. For all engines, emissions of VOC and SO₂ were estimated using factors from AP-42 (10/96), Sections 3.3 (for engines 600-hp and less) and 3.4 (for engines greater than 600-hp) using a break-specific fuel consumption rate of 7,000 Btu/hp-hr. To estimate potential to emit (PTE), the mobile parking light engines (GEN-2 through GEN-10) were assumed to operate 8,760 hours per year. All remaining engines were assumed to operate for 500 hours per year at maximum load.

EUG “ENG-CI-NSPS”: Stationary CI-RICE Subject to NSPS, Subpart III

EU	Name/Model	NO _x TPY	CO TPY	VOC TPY	SO ₂ TPY	PM ₁₀ TPY
EFP-5	Emergency Fire Pump / Diesel John Deere JU6H-UFADS8	0.39	0.06	0.16	0.13	<0.01
EFP-6	Emergency Fire Pump / Diesel John Deere JU6H-UFADS8	0.39	0.06	0.16	0.13	<0.01
EFP-7	Emergency Fire Pump / Diesel John Deere JW6H-UF48	0.87	0.08	0.18	0.15	0.02
EFP-8	Emergency Fire Pump / Diesel John Deere JU6H-UFADS8	0.39	0.06	0.16	0.13	<0.01
GEN-1	Diesel Backup Generator / Diesel Cummins QSX15-G9	2.66	1.46	0.12	0.07	0.08
GEN-2	Diesel Generator / Mitsubishi L3E-W461ML	1.65	0.36	0.13	0.11	0.12

EU	Name/Model	NO _x TPY	CO TPY	VOC TPY	SO ₂ TPY	PM ₁₀ TPY
GEN-3	Diesel Generator / Mitsubishi L3E-W461ML	1.65	0.36	0.13	0.11	0.12
GEN-4	Diesel Generator / Mitsubishi L3E-W461ML	1.65	0.36	0.13	0.11	0.12
GEN-5	Diesel Generator / Mitsubishi L3E-W461ML	1.65	0.36	0.13	0.11	0.12
GEN-6	Diesel Generator / Mitsubishi L3E-W461ML	1.65	0.36	0.13	0.11	0.12
GEN-7	Diesel Generator / Mitsubishi L3E-W461ML	1.65	0.36	0.13	0.11	0.12
GEN-8	Diesel Generator / Mitsubishi L3E-W461ML	1.65	0.36	0.13	0.11	0.12
GEN-9	Diesel Generator / Mitsubishi L3E-W461ML	1.65	0.36	0.13	0.11	0.12
GEN-10	Diesel Generator / Mitsubishi L3E-W461ML	1.65	0.36	0.13	0.11	0.12
GEN-11	Diesel Backup Generator / Diesel Cummins QSX15-G9	5.83	1.26	0.46	0.38	0.41
Totals		25.38	6.22	2.41	1.98	1.59

EUG “EBP”: Electron Beam Processing

Ozone emissions from the EBP unit were calculated from manufacturer data for a 500-kV – 170 mA ESP published by the NHV Corporation in January 2014. The amount of ozone generated is determined by the electron energy loss when the electron beam passes through the air path. The ozone generation rate is given in the following formula.

$$Q = 0.11 \text{ kg/kW-hr} * \Delta W$$

Where: ΔW – Energy loss per unit time in the air (kw)
 Q – Ozone generation rate (kg/hr)

The rating of ESP is as follows:

Accelerator voltage: 500 kV

Beam Current: 170 mA

The air path from the window foil to the beam catcher is 15 cm. The energy loss in the air (ΔW) is given in the following formula.

$$\Delta W = E * D * L * I_0, \text{ where:}$$

E – stopping power (1.8 MeV/g/cm² at 500 keV)
 D – Air density (1.293 x 10⁻³ g/cm³)
 L – Air path (15 cm)
 I_0 – Beam current (170 mA)
 $\Delta W = (1.8 \text{ MeV/g/cm}^2)(1.293 \times 10^{-3} \text{ g/cm}^3)(15 \text{ cm})(170 \text{ mA}) = 5.96 \text{ kW}$

Therefore, the potential ozone generation rate for 8,760 hours per year is:

$$\begin{aligned}
 Q &= 0.11 \text{ kg/kW-hr} * 5.96 \text{ kW} \\
 &= 0.66 \text{ kg/hr (approx. 10.93 g/min)} \\
 &= 1.46 \text{ lb/hr} \\
 &= 6.3 \text{ TPY}
 \end{aligned}$$

Insignificant Activities

Emissions associated with insignificant facility activities were confirmed to be insignificant.

Emissions Estimates from Insignificant Activities

EU	CO	VOC	NO _x	SO ₂	PM
	TPY	TPY	TPY	TPY	TPY
CT-02 (Curing Cooling Tower)	--	--	--	--	1.61
CT-04 (Psychrometric Cooling Tower)	--	--	--	--	3.01
Process Oil Tanks	--	0.05	--	--	-
MT01 thru MT34 & CB01 thru CB04 (Carbon Black Storage and Handling)	--	-	--	--	0.2
Slurry Mixing ⁽¹⁾	--	-	--	--	-
Gasoline/Diesel Split Tank and Fuel Oil Tanks	--	0.36	--	--	-
Bead Production	--	0.4	--	--	-
Miscellaneous Solvent Usage ⁽²⁾	--	-	--	--	-
Conicity Grinder and Matteuzzi Grinders	--	0.02	--	--	<0.01
Other Bead Apexers	--	0.14	--	--	1.24
Radial Runout Grinders	--	0.06	--	--	< 0.01
Totals	<0.01	1.03	<0.01	<0.01	6.06

⁽¹⁾ – Emissions are vented in an enclosed building.

⁽²⁾ – VOC emissions are maintained facility-wide and reported in annual emissions inventories.

Hazardous Air Pollutants (HAPs)

Goodyear Lawton is a major source of HAPs. The facility has a PTE of 91 tons per year of total HAPs. HAP emissions were calculated using the potential rubber throughput, annual hours of operation, and RMA emission factors for each hazardous air pollutant. Goodyear did not request an increase in the HAP cap with this permit.

SECTION X. INSIGNIFICANT ACTIVITIES

The insignificant activities identified and justified in the application are duplicated below. Records must be available to confirm the insignificance of the activities. Appropriate record-keeping of activities indicated below with “*” is specified in the Specific Conditions. Any Activity to which a state or federal applicable requirement applies is not insignificant even if it is included on this list. Recordkeeping is not required for those operations, which qualify as trivial activities.

1. Space heaters, boilers, process heaters and emergency flares less than or equal to 5 MMBtu/hr heat input (commercial natural gas). Facility space heaters meet this criterion. The boilers at the Training Center/Gift Shop and the Tire Bladder Curing Center (both Cleaver Brooks rated at 2.5 MMBtu/hr) meet this criterion. Recordkeeping will not be required in the permit.
2. * Emissions from fuel storage/dispensing equipment operated solely for facility-owned vehicles if fuel throughput is not more than 2,175 gallons/day, averaged over a 30-day period.

EU	POINT	EU Name / Model	Capacity (gal.)	Constr./Mod. Date
GRNDTK	OSBLDG72-B	Gasoline/Diesel Split Tank	1,000 gas 500 diesel	1979

The above tank is utilized for fuel storage/dispensing for facility-owned vehicles. Fuel throughput for both gasoline and diesel is below 2,175 gallons/day and is classified as an insignificant activity. The permit will require monthly records of fuel purchases to demonstrate the continued insignificance of these tanks and dispensing operations.

3. * Storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature.

EU	EU Name / Model	Capacity (gal.)	Constr./Mod. Date
UOST-01	Used Oil Storage Tank	2,800	2000
UOST-02	Used Oil Storage Tank	2,800	2000
UOST-03	Used Oil Storage Tank	4,000	2000

The tanks listed above have capacities less than 10,000 gallons and store liquids with a true vapor pressure less than or equal to 1.0 psia. The permit will not require records as the type of liquid stored has a vapor pressure less than 1.0 psia and is not subject to change based on current operations. It should be noted that there was an oil/water separator tank located at the facility previously. That tank was removed on March 8, 2011, and replaced with a complete oil/water separator system. The new system receives effluent water with less than 200 gallons/day VOC and is, therefore, exempt from the requirements of OAC 252:100-37-37.

4. * Emissions from storage tanks constructed with a capacity less than 39,894 gallons which store VOC with a vapor pressure less than 1.5 psia at maximum storage temperature.

EU	Contents	Capacity (gal.)	Constr./Mod. Date
FOST-01	#6 Fuel Oil	15,000	1979
TF 1	Process Oils & Additives	30,000	1979
TF 2	Process Oils & Additives	30,000	1979
TF 3	Process Oils & Additives	30,000	1979
TF 4	Process Oils & Additives	15,000	1979

EU	Contents	Capacity (gal.)	Constr./Mod. Date
TF 5	Process Oils & Additives	15,000	1979
TF 6	Process Oils & Additives	7,500	1979
TF 7	Process Oils & Additives	8,000	2008

The materials stored in the tanks listed above have vapor pressures less than 1.5 psia. The permit requires records of the type of liquid stored and vapor pressure to demonstrate the continued insignificance of these storage tanks.

5. Cold degreasing operations utilizing solvents that are denser than air. These activities are conducted as part of routine maintenance and are considered trivial activities, and recordkeeping will not be required in the permit. The facility ceased using cleaning solvents as of January 1, 2009. After that date, the facility moved to water-based cleaning solutions serviced by Safety-Kleen.
6. Welding and soldering operations utilizing less than 100 pounds of solder and 53 tons per year of electrodes. These activities are conducted as part of routine maintenance and are considered trivial activities; recordkeeping will not be required in the permit.
7. * Non-commercial water washing operations (less than 2,250 barrels/year) and drum crushing operations of empty barrels less than or equal to 55 gallons with less than three percent by volume of residual material. This applies to the Drum Crushing Area at the facility. The permit will require records of the weight of crushed drums disposed monthly to demonstrate the continued insignificance of these activities.
8. Sanitary sewage collection and treatment facilities other than incinerators and Publicly Owned Treatment Works (POTW). Stacks or vents for sanitary sewer plumbing traps are also included (i.e., lift stations).
9. Hazardous waste and hazardous materials drum staging areas. The facility includes a drum storage area for wastes. Recordkeeping will not be required in the permit.
10. Exhaust systems for chemical, paint, and/or solvent storage rooms or cabinets, including hazardous waste satellite (accumulation) areas. The facility includes several chemical storage areas. Recordkeeping will not be required in the permit.
11. Hand wiping and spraying of solvents from containers with less than 1 liter capacity used for spot cleaning and/or degreasing in ozone attainment areas. These activities are conducted as part of routine maintenance and are considered trivial activities, and recordkeeping will not be required in the permit.
12. * Activities that have the potential to emit no more than 5 TPY (actual) of any criteria pollutant. The following activities have been determined to be insignificant based on emissions estimates. Records will be required to be maintained to demonstrate continued insignificance of the specified activity.

A. Miscellaneous Storage Vessels

EU	EU Name / Model	Capacity (gal.)	Constr./Mod. Date
FOST-02	No. 2 Fuel Oil Storage Tank	250,000	1979
AST-01	Sulfuric Acid Storage Tank – Pump Room	1,450	2008
SHST	Sodium Hypochlorite Storage Tank	1,400	2000
AST-02	Sulfuric Acid Storage Tank – Curing Cooling Tower	1,450	1997
AST-03	Hydrochloric Acid Storage Tank – South Extruding	1,350	2003
AST-04	Sulfuric Acid Storage Tank – East Powerhouse	1,450	2010
PST-01	Propane Storage Tank	1,000	1979
PST-02 ⁽¹⁾	Propane Storage Tank	1,000	1979

⁽¹⁾ – Tank is no longer in use but is still present at the site. The cover has been removed.

With the exception of the two propane storage tanks, the permit will require records of the liquid stored and vapor pressure to be maintained. The propane storage tanks are designed to be maintained under pressure and will therefore have minimal emissions.

B. Carbon Black Storage & Handling

EU	EU Name / Model / Description	Constr./Mod. Date
MT01-MT34, CB01-CB04	Various Carbon Black Storage & Handling Emission Points	N/A

The permit will require records of the amount of carbon black used on-site annually.

C. Slurry Mixing

EU	EU Name / Model / Description	Constr./Mod. Date
N/A	Various Slurry Mixing Vats	N/A

The permit will require records of the annual weight of slurry purchased and applicable MSDS.

D. Cooling Towers

EU	EU Name / Model / Description	Construction /Mod. Date
CT-02	Curing Cooling Tower	2000
CT-04	Psychrometric Cooling Tower	1998

The permit will require records of the annual hours of operation and calculation of annual emissions based on the most recent AP-42, Section 13.4 emission factors. Former tower CT-03 is no longer in operation.

- E. Bead Production – (Bead extruders) which have emissions (approximately 0.4 TPY) significantly less than 5 TPY (actual), and recordkeeping will not be required in the permit.
- F. Miscellaneous Solvent Usage – Inclusive of ply and fabric toe production. Solvent usage from plastic containers (less than 1 liter in size) to “un-stick” uncured rubber components (such as “ball-ups”), uncured stock “refreshing”, and similar uses. Emissions associated with solvent usage are maintained facility-wide and reported in annual emissions inventories. Therefore, no additional recordkeeping will be required in the permit.
- G. Matteuzi Grinders (#1 through #8) installed from 2002 through 2015 and Conicity Grinder #1 installed in 2015 represent insignificant activities.

SECTION XI. OKLAHOMA AIR POLLUTION CONTROL RULES

OAC 252:100-1 (General Provisions) [Applicable]
Subchapter 1 includes definitions, but there are no regulatory requirements.

OAC 252:100-2 (Incorporation by Reference) [Applicable]
This subchapter incorporates by reference applicable provisions of Title 40 of the Code of Federal Regulations. These requirements are addressed in the “Federal Regulations” section.

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]
Primary Standards are in Appendix E and Secondary Standards are in Appendix F of the Air Pollution Control Rules. At this time, all of Oklahoma is in attainment of these standards.

OAC 252:100-5 (Registration, Emission Inventory, and Annual Fees) [Applicable]
Subchapter 5 requires sources of air contaminants to register with Air Quality, file emission inventories annually, and pay annual operating fees based upon total annual emissions of regulated pollutants. Emission inventories have been submitted and fees paid for past years.

OAC 252:100-8 (Permits for Part 70 Sources) [Applicable]
Part 5 includes the general administrative requirements for Part 70 permits. Any planned changes in the operation of the facility which result in emissions not authorized in the permit and which exceed the “Insignificant Activities” or “Trivial Activities” thresholds require prior notification to AQD and may require a permit modification or construction permit. Insignificant activities mean individual emission units that are either listed in Appendix I (OAC 252:100) or whose actual calendar year emissions do not exceed the following limits.

- 5 TPY of any one criteria pollutant
- 2 TPY of any one HAP or 5 TPY of multiple HAPs or 20% of any threshold less than 10 TPY for a single HAP that the EPA may establish by rule

Emission limitations and operational requirements necessary to assure compliance with all applicable requirements for all sources are taken from previous construction and operating permits, and/or are developed from the applicable requirement. The requirements of Subchapter 8 have been incorporated into the Major Source Standard Conditions of the permit

Section 8-4 requires a construction permit prior to the following:

- Construction of a new source that would require an operating permit under 40 CFR Part 70;
- Reconstruction of a major HAP source under 40 CFR Part 63;
- Any physical change or change in method of operation that would be a significant modification under OAC 252:100-8-7.2(b)(2); or
- Any physical change or change in method of operation that would increase the PTE of any one regulated air pollutant by more than 10 TPY, calculated using the approach in 40 CFR § 49.153(b).

The requested modifications are physical changes or changes in method of operation that would be significant modifications under OAC 252:100-8-7.2(b)(2). Therefore, the facility applied for this construction permit. In addition to the requirements of Part 5, sources subject to Part 7 or Part 9 of OAC 252:100-8 must also meet the applicable requirements contained therein. The BACT and modeling requirements of Part 5 will be met by the BACT and modeling requirements of Part 7.

Part 7 incorporates the Prevention of Significant Deterioration requirements that apply to the construction of any new major stationary source or any project that is a major modification at an existing major stationary source in an area designated as attainment or unclassifiable. This facility is an existing major source under this Part. The application for this proposed project is considered a major modification under this part (see the discussion under Section V of this Permit Memorandum). Therefore, a BACT analysis (see Section VI of this Permit Memorandum) and air quality impacts analysis (see Section VII of this Permit Memorandum) are required.

Part 9 incorporates requirements that apply to the construction of any new major stationary source or major modification which would locate in or affect a nonattainment area located in Oklahoma. At this time, all of Oklahoma is in Attainment. Therefore, this part does not apply.

OAC 252:100-9 (Excess Emission Reporting Requirements) [Applicable]
Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emission event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event. Request for mitigation, as described in OAC 252:100-9-8, shall be included in the excess emission event report. Additional reporting may be required in the case of ongoing emission events and in the case of excess emissions reporting required by 40 CFR Parts 60, 61, or 63.

OAC 252:100-13 (Open Burning) [Applicable]
Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in this subchapter.

OAC 252:100-19 (Particulate Matter) [Applicable]
Section 19-4 regulates emissions of PM from new and existing fuel-burning equipment, with emission limits based on maximum design heat input rating. Fuel-burning equipment is defined in OAC 252:100-19 as any internal combustion engine or gas turbine, or other combustion device used to convert the combustion of fuel into usable energy. Thus, the engines, boilers, and heaters located at this facility are subject to the requirements of this section.

Appendix C of OAC 252:100 specifies a PM emission limitation of 0.60 lbs/MMBtu for all equipment at this facility with a heat input rating of 10 MMBtu/hr or less. The insignificant space heaters, insignificant Cleaver Brooks boilers at the Training Center/Gift Shop and the Tire Bladder Curing Center, and compression ignition engines on-site all have a maximum heat input of less than 10 MMBtu/hr and are subject to the 0.60 lb/MMBtu limit. AP-42 (10/96), Table 3.3-1 lists an uncontrolled PM₁₀ emission factor of 0.31 lb/MMBtu for diesel engines with power ratings up to 600 horsepower. AP-42 (10/96), Table 3.4-1 lists an uncontrolled PM emission factor of 0.1 lb/MMBtu for diesel engines with power ratings greater than 600 horsepower and AP-42 (10/96), Table 3.4-2 lists an uncontrolled total PM₁₀ emission factor of 0.0573 lb/MMBtu. AP-42 (7/98), Table 1.4-2 lists an uncontrolled PM emission factor of 7.6 lb/10⁶ scf (approximately 0.007 lb/MMBtu) for natural gas combustion. Therefore, these sources are in compliance with the 0.60 lb/MMBtu limit.

Appendix C of OAC 252:100 also specifies a PM emission limitation for all equipment at this facility with a heat input rating of greater than 10 MMBtu/hr but less than 1,000 MMBtu/hr based on the following calculation: $E = 1.0428080X^{-0.238561}$, where E is the allowable emission rate (lb/MMBtu), and X is the maximum heat input (MMBtu/hr). The Babcock & Wilcox Boilers (each rated at 122 MMBtu/hr fired with natural gas) and Keeler Boiler (rated at 92.3 MMBtu/hr when fired with fuel oil and 100 MMBtu/hr when fired with natural gas) all have a maximum heat input between 10 MMBtu/hr and 1,000 MMBtu/hr. The Babcock & Wilcox Boilers are each limited to PM emissions of 0.331 lb/MMBtu. The Keeler Boiler is limited to 0.354 lb/MMBtu when burning fuel oil and 0.347 lb/MMBtu when burning natural gas. AP-42 (7/98), Table 1.4-2 lists an uncontrolled total PM emission factor of 7.6 lb/10⁶ scf (approximately 0.007 lb/MMBtu) for natural gas combustion. AP-42 (5/10), Table 1.3-1 lists a filterable PM emission factor of $9.19(S) + 3.22$ (in units of lb/10³ gal), where S is the sulfur content (wt.%) in the oil. Back calculating the maximum sulfur content from the calculated emission limit from Appendix C of OAC 252:100 using the AP-42, Table 1.3-1 PM emission factor equation and assuming a fuel oil heat content of 140 MMBtu/10³ gal yields a maximum allowable sulfur content of 5.0 wt.%. Furthermore, taking the OAC 252:100-31-25 sulfur limit for liquid fuels of 0.8 lb/MMBtu, assuming a heat content of 150 MMBtu/10³ gal, and a fuel oil density of 8.1 lb/gal is equivalent to a sulfur content of approximately 0.74 wt.%. Past Full Compliance Evaluations indicate the Keeler Boiler has not been fired with fuel oil since 2006. Therefore, these sources will continue to operate in compliance with the calculated PM emission limits of OAC 252:100, Appendix C.

Section 19-12 limits emissions of particulate matter from industrial processes and direct-fired fuel-burning equipment based on their process weight rates. Appendix G of OAC 252:100 specifies a PM emission limitation for all processes with process weight rates of 30 tons per hour or less based on the following calculation: $E = 4.10P^{0.67}$, where E is the allowable emission rate (lb/hr) and P is the process weight rate (tons per hour). Appendix G of OAC 252:100 specifies a PM emission limitation for all processes with process weight rates of greater than 30 tons per hour based on the following calculation: $E = (55.00P^{0.11}) - 40$, where E is the allowable emission rate (lb/hr) and P is the process weight rate (tons per hour). The PM emission rates for industrial processes provided in past emission inventories are much less than the allowable PM emission rates calculated from Appendix G of OAC 252:100. All points are in compliance with Subchapter 19. Many of these industrial processes rely on various control equipment to reduce emissions of PM. Therefore, inspection and monitoring requirements for the PM control equipment have been incorporated into the permit.

OAC 252:100-25 (Visible Emissions and Particulates) [Applicable]

No discharge of greater than 20% opacity is allowed except for short-term occurrences that consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity. When burning natural gas, the boilers are not expected to exceed the opacity limits of this subchapter and specific conditions are not required. Specific requirements have been established for the Keeler Boiler if it fires fuel oil.

OAC 252:100-29 (Fugitive Dust) [Applicable]

Subchapter 29 prohibits the handling, transportation, or disposition of any substance likely to become airborne or windborne without taking “reasonable precautions” to minimize emissions of fugitive dust. No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or to interfere with the maintenance of air quality standards. Solids handling operations are conducted in enclosed operations, with most discharges vented to baghouses. Under normal operating conditions, this facility will not cause a problem in this area; therefore, it is not necessary to require any additional specific precautions to be taken.

OAC 252:100-31 (Sulfur Compounds) [Applicable]

Part 2, Section 31-7 limits the ambient air concentration of hydrogen sulfide (H₂S) emissions from any facility to 0.2 ppm at standard conditions (24-hour average), which is equivalent to 283 µg/m³. Fuel-burning equipment fired with pipeline natural gas (as defined under 40 CFR §72.2) and fuel oil will not have the potential to exceed the H₂S ambient air concentration limit.

Part 5, Section 31-25 limits sulfur dioxide emissions from new equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/MMBtu heat input averaged over 3 hours; for liquid fuels, the limit is 0.8 lb/MMBtu heat input averaged over 3 hours. The gas fuel limit is equivalent to approximately 0.2 weight percent sulfur in the fuel gas, which is equivalent to 2,000 ppmw sulfur. For combustion units burning gas, the permit requires the use of pipeline natural gas (as defined under 40 CFR §72.2) to a limit of 0.5 grains of total reduced sulfur (TRS) per 100 scf (approximately 8.5 ppm). The diesel-fired engines are limited to firing low sulfur diesel with a

sulfur content of 15 ppmw. Based on a diesel heat content of 140 MMBtu/10³ gal and a diesel density of 7.09 lb/gal, this is equivalent to an emission rate of 0.00076 lb/MMBtu and is in compliance with the 0.8 lb/MMBtu limit. In addition to combusting natural gas, the Keeler Boiler is permitted to combust fuel oil. Specific conditions have been incorporated into the permit which limits the Keeler Boiler to 0.8 lb/MMBtu when firing fuel oil.

OAC 252:100-33 (Nitrogen Oxides)

[Applicable]

This subchapter applies to stationary sources that are fuel burning equipment, constructed, altered, replaced, or rebuilt after February 14, 1972, with a rated heat input greater than or equal to 50 MMBtu/hr. The Babcock & Wilcox Boilers (each rated at 122 MMBtu/hr fired with natural gas) and Keeler Boiler (rated at 92.3 MMBtu/hr when fired with fuel oil and 100 MMBtu/hr when fired with natural gas) all have rated heat inputs greater than or equal to 50 MMBtu/hr, were constructed after February 14, 1972, and are subject to the requirements of this subchapter. Under this subchapter, emissions of NO_x from any new fuel-burning equipment are limited as follows: gas-fired fuel-burning equipment shall not exceed 0.20 lb/MMBtu heat input, three-hour average, liquid-fired fuel-burning equipment shall not exceed 0.30 lb/MMBtu heat input, three-hour average, and solid fossil fuel-burning equipment shall not exceed 0.70 lb/MMBtu heat input, three-hour average.

The B&W Boilers are permitted to combust natural gas. The Keeler Boiler is permitted to combust natural gas or fuel oil. Specific conditions have been incorporated into the permit which limits these units to 0.20 lb/MMBtu when fired with natural gas and 0.30 lb/MMBtu when firing fuel oil.

OAC 252:100-35 (Carbon Monoxide)

[Not Applicable]

None of the affected sources are associated with this project: gray iron cupola, blast furnace, basic oxygen furnace, petroleum catalytic cracking unit, or petroleum catalytic reforming unit.

OAC 252:100-37 (Volatile Organic Compounds)

[Applicable]

Part 3, Section 37-15 requires VOC storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. With the exception of the Gasoline/Diesel split tank, the tanks at the facility store materials that have a vapor pressure less than 1.5 psia. The diesel section of the Gasoline/Diesel split tank stores diesel with a vapor pressure less than 1.5 psia. The gasoline section of the Gasoline/Diesel split tank is equipped with a permanent submerged fill pipe and is in compliance with this requirement.

Part 5, Section 37-25 limits the VOC content of coatings used in coating lines or operations. The coatings used in the equipment identified in EUG GTS (Non-NSPS Green Tire Spray Booths), EUG-GTSNSPS (NSPS Green Tire Spray Booths), and EUG-BLUE (White Sidewall Machines) do not meet the definition of acrylic, alkyd primer, custom products finish, epoxy, maintenance finish, nitrocellulose (NC) lacquer, or vinyl as defined under OAC 252:100-37-2. Therefore, the facility is not subject to the VOC emission standards listed under OAC 252:100-37-25(a). This facility is not expected to conduct any other painting with the exception for occasional maintenance as necessary. Any other painting operation will involve maintenance coating of buildings and equipment and emit less than 100 pounds per 24-hr day of VOCs and is exempt.

Part 7, Section 37-36 requires fuel-burning and refuse-burning equipment to be cleaned, operated, and maintained to minimize emissions of VOC. Based on manufacturer's data and good engineering practice, the equipment must not be overloaded and temperature and available air must be sufficient to provide essentially complete combustion.

OAC 252:100-42 (Toxic Air Contaminants (TAC)) [Applicable]
 This subchapter regulates TAC that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC, shall be retained, unless a modification is approved by the Director. Since no AOC has been designated there are no specific requirements for this facility at this time.

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping) [Applicable]
 This subchapter provides general requirements for testing, monitoring, and recordkeeping and applies to any testing, monitoring, or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain, and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

The following Oklahoma Air Pollution Control Rules are not applicable to this facility:

OAC 252:100-11	Alternative Emissions Reduction	not requested
OAC 252:100-17	Incinerators	not type of emission unit
OAC 252:100-21	Wood-Waste Burning Equipment	not type of emission unit
OAC 252:100-23	Cotton Gins	not type of emission unit
OAC 252:100-24	Grain Elevators	not in source category
OAC 252:100-35	Carbon Monoxide	not type of emission unit
OAC 252:100-39	Nonattainment Areas	not in area category
OAC 252:100-47	Landfills	not in source category

SECTION XII. FEDERAL REGULATIONS

PSD, 40 CFR Part 52 [Applicable]
 The facility is an existing major source under PSD. A PSD analysis is required when an existing major source increases emissions by significant amounts (after netting, etc.). The significant emissions rates (TPY) of each pollutant in question is shown in the following table. Any increases

must be evaluated in the context of PSD significance levels: 100 TPY CO, 40 TPY NO_x, 40 TPY SO₂, 25 TPY PM, 15 TPY PM₁₀, 10 TPY PM_{2.5}, 40 TPY VOC, 0.6 TPY lead, 3 TPY fluorides, 7 TPY Sulfuric Acid Mist, 10 TPY H₂S, 10 TPY Total Reduced Sulfur, or 75,000 TPY CO₂-equivalent. A PSD applicability analysis for the proposed project was conducted and was determined to be significant, and therefore subject to the PSD permitting process. A BACT analysis and impacts analyses have been conducted as discussed previously.

NSPS, 40 CFR Part 60

[Subparts A, BBB, IIII Applicable]

Subpart A, General Provisions. This subpart sets forth general requirements for equipment subject to NSPS. Any physical or operational change to an NSPS affected source requires submittal of initial notification and recordkeeping. In addition, initial performance tests required under each applicable subpart are to be performed within 60 days of achieving maximum production rate and no later than 180 days after initial startup. The DEQ must be notified within 30 days prior to any initial performance test and must receive those results. Goodyear Lawton will comply with requirements set forth in Subpart A.

Subpart Db, Industrial-Commercial-Institutional Steam Generating Units. This subpart affects steam generating units with a design heat input capacity greater than 100 MMBtu/hr and which commenced construction, modification, or reconstruction after June 19, 1984. The two Babcock and Wilcox Boilers each have a design heat input capacity greater than 100 MMBtu/hr but were constructed in 1979 and have not been modified or reconstructed since. Therefore, the Babcock and Wilcox Boilers are not subject to this subpart. The Keeler Boiler has a design heat input capacity of 100 MMBtu/hr or less; therefore, the Keeler Boiler is not subject to this subpart.

Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units. This subpart affects steam generating units constructed after June 9, 1989, with a design heat input capacity of 100 MMBtu/hr or less, but greater than 10 MMBtu/hr. The two Babcock and Wilcox Boilers each have a design heat input capacity greater than 100 MMBtu/hr; therefore, the Babcock and Wilcox Boilers are not subject to this subpart. The Keeler Boiler has a design heat input capacity of 100 MMBtu/hr or less, but greater than 10 MMBtu/hr; however, it was constructed in 1979 and has not been modified or reconstructed since. Therefore, the Keeler Boiler is not subject to this subpart.

Subpart BBB, Rubber Tire Manufacturing Industry. This subpart applies to each undertread cementing operation, each sidewall cementing operation, each tread end cementing operation, each bead cementing operation, each green tire spraying operation, each Michelin-A operation, each Michelin-B operation, and each Michelin-C automatic operation that commence construction, modification, or reconstruction after January 20, 1983. The facility contains the following affected facilities subject to Subpart BBB for which the permit requires compliance:

- A. Tread end cementing operations at Extruder Lines #1, and #4.
- B. Green tire spraying operations at Paint Lines #1, #2, #7, and #8.

The new green tire spray booths and associated equipment are expected to be subject to the requirements of Subpart BBB. The permit requires the new green tire spray booths to comply with the requirements of Subpart BBB and to keep appropriate documentation to demonstrate compliance with the requirements of Subpart BBB.

Subpart IIII, Stationary Compression Ignition Internal Combustion Engines (CI-ICE). This subpart affects stationary CI-ICE based on power and displacement ratings, depending on date of construction, beginning with those constructed after July 11, 2005, and manufactured after April 1, 2006, or engines reconstructed after July 11, 2005. The four (4) fire pump engines, two (2) backup generator engines, and nine (9) parking lot generators were all manufactured after the applicability dates and are subject to this subpart.

Fire pump engines with a displacement of less than 30 liters per cylinder are subject to the emissions requirements of Table 4 of Subpart IIII per, §60.4205(c). EFP-5, EFP-6 EFP-7, and EFP-8 are considered fire pump engines with a displacement of less than 30 liters per cylinder and are required to comply with the emissions standards of Table 4 of Subpart IIII.

Pre-2007 model year emergency stationary CI ICE with a displacement of less than 10 liters per cylinder that are not fire pump engines must comply with the emission standards in Table 1 of NSPS Subpart IIII, per §60.4205(a). 2007 model year emergency stationary CI ICE with a displacement of less than 30 liters per cylinder that are not fire pump engines are required to comply with the emission standards for new nonroad CI engines in §60.4202, per §60.4205(b).

Per §60.4202(a), 2007 model year and later emergency stationary CI ICE with a maximum engine power less than or equal to 3,000-hp and a displacement of less than 10 liters per cylinder that are not fire pump engines must be certified as follows: per §60.4202(a)(1), engine with a maximum engine power less than 50-hp must be certified to comply with the Tier 2 emission standards emissions standards for new nonroad CI engines for the appropriate rated power as described in 40 CFR Part 1039, Appendix I, for all pollutants and the smoke standards as specified in 40 CFR §1039.105 for model year 2007 engines, and the certification emission standards for new nonroad CI engines in 40 CFR §§1039.104, 1039.105, 1039.107, 1039.115, and Table 2 of NSPS Subpart IIII, for 2008 model year and later engines; per §60.4202(a)(2), engines with a power greater than or equal to 50-hp must be certified to comply with the Tier 2 or Tier 3 emissions standards for new nonroad CI engines for the same rated power as described in 40 CFR Part 1039, Appendix I, for all pollutants and the smoke standards as specified in 40 CFR §1039.105 beginning in model year 2007.

GEN-1 was manufactured in 2010 and is therefore required to be certified to the requirements specified in §60.4202(a)(2). The manufacture date of GEN-11 is unclear at this time but is required to comply with the applicable emissions standards of Table 1 of NSPS Subpart IIII or be certified to the requirements of §60.4202(a)(2), as applicable based on engine model year.

The manufacture dates of GEN-2 though GEN-10 is unclear at this time. Should these engines be operated as allowed under §60.4211(f), these engines are required to comply required to comply with the applicable emissions standards of Table 1 of NSPS Subpart IIII or be certified to the requirements of §60.4202(a)(2), as applicable based on engine model year. However, should these engines not be operated as allowed under §4211(f), these engines will be required to comply with emissions standards for non-emergency engines per §60.4204(a) or 60.4204(b), as applicable based on engine model year.

§60.4207 requires engines with a displacement of less than 30 liters that use diesel fuel to meet the diesel fuel requirements of 40 CFR §1090.305 for nonroad diesel fuel, which requires use of low-sulfur diesel fuel with a maximum sulfur content of 15 ppmw. The permit requires that the permittee comply with all applicable requirements of this subpart.

Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines (SI-ICE), promulgates emission standards for all new SI engines ordered after June 12, 2006, and all SI engines modified or reconstructed after June 12, 2006, regardless of size. The specific emission standards (either in g/hp-hr or as a concentration limit) vary based on engine class, engine power rating, lean-burn or rich-burn, fuel type, duty (emergency or non-emergency), and numerous manufacture dates. Engine manufacturers are required to certify certain engines to meet the emission standards and may voluntarily certify other engines. There are no SI-ICE engines located at the facility.

NESHAP, 40 CFR Part 61

[Not Applicable]

There are no emissions of any of the regulated pollutants: arsenic, asbestos, benzene, beryllium, coke oven emissions, mercury, radionuclides or vinyl chloride except for trace amounts of benzene. Subpart J (Equipment Leaks of Benzene) concerns only process streams which contain more than 10% benzene by weight. All streams at Goodyear Lawton are less than 1% benzene by weight.

NESHAP, 40 CFR Part 63

[Subparts XXXX, ZZZZ, and DDDDD Applicable]

Subpart R, Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations). A bulk gasoline terminal is defined as any gasoline facility which receives gasoline by pipeline, ship or barge, and has a gasoline throughput greater than 75,700 liters (approximately 20,000 gallons) per day. A pipeline breakout station is defined as a facility along a pipeline containing pipeline containing storage vessels used to relieve surges or receive and store gasoline from the pipeline or reinjection and continued transportation by pipeline or to other facilities. The facility does not receive gasoline by pipeline, ship, or barge. Additionally, facility records indicate total facility throughput is less than 20,000 gallons per day. Therefore, the facility is not considered a bulk gasoline terminal or a pipeline breakout station and is therefore not subject to this subpart.

Subpart XXXX, Rubber Tire Manufacturing. This subpart establishes emission standards for HAPs from rubber tire manufacturing, which includes the production of rubber tires and/or the production of components integral to rubber tires, the production of tire cord, and the application of puncture sealant. Components of rubber tires include, but are not limited to, rubber compounds, sidewalls, tread, tire beads, tire cord and liners, that is located at or is part of a major source of HAP. This facility is a major source of HAP emissions. New or reconstructed sources, which began construction after October 18, 2000, must comply with this subpart upon startup. Existing sources must comply no later than July 11, 2005. Rubber tire manufacturing includes the production of rubber tires, the production of tire cord, and the application of puncture sealant. Affected tire production sources include processes or equipment that use or process cements or solvents. Affected tire cord production sources is the collection of all processes engaged in the production of tire cord including, but not limited to, dipping operations, drying ovens, heat-set ovens, bulk storage tanks, mixing facilities, general facility vents, air pollution control devices, and warehouse storage vents. Affected puncture sealant application sources is the puncture sealant

application booth operation used to apply puncture sealant to finished tires. Affected rubber processing sources is the collection of all rubber mixing processes (e.g., Banburys and associated drop mills) that either mix compound or warm rubber compound before the compound is processed into components of rubber tires and includes the mixed rubber compound itself. The facility contains the following affected facilities subject to Subpart XXXX for which the permit will require compliance:

- A. Mixed rubber compound non-stick coating (slurry dip),
- B. Tread striping operations at Extruder lines,
- C. Tread end cementing operations at Extruder lines,
- D. Green tire stripping operations,
- E. Uncured rubber tire component refreshing,
- F. Curing bladder release agent,
- G. Tire mold lubricant (swab),
- H. White sidewall protective coating,
- I. Inspector and classifier identification stamp,
- J. Cured tire repair operations,
- K. Bead lubricants for tire inspection and grinding operations, and
- L. Tire quality markings (harmonic dot, etc.)

As demonstration of compliance, 40 CFR §63.5996 requires the owner or operator of each source complying with either the purchase alternative or the monthly average alternative to demonstrate that no cements and solvents were purchased and used at the affected source that contain HAPs in the amounts above those established in 40 CFR §63.5985(a) and 40 CFR §63.5985(b), respectively.

1. Purchase alternative: Use only cements and solvents that, as purchased, contain less than 2 lb HAP/ton of cement or solvent for HAP listed in Table 16 of this subpart, and less than 20 lb HAP/ton of cement or solvent for all other HAP. [40 CFR §63.5985(a)]
2. Monthly average alternative:
 - a. Option 1: Use cements and solvents such that monthly average emissions of HAP listed in Table 16 of this subpart are less than 2 lb HAP/ton of cement or solvent, and less than 20 lb HAP/ton of cement or solvent for all other HAP. [40 CFR 63.5985(b)]
 - b. Option 2: Use cements and solvents such that monthly average emissions of HAP are less than 0.00005 lb HAP/ton of rubber used at the tire production affected source. [40 CFR §63.5985(b)]

Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE). This subpart affects any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions. Per § 63.6590(c) Owners and operators of the following new or reconstructed RICE must meet the requirements of Subpart ZZZZ by complying with either 40 CFR Part 60 Subpart IIII (for CI engines) or 40 CFR Part 60 Subpart JJJJ (for SI engines):

- 1) Stationary RICE located at an area source;
- 2) The following Stationary RICE located at a major source of HAP emissions:
 - i) 2SLB and 4SRB stationary RICE with a site rating of ≤ 500 brake HP;
 - ii) 4SLB stationary RICE with a site rating of < 250 brake HP;

- iii) Stationary RICE with a site rating of ≤ 500 brake HP which combust landfill or digester gas equivalent to 10% or more of the gross heat input on an annual basis;
- iv) Emergency or limited use stationary RICE with a site rating of ≤ 500 brake HP; and
- v) CI stationary RICE with a site rating of ≤ 500 brake HP.

No further requirements apply for engines subject to NSPS under this part. Based on emissions calculations, this facility is a major source of HAP. The fire pump engines (EFP-5 through EFP-8) and the parking lot generator engines (GEN-2 through GEN-10) will be required to comply with Subpart ZZZZ by complying with NSPS 40 CFR Part 60, Subpart III. GEN-1 and GEN-11 are considered new emergency stationary RICE with a site rating of greater than 500 hp located at a major source of HAP emissions. Per §63.6590(b)(1), new or reconstructed emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions do not have to meet the requirements of Subpart ZZZZ or 40 CR Part 63, Subpart A, except for the initial notification requirements of §63.6645(f). Therefore, GEN-1 and GEN-11 are not subject to the emissions limitations or operating limitations of Subpart ZZZZ. The permit includes the requirement to comply with all applicable requirements of this subpart.

Subpart DDDDD, Industrial, Commercial and Institutional Boilers and Process Heaters. This subpart emissions limitations, work practice standards, and operating limits and affects new, reconstructed, and existing boilers and process heaters located at facilities considered major sources of HAPs. A unit is considered new or reconstructed if construction or reconstruction, respectively, is commenced after June 4, 2010. A unit is considered existing if it is not new or reconstructed. The two (2) B&W Boilers and the one (1) Keeler Boiler were constructed before June 4, 2010, and have not been reconstructed since. Therefore, these boilers are considered existing boilers under this subpart. For existing sources, the compliance date for the rule was January 31, 2016. The B&W Boilers combust natural gas. The Keeler Boiler combusts natural gas and is also capable of burning fuel oil, if necessary. The Keeler Boiler has not combusted fuel oil since approximately 2006. Therefore, the three boilers are included under the units designed to burn gas 1 fuels subcategory under §63.7499(l).

The unit(s) designed to burn gas 1 subcategory includes any boiler or process heater that burns only natural gas, refinery gas, and/or other gas 1 fuels. Per §63.7540, boilers and process heaters in the units designed to burn gas 1 fuels subcategory must conduct tune-ups as a work practice for all regulated emissions under Subpart DDDDD as indicated, and is summarized below:

Heat Input Capacity	Tune-up
≤ 5 MMBtu/hr	Every 5 years
> 5 MMBtu/hr and < 10 MMBtu/hr	Every 2 years
> 10 MMBtu/hr without O ₂ Trim System	Annually
> 10 MMBtu/hr with O ₂ Trim System	Every 5 years
Limited Use	Every 5 years

Per §63.7500(e), boilers and process heaters in the units designed to burn gas 1 fuels subcategory are not subject to the emission limits in Tables 1 and 2 or 11 through 13 of Subpart DDDDD, or the operating limits in Table 4 of Subpart DDDDD, but are subject to work practice standards and notification, reporting, and recordkeeping requirements under this subpart.

Existing boilers and process heaters located at a major source facility, not including limited use units must have a one-time energy assessment performed by a qualified energy assessor. The boilers and process heaters subject to this subpart are shown in the table below.

EU	Description	Heat Capacity (MMBtu/hr)	Installed Date
PHCB1	B&W Boiler	122	1979
PHCB2	B&W Boiler	122	1979
PHOB	Keeler Boiler	100 (Natural Gas) 92.3 (Fuel Oil)	1979

All of these units are existing sources in the unit designed to burn gas 1 subcategory and are rated greater than 10 MMBTUH. These affected units were required to conduct the initial tune-up and energy assessment by January 31, 2016. Since none of these EU have federally enforceable annual capacity factors, they are not considered limited use boilers or process heaters.

Should the Keeler Boiler combust liquid fuel for more than 48 hours during a calendar year, the boiler would no longer be considered as a unit designed to burn gas 1 subcategory as defined under Subpart DDDDD and would be required to meet the requirements associated with a unit designed to burn liquid subcategory, as applicable. Liquid fuel includes, but is not limited to, light liquid, heavy liquid, any form of liquid fuel derived from petroleum, used oil, liquid biofuels, biodiesel, and vegetable oil. Goodyear will continue to comply with the requirements of Subpart DDDDD.

Subpart BBBBBB, Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. This subpart applies to area sources that are bulk gasoline terminals or pipeline breakout stations (either of which that are not subject to the control requirements of 40 CFR Part 63, Subpart R), pipeline pumping stations, and bulk gasoline plants. This subpart is not applicable because the facility is a major source of HAPs.

Subpart CCCCCC, Gasoline Dispensing Facilities. This subpart establishes emission limitations and management practices for HAP emitted from the loading of gasoline storage tanks at gasoline dispensing facilities (GDF) located at an area source. This subpart is not applicable because the facility is a major source of HAPs.

Compliance Assurance Monitoring, 40 CFR Part 64 [Applicable]
 Compliance Assurance Monitoring (CAM), as published in the Federal Register on October 22, 1997, applies to any pollutant-specific emission unit at a major source that is required to obtain a Title V permit, if it meets all of the following criteria:

- It is subject to an emission limit or standard for an applicable regulated air pollutant,
- It uses a control device to achieve compliance with the applicable emission limit or standard, and
- It has potential emissions, prior to the control device, of the applicable regulated air pollutant equal to or greater than major source thresholds (e.g., 100 TPY).

Banbury Mixers #5, #6, and #7 have potential emissions, prior to any control device, of greater than 100 TPY. Therefore, CAM is applicable to these sources. These sources are controlled by the RTOs. Compliance assurance monitoring requirements for the RTOs were incorporated in Permit No. 2011-0440-TVR, issued on October 20, 2016.

Chemical Accident Prevention Provisions, 40 CFR Part 68 [Not Applicable]
This facility does not process or store more than the threshold quantity of any regulated substance (Section 112r of the Clean Air Act 1990 Amendments). More information on this federal program is available on the web page: www.epa.gov/rmp.

Stratospheric Ozone Protection, 40 CFR Part 82 [Subparts A and F are Applicable]
These standards require phase out of Class I & II substances, reductions of emissions of Class I & II substances to the lowest achievable level in all use sectors, and banning use of nonessential products containing ozone-depleting substances (Subparts A & C); control servicing of motor vehicle air conditioners (Subpart B); require Federal agencies to adopt procurement regulations which meet phase out requirements and which maximize the substitution of safe alternatives to Class I and Class II substances (Subpart D); require warning labels on products made with or containing Class I or II substances (Subpart E); maximize the use of recycling and recovery upon disposal (Subpart F); require producers to identify substitutes for ozone-depleting compounds under the Significant New Alternatives Program (Subpart G); and reduce the emissions of halons (Subpart H).

Subpart A identifies ozone-depleting substances and divides them into two classes. Class I controlled substances are divided into seven groups; the chemicals typically used by the manufacturing industry include carbon tetrachloride (Class I, Group IV) and methyl chloroform (Class I, Group V). A complete phase-out of production of Class I substances is required by January 1, 2000 (January 1, 2002, for methyl chloroform). Class II chemicals, which are hydrochlorofluorocarbons (HCFCs), are generally seen as interim substitutes for Class I CFCs. Class II substances consist of 33 HCFCs. A complete phase-out of Class II substances, scheduled in phases starting by 2002, is required by January 1, 2030.

Subpart F requires that any persons servicing, maintaining, or repairing appliances except for motor vehicle air conditioners; persons disposing of appliances, including motor vehicle air conditioners; refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment comply with the standards for recycling and emissions reduction.

The Standard Conditions of the permit address the requirements specified at §82.156 for persons opening appliances for maintenance, service, repair, or disposal; §82.158 for equipment used during the maintenance, service, repair, or disposal of appliances; §82.161 for certification by an approved technician certification program of persons performing maintenance, service, repair, or disposal of appliances; §82.166 for recordkeeping; § 82.158 for leak repair requirements; and §82.166 for refrigerant purchase records for appliances normally containing 50 or more pounds of refrigerant.

This facility does not utilize any Class I & II substances in the manufacturing process.

SECTION XIII. COMPLIANCE

The Specific Conditions of this permit contain various testing, monitoring, recordkeeping, and reporting requirements in order to document on-going compliance with emission limits. The specific method used to document compliance was based on the type of emission unit, the type of process equipment, the specific pollutants emitted, and the amount of permitted emissions taking into account other regulatory requirements that an emission unit may be subject to.

In addition to the permitting requirements, the following periodic inspections were conducted since issuance of the last Title V renewal operating permit.

Inspection Type	Date	Summary/Results
Full Compliance Evaluation	05/26/2016	Two violations were identified. 1) Records for the fire pump engines did not indicate that oil was changed or that belts, hoses, and air cleaners were checked as required per NESHAP Subpart ZZZZ. 2) A deviation was noted in the Annual Compliance Certifications (ACCs) and Semi-Annual Reports (SARs) which involved the malfunction of the motor associated with a dust collector and was considered a failure to operate the required control devices at the required deficiency. This resulted in Enforcement ID 8596 which was opened on December 6, 2016. The facility submitted an alternative enforcement letter which requested a compliance plan. The compliance plan was approved, and the enforcement case was closed on February 22, 2017.
Self-Disclosure	12/7/2016	The facility submitted a self-disclosure and a permit application identifying that an emergency fire-pump engine swap was made without the proper permit modification application. The permit application was assigned as 2011-0440-TVR (M-4). Enforcement Case 8607 was opened on January 3, 2017. Submittal of the permit application was determined to resolve any compliance concerns. The enforcement case was closed on March 1, 2017.
Full Compliance Evaluation	02/02/2018	One violation was identified. The inspection identified that Goodyear did not perform weekly inspections of the facility RTOs as required by Specific Conditions No. 7(f) and 11(q). Enforcement Case 9175 was opened on May 23, 2018. Based on the information submitted with the self-disclosure, it was determined no further facility action was necessary. The enforcement case was closed on July 13, 2018.

Inspection Type	Date	Summary/Results
Self-Disclosure	08/20/2018	The facility submitted a self-disclosure identifying that a semiannual monitoring report for the reporting period from December 19, 2017, through June 18, 2018, had not been submitted as required. Enforcement Case 9267 was opened on August 20, 2018. Based on the information submitted with the self-disclosure, it was determined no further facility action was necessary. The enforcement case was closed on October 1, 2018.
Full Compliance Evaluation	06/29/2020	An off-site Full Compliance Inspection was conducted via phone and email. The information obtained for this inspection is still under review.

SECTION XIV. TIER CLASSIFICATION, PUBLIC AND EPA REVIEW

This application has been determined to be a **Tier II** based on the request for a major source construction permit for a “significant modification” of a Title V source per OAC 252:100-8-4(a)(1)(B)(iv). The applicant requested that the permit be processed through the “traditional NSR process” which requires a public review opportunity for a period of 30-days. EPA will have an opportunity to review the draft construction permit during this public review period.

The applicant published the “Notice of Filing a Tier II Application” on August 4, 2022, in *The Lawton Constitution*, a daily newspaper printed and published in the city of Lawton, County of Comanche, state of Oklahoma, and having general circulation therein. The notice stated that the application will be available for public review at the Lawton public Library, 110 SW 4th St., Lawton, OK 73501, or at the Air Quality Division’s main office.

The applicant will publish the “Notice of Tier II Draft Permit” as a legal notice in a newspaper of general circulation in the area where the source is located. The Notice of Tier II Draft Permit will state that the draft permit will be available for public review at a location in the county where the facility is located, and that the draft permit will also be available for public review at the Air Quality Division main office. The draft permit will be available for a 30-day public review period.

This facility is located within 50 miles of the Oklahoma-Texas border. The State of Texas and Tribal Nations will be notified of the draft permit.

The applicant has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant owns the property.

The information on all permit actions is available for review by the public in the Air Quality section of the DEQ web page at <https://www.deq.ok.gov>.

Environmental Justice Review

Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial operations.

AQD utilized the EPA model name EJ Screen to determine if the proposed project would result in disproportionate impacts to the community that would necessitate additional engagement during the public review process. Results of the EJ Screen indicated no disproportionate impacts will occur and the 30-day public review required is sufficient community engagement.

SECTION XV. SUMMARY

The applicant has demonstrated the ability to comply with the requirements of the applicable Air Quality rules and regulations. Ambient air quality standards are not threatened at this site. There are no active Air Quality compliance or enforcement concerning this facility. Issuance of the permit is recommended, contingent upon public review.

**PERMIT TO CONSTRUCT
AIR POLLUTION CONTROL FACILITY
SPECIFIC CONDITIONS**

**The Goodyear Tire & Rubber Company
Goodyear Lawton**

**Permit No. 2011-0440-C (M-16) PSD
Facility ID: 662**

The permittee is authorized to construct in conformity with the specifications submitted to Air Quality on April 28, 2022, and supplemental information received thereafter. The Evaluation Memorandum dated October 27, 2022, is attached to this permit to explain the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Commencing construction and continuing operations under this permit constitutes acceptance of and consent to, the conditions contained herein:

1. Points of emissions and emission limitations: [OAC 252:100-8-6(a)(1)]

EUG	EU Name / Model	VOC ⁽¹⁾ Emissions (TPY)	PM₁₀ Emissions (TPY)
EUG-BB	Banbury Mixers	627	82.73
EUG-EXT	Extruders 2, 3, 5, 7,8 and 9		
EUG-EXTNSPS	Extruders 1 and 4		
EUG-GC	Gum Calender 2, 3 & 4		
EUG-FWC	Fabric & Wire Calenders		
EUG-GTS	Non-NSPS Green Tire Spray Booths		
EUG-GTSNSPS	NSPS Green Tire Spray Booths		
EUG-HF	Hot Former		
EUG-STRIPP	Green Tire Stripping		
EUG-CP	Curing Presses		
EUG-GRFVM	Force Variation Machine & Radial Run-out Grinders		
EUG-GRWSW	White Sidewall Grinders		
EUG-BLUE	White Sidewall Machines		
EUG-RECYCLE	Recycling Mills		
EUG-AP	Apexers AP01-AP12		

⁽¹⁾ Total VOC (includes ethanol).

- a. Compliance with the above emissions limitations shall be based on a 12-month rolling total and shall be demonstrated monthly by means of records maintained on-site.

EUG “B&W”: Babcock & Wilcox Boilers Emissions

EU	CO		VOC		NO _x			SO ₂			PM		
	lb/hr	TPY	lb/hr	TPY	lb/MMBtu	lb/hr	TPY	lb/MMBtu	lb/hr	TPY	lb/MMBtu	lb/hr	TPY
Natural Gas													
PHCB1	12.5	54.6	0.8	3.6	0.2	24.4	107	0.2	24.4	107	0.3	36.6	160.3
PHCB2	12.5	54.6	0.8	3.6	0.2	24.4	107	0.2	24.4	107	0.3	36.6	160.3

- a. Compliance with TPY emissions limitations shall be based on a 12-month rolling total, and demonstrated monthly by means of records maintained on-site.
- b. Compliance with lb/hr emissions limitations shall be based on the 12-month monthly rolling total divided by the total hours of operation of the individual boilers during each calendar month for the 12-month period.
- c. Compliance with lb/MMBtu emission limitations shall be calculated based on the most recent AP-42 Section 1.4 emission factors.
- d. The boilers shall be fueled with pipeline natural gas (as defined under 40 CFR §72.2) having no more than 0.5 grains TRS per 100 scf. [OAC 252:100-31-25]
- e. The boilers shall comply with all applicable requirements of NESHAP 40 CFR Part 63, Subpart DDDDD, including, but not limited to, the following:
[40 CFR §§63.7480 through 63.7575]

- i. §63.7480 What is the purpose of this subpart?
- ii. §63.7485 Am I subject to this subpart?
- iii. §63.7490 What is the affected source of this subpart?
- iv. §63.7491 Are any boilers or process heaters not subject to this subpart?
- v. §63.7495 When do I have to comply with this subpart?
- vi. §63.7499 What are the subcategories of boilers and process heaters?
- vii. §63.7500 What emission limitations, work practice standards, and operating limits must I meet?
- viii. §63.7505 What are my general requirements for complying with this subpart?
- ix. §63.7510 What are my initial compliance requirements and by what date must I conduct them?
- x. §63.7515 When must I conduct subsequent performance tests, fuel analyses, or tune-ups?
- xi. §63.7520 What stack tests and procedures must I use?
- xii. §63.7521 What fuel analyses, fuel specification, and procedures must I use?
- xiii. §63.7522 Can I use emissions averaging to comply with this subpart?
- xiv. §63.7525 What are my monitoring, installation, operation, and maintenance requirements?
- xv. §63.7530 How do I demonstrate initial compliance with the emission limitations, fuel specifications and work practice standards?
- xvi. §63.7533 Can I use efficiency credits earned from implementation of energy conservation measures to comply with this subpart?
- xvii. §63.7535 Is there a minimum amount of monitoring data I must obtain?

- xviii. §63.7540 How do I demonstrate continuous compliance with the emission limitations, fuel specifications and work practice standards?
- xix. §63.7541 How do I demonstrate continuous compliance under the emissions averaging provision?
- xx. §63.7545 What notifications must I submit and when?
- xxi. §63.7550 What reports must I submit and when?
- xxii. §63.7555 What records must I keep?
- xxiii. §63.7560 In what form and how long must I keep my records?
- xxiv. §63.7565 What parts of the General Provisions apply to me?
- xxv. §63.7575 What definitions apply to this subpart?

EUG “KEEL”: Keeler Boiler Emissions

EU	CO		VOC		NO _x			SO ₂			PM		
	lb/hr	TPY	lb/hr	TPY	lb/MMBtu	lb/hr	TPY	lb/MMBtu	lb/hr	TPY	lb/MMBtu	lb/hr	TPY
Fuel Oil													
PHOB	4.1	18.1	0.2	0.9	0.3	27.7	121	0.8	73.8	323	0.4	36.9	161.7
Natural Gas													
PHOB	10.2	44.8	0.7	2.9	0.2	20	88	0.2	20	88	0.4	40	175.2

- a. Compliance with TPY emissions limitations shall be based on a 12-month rolling total, and demonstrated monthly by means of records maintained on-site.
- b. Compliance with lb/hr emissions limitations shall be based on the 12-month rolling total divided by the total hours of operation of the boiler during the months operated in the 12-month period.
- c. Compliance with lb/MMBtu emission limitations shall be calculated based on the most recent AP-42, Section 1.4 emission factors for natural gas combustion and AP-42 Section 1.3 for fuel oil combustion.
- d. The boiler shall be fueled with pipeline natural gas (as defined under 40 CFR §72.2, having no more than 0.5 gr TRS per 100 scf) or fuel oil. [OAC 252:100-31-25]
- e. Fuel oil sulfur content shall not exceed 0.8% by weight. [OAC 252:100-31-25]
- f. The boiler shall comply with all applicable requirements of NESHAP 40 CFR Part 63, Subpart DDDDD, including, but not limited to, the following:
 - [40 CFR §§63.7480 through 63.7575]
 - i. § 63.7480 What is the purpose of this subpart?
 - ii. § 63.7485 Am I subject to this subpart?
 - iii. § 63.7490 What is the affected source of this subpart?
 - iv. § 63.7491 Are any boilers or process heaters not subject to this subpart?
 - v. § 63.7495 When do I have to comply with this subpart?
 - vi. § 63.7499 What are the subcategories of boilers and process heaters?
 - vii. § 63.7500 What emission limitations, work practice standards, and operating limits must I meet?
 - viii. § 63.7505 What are my general requirements for complying with this subpart?

- ix. § 63.7510 What are my initial compliance requirements and by what date must I conduct them?
- x. § 63.7515 When must I conduct subsequent performance tests, fuel analyses, or tune-ups?
- xi. § 63.7520 What stack tests and procedures must I use?
- xii. § 63.7521 What fuel analyses, fuel specification, and procedures must I use?
- xiii. § 63.7522 Can I use emissions averaging to comply with this subpart?
- xiv. § 63.7525 What are my monitoring, installation, operation, and maintenance requirements?
- xv. § 63.7530 How do I demonstrate initial compliance with the emission limitations, fuel specifications and work practice standards?
- xvi. § 63.7533 Can I use efficiency credits earned from implementation of energy conservation measures to comply with this subpart?
- xvii. § 63.7535 Is there a minimum amount of monitoring data I must obtain?
- xviii. § 63.7540 How do I demonstrate continuous compliance with the emission limitations, fuel specifications and work practice standards?
- xix. § 63.7541 How do I demonstrate continuous compliance under the emissions averaging provision?
- xx. § 63.7545 What notifications must I submit and when?
- xxi. § 63.7550 What reports must I submit and when?
- xxii. § 63.7555 What records must I keep?
- xxiii. § 63.7560 In what form and how long must I keep my records?
- xxiv. § 63.7565 What parts of the General Provisions apply to me?
- xxv. § 63.7575 What definitions apply to this subpart?

EUG “COOL”: Cooling Towers

EU	PM TPY
Cooling Tower (CT-01)	7.5
Cooling Tower (CT-05)	7.5

- a. The permittee shall maintain on-site records regarding Total Dissolved Solids (TDS) and Drift percent.
- b. Compliance with the above emission limitation shall be based on a 12-month monthly rolling total, and demonstrated by means of monthly records maintained on-site.

EUG “ENG-CI-NSPS”: Stationary CI-RICE Subject to NSPS, Subpart IIII

EU	Name/Model	HP
EFP-5	Emergency Fire Pump / John Deere JU6H-UFADS8	260
EFP-6	Emergency Fire Pump / John Deere JU6H-UFADS8	260
EFP-7	Emergency Fire Pump / John Deere JW6H-UF48	290

EU	Name/Model	HP
EFP-8	Emergency Fire Pump / John Deere JU6H-UFADS8	260
GEN-1	Diesel Backup Generator / Cummins QSX15-G9	755
GEN-2	Diesel Generator / Mitsubishi L3E-W461ML	12
GEN-3	Diesel Generator / Mitsubishi L3E-W461ML	12
GEN-4	Diesel Generator / Mitsubishi L3E-W461ML	12
GEN-5	Diesel Generator / Mitsubishi L3E-W461ML	12
GEN-6	Diesel Generator / Mitsubishi L3E-W461ML	12
GEN-7	Diesel Generator / Mitsubishi L3E-W461ML	12
GEN-8	Diesel Generator / Mitsubishi L3E-W461ML	12
GEN-9	Diesel Generator / Mitsubishi L3E-W461ML	12
GEN-10	Diesel Generator / Mitsubishi L3E-W461ML	12
GEN-11	Diesel Backup Generator / Cummins QSX15-G9	755

- a. The permittee shall record the hours of operation of the engines (EFP-5, EFP-6, EFP-7, EFP-8, GEN-1, and GEN-11) each month and calculate 12-month rolling totals. Hours of operation shall be monitored using one of the following methods:
 - [OAC 252:100-8-6(a)]
 - i. With an hour meter. The hour meter shall either be non-resettable or, if resettable, the date and hour each time the meter is reset shall be maintained.
 - ii. With a fuel meter recorded at least hourly.
 - iii. By manually monitoring and recording hours of operation the engine is used each day.
- b. Engines (GEN-2 – GEN-10) are authorized to operate continuously (24 hours per day, every day of the year).
- c. The engine shall have a permanent identification plate attached that shows the make, model number, and serial number. [OAC 252:100-43]
- d. The owner/operator shall comply with all applicable requirements of the NSPS 40 CFR Part 60, Subpart III, Stationary Compression Ignition (CI) Internal Combustion Engines (ICE), for each affected facility including but not limited to: [40 CFR §§ 60.4200-60.4219]
 - i. § 60.4200 Am I subject to this subpart?
 - ii. § 60.4204 What emission standards must I meet for non-emergency engines if I am an owner or operator of a stationary CI internal combustion engine?
 - iii. § 60.4205 What emission standards must I meet for emergency engines if I am an owner or operator of a stationary CI internal combustion engine?
 - iv. § 60.4206 How long must I meet the emission standards if I am an owner or operator of a stationary CI internal combustion engine?
 - v. § 60.4207 What fuel requirements must I meet if I am an owner or operator of a stationary CI internal combustion engine subject to this subpart?
 - vi. § 60.4208 What is the deadline for importing and installing stationary CI internal combustion engine produced in previous model years?
 - vii. § 60.4209 What are the monitoring requirements if I am an owner or operator of a stationary CI internal combustion engine?

- viii. § 60.4211 What are my compliance requirements if I am an owner or operator of a stationary CI internal combustion engine?
- ix. § 60.4212 What test methods and other procedures must I use if I am an owner or operator of a stationary CI internal combustion engine with a displacement of less than 30 liters per cylinder?
- x. § 60.4214 What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary CI internal combustion engine?
- xi. § 60.4218 What parts of the General Provisions apply to me?
- xii. § 60.4219 What definitions apply to this subpart?

EUG “EBP”: Electron Beam Processing

EU	POINT	EU Name / Model
EBP-1	EBP-1	Electron Beam Processing Unit

- a. Ozone emissions associated with this activity are already individually reported in annual emissions inventories. Therefore, no additional recordkeeping will be required in the permit.

EUG “AP”: Apexers

EU	POINT	EU Name / Model
AP01	57K	Apex Extruder #1 (2.75” extruder)
AP02	58K	Apex Extruder #2 (2.75” extruder)
AP03	60K	Apex Extruder #3 (2.75” extruder)
AP04	61K	Apex Extruder #4 (2.75” extruder)
AP05	63HW	Apex Extruder #5 (2.75” extruder)
AP06	64HW	Apex Extruder #6 (2.75” extruder)
AP07	65HW	Apex Extruder #7 (2.75” extruder)
AP08	66HW	Apex Extruder #8 (2.75” extruder)
AP09	62SX2	Apex Extruder #9 (2.75” extruder)
AP10	63SX2	Apex Extruder #10 (2.75” extruder)
AP11	66SX2	Apex Extruder #11 (2.75” extruder)
AP12	58BZN	Apex Extruder #12 (3.5” extruder)

- a. The apexers listed above shall be operated in accordance with the following “good design and operating” practices: [OAC 252:100-8-34(b)]
 - i. Operate and maintain the apexers in accordance with manufacturer requirements and written standard operating procedures.
 - ii. Preventative maintenance on the apexers will be conducted at least annually (once every calendar year). The date, time, and maintenance performed shall be recorded as completed.
 - iii. Regulated chemicals and solids with VOC s related to apexer operations will be stored and utilized in a way to minimize emissions and potential for

spills. Goodyear shall conduct initial and annual (once every calendar year) associate training on proper regulated material handling and spill cleanup. Records of completed training and documentation will be maintained and shall be provided to regulatory personnel upon request.

- iv. Waste materials from spills of such regulated materials will be immediately collected and properly disposed off-site.

EUG “CP”: Curing Presses

EU	POINT	EU Name / Model
CP07	88-95ZS	26 curing presses – Trench #7 (700/800 rows)
CP06	88-95BY	26 curing presses – Trench #7 (900/1000 rows)

- a. The curing presses listed above shall be operated in accordance with the following “good design and operating” practices: [OAC 252:100-8-34(b)]
 - i. Operate and maintain the curing presses in accordance with manufacturer requirements and internal written standard operating procedures.
 - ii. Preventative maintenance on the curing presses will be conducted at least annually (once every calendar year). The date, time, and maintenance performed shall be recorded as completed.
 - iii. Regulated chemicals and solids with VOCs related to curing operations will be stored and utilized in a way to minimize emissions and the potential for spills. Goodyear shall conduct initial and annual (once every calendar year) associate training on proper regulated material handling and spill cleanup. Records of completed training and documentation will be maintained and shall be provided to regulatory personnel upon request.
 - iv. Waste materials from spills of such regulated materials will be immediately collected and properly disposed off-site.

EUG “GTSNSPS”: NSPS Green Tire Spray Booths

EU	POINT	EU Name / Model
PL-05	79HW	Backup spray booth #1 (Manual)
PLT-01	80KZ	Green tire paint tank
PLT-02	80KZ	Green tire paint tank
SPR01	82MK	Green tire spray booth #6 (Automatic)
SPR02	82KZ	Green tire spray booth #5 (Automatic)
SPR03	82HW	Green tire spray booth #4 (Automatic)

- a. The green tire spray booth equipment listed above shall be operated in accordance with the following “good design and operating” practices: [OAC 252:100-8-34(b)]
 - i. The green tire spray booths shall be limited to use only water-based green tires sprays which shall meet the VOC content limitations set forth in 40 CFR Part 60, Subpart BBB.
 - ii. Monitor and maintain records required by 40 CFR Part 60, Subpart BBB.

- iii. Operate and maintain the green tire spray booths in accordance with manufacturer requirements and written standard operating procedures.
 - iv. Preventative maintenance on the green tire spray booths will be conducted at least annually (once every calendar year). The date, time, and maintenance performed shall be recorded as completed.
 - v. Regulated chemicals and solids with VOCs related to green tire spray booth operations will be stored and utilized in a way to minimize emissions and the potential for spills. Goodyear shall conduct initial and annual (once every calendar year) associate training on proper regulated material handling and spill cleanup. Records of completed training and documentation will be maintained and shall be provided to regulatory personnel upon request.
 - vi. Waste materials from spills of such regulated materials will be immediately collected and properly disposed off-site.
2. The permittee shall be authorized to operate the facility continuously (24 hours per day, every day of the year). [OAC 252:100-8-6(a)(1)]
3. Mixing of the following non-productive High Dispersion Silica (HDS) compounds shall be restricted to Banbury Mixers No. 3, 4, 5, 6, and 7 with emissions controlled by an RTO: [OAC 252:100-8-6(a)(1)]
 - a. Mix passes with a mixing temperature greater than or equal to 290°F during which ethanol generating silane couplers are added to the compound, and the compound contains at least 25 parts of silica per hundred parts of rubber (phr) by weight.
 - b. Mix passes with a mixing temperature greater than or equal to 290°F of compounds that already contain ethanol generating silane couplers, and that contain at least 25 parts of silica per hundred parts of rubber (phr) by weight.
4. Except as specified in Specific Condition 3, all other compounds/formulations are authorized to be mixed in Banbury Nos. 1, 2, 3, 4, 5, 6, 7, and 8. [OAC 252:100-8-6(a)(1)]
5. The permittee shall maintain monthly records that include coupling agent usage for: [OAC 252:100-43]
 - a. Conventional silica rubber,
 - b. High dispersion silica rubber,
 - c. Imported rubber containing coupling agent, and
 - d. Exported rubber containing coupling agent.

These records shall be used to calculate the actual quantity of ethanol emitted during each calendar month. The method used to calculate these emissions shall use Rubber Manufacturer's Association (RMA) emission factors, rubber throughput, silane coupling agent usage, and hours of operation. The records shall be updated within thirty (30) days after the end of each month. Compliance will be based on a 12-month monthly rolling

total. These records shall be maintained on-site for at least five years after the date of recording and shall be provided to regulatory personnel upon request.

6. Emissions from Banbury Mixers No. 3, 4, 5, 6, and 7 shall be vented to a Regenerative Thermal Oxidizer (RTO) control device when non-productive High Dispersion Silica (HDS) rubber specified in Specific Condition 3 is mixed unless otherwise allowed in OAC 252:100-9 (Excess Emission and Malfunction Reporting Requirements).

[OAC 252:100-8-6(a)(3)(A)]

- a. The RTO #1 control device shall reduce the input stream of ethanol by 98 weight percent or to a concentration of 20 parts per million by volume, on a dry basis and corrected to 3 percent oxygen, whichever is less stringent.
 - b. The RTO #2 control device shall reduce the input stream of ethanol by 98 weight percent.
 - c. While the Banbury Mixers are mixing non-productive HDS rubber, the following restrictions shall be observed:
 - i. No more than five Banbury Mixers mixing non-productive HDS rubber shall be operated at a time.
 - ii. The emissions from no more than three Banbury Mixers mixing non-productive HDS rubber shall be routed to a single RTO (either #1 or #2) at a time.
 - iii. Emissions from the Banbury Mixers may be routed to either RTO #1 or RTO #2 as needed.
 - iv. An automated (e.g., computer) control system shall ensure compliance with restrictions 6.c.i through iii.
7. The permittee shall operate and maintain each of the RTOs in accordance with the following requirements which constitute the Compliance Assurance Monitoring (CAM) plan for the subject units:

[OAC 252:100-8-6(a)(3)(A), 40 CFR Part 64, and Permit No. 2011-0440-TV]R]

- a. Operate each RTO at a temperature equal to or greater than 1,350 °F (hourly average) in the center bed combustion zone.
- b. The temperature shall be monitored and recorded continuously (at least four times an hour and averaged over the hour with a minimum data availability of 90 percent) using a thermocouple or equivalent measurement device.
- c. Proper operation of the center bed combustion zone thermocouple shall be verified annually.
- d. The RTOs shall only be fueled with pipeline natural gas. Pipeline natural gas is subject (under 40 CFR §72.2) to a limit of 0.5 grains of total reduced sulfur (TRS) per 100 scf. Compliance can be shown by the following methods: for pipeline grade natural gas, a current gas company bill. Compliance shall be demonstrated at least once every calendar year.
- e. Provide a means for logging all occasions when operating temperatures are 3 % less than the established hourly average temperature.

- f. Each RTO shall be checked (routine inspection) at least once per calendar week for proper operation. A log shall be maintained, recording the results of the routine inspection, the name of the person performing the inspection, and any correction action performed (if required).
 - g. §64.7 Operation of approved monitoring.
 - h. §64.8 Quality improvement plan (QIP) requirements.
 - i. §64.9 Reporting and recordkeeping requirements.
8. All NSPS affected sources (which includes but are not limited to tread end cementing operations at Extruder lines #1 and #4 and Green tire spraying operations at paint lines #1, #2, #3, #4, #7, and #8 (EUG-EXTNSPS and EUG-GTSNSPS)) at the plant are subject to the applicable requirements of 40 CFR Part 60, Subpart BBB and shall comply with all applicable requirements, including the following: [40 CFR §§ 60.540 through 60.548]
- a. § 60.540 Applicability and designation of affected facilities.
 - b. § 60.541 Definitions.
 - c. § 60.542 Standards for volatile organic compounds.
 - d. § 60.542a Alternate standard for volatile organic compounds.
 - e. § 60.543 Performance test and compliance provisions.
 - f. § 60.544 Monitoring of operations.
 - g. § 60.545 Recordkeeping requirements.
 - h. § 60.546 Reporting requirements.
 - i. § 60.547 Test methods and procedures.
 - j. § 60.548 Delegation of authority.
9. The following list includes, but is not limited to, the emission units and/or operations that are subject to and shall comply with all applicable requirements of NESHAP 40 CFR Part 63, Subpart XXXX for Rubber Tire Manufacturing: [40 CFR §§ 63.5980 through 63.6015]
- a. Mixed rubber compound non-stick coating (slurry dip),
 - b. Tread striping operations at extruder lines,
 - c. Tread end cementing operations at extruder lines,
 - d. Green tire stripping operations,
 - e. Uncured rubber tire component refreshing,
 - f. Curing bladder release agent,
 - g. Tire mold lubricant (swab),
 - h. White sidewall protective coating,
 - i. Inspector and classifier identification stamp,
 - j. Cured tire repair operations,
 - k. Bead lubricants for tire inspection and grinding operations, and
 - l. Tire quality markings (harmonic dot, etc).

As a demonstration of compliance, 40 CFR §63.5996 requires the owner or operator of each source complying with either the purchase alternative or the monthly average alternative to demonstrate that no cements and solvents were purchased and used at the affected source

that contain HAPs in amounts above those established in 40 CFR §63.5985(a) and 40 CFR §63.5985(b), respectively.

- a. Purchase alternative: Use only cements and solvents that, as purchased, contain less than 2 lb HAP/ton of cement or solvent for HAP listed in Table 16 of this subpart, and less than 20 lb HAP/ton of cement or solvent for all other HAP. [40 CFR §63.5985(a)]
 - b. Monthly average alternative:
 - i. Option 1: Use cements and solvents such that monthly average emissions of HAP listed in Table 16 of this subpart are less than 2 lb HAP/ton of cement or solvent, and less than 20 lb HAP/ton of cement or solvent for all other HAP. [40 CFR §63.5985(b)]
 - ii. Option 2: Use cements and solvents such that the monthly average emissions of HAP are less than 0.00005 lb HAP/ton of rubber used at the tire production affected source. [40 CFR §63.5985(b)]
10. The following operations shall utilize the specified PM emissions controls or equivalent devices with at least the required control efficiency. The permittee shall inspect and maintain the air pollution control devices in accordance with good engineering practices to ensure proper operation. [OAC 252:100-19]

Operation	PM Emission Control Device	Minimum Required Control Efficiency
Banburys - all	Baghouse	99%
Force grinder operations - all	Dust collector	91.7%
White sidewall grinder operations - all	Dust collector	99.9%
Radial run-out grinder operations - all	Dust collector	99.9%

11. The permittee shall maintain records of operations as listed below. Such records shall be maintained on-site for at least five years after the date of recording and shall be provided to regulatory personnel upon request. [OAC 252:100-43]
- a. Monthly and 12-month rolling total emission calculations. The records shall be updated within thirty (30) days after the end of each month. Compliance will be based on a 12-month rolling total.
 - b. MSDS sheet for all solvents and cements used which documents VOC and HAP content in units of lbs per gallon.
 - c. Sulfur content of each shipment of liquid fuel.
 - d. For natural gas, a gas-company bill.
 - e. For the limited use engines, records required under Specific Condition No. 1, ENG-CI-NSPS, Paragraph a.
 - f. Records required by 40 CFR Part 60, Subparts BBB and IIII.
 - g. Records required by 40 CFR Part 63, Subparts XXXX, ZZZZ, and DDDDD.
 - h. Records required by 40 CFR Part 64.
 - i. Number of tires produced (monthly and 12-month monthly rolling total).
 - j. Hot Former rubber throughput (monthly and 12-month monthly rolling total).

- k. Amount of Green tire spray used and total tires sprayed (monthly) (EUG-GTSNSPS – Booths #1, #2, #3, #4, #5, #6, #7 and #8).
 - l. Material used in the stripping operation and the monthly and annual usage for this material.
 - m. Monthly and annual records of Total Dissolved Solids (TDS), Drift %, and annual PM₁₀ emissions from drift losses from the Cooling Tower (EUG COOL).
 - n. Monthly and annual records of coupling agent usage.
 - o. MSDS and coating formulations for all paints applied in EUG-BLUE, EUG-GTS, and EUG-GTSNSPS.
 - p. Monthly and annual records of the amount of cement used and total cut tread for Extruders #1 and #4. (EUG-EXTNSPS)
 - q. The temperature of each RTO center bed combustion zone (hourly average). A log of all occasions when operating temperatures are 3 % less than the established temperature.
 - r. Routine inspection and maintenance logs for each RTO in accordance with Specific Condition No. 7.f.
 - s. Inspection log and pressure differential readings for the baghouses and dust collectors in accordance with Specific Condition No. 10.
 - t. Records of preventative maintenance and training as required for the specified equipment under EUG-AP, EUG-CP, and EUG-GTSNSPS under Specific Condition No. 1.
12. The equipment items listed below are considered insignificant because emissions are less than 5 TPY. There are no applicable emission limitations specified.

[OAC 252:100-8-6(a)(3)(B)]

EU	EU Name / Model	Capacity (gal.)
FOST-02	No. 2 Fuel Oil Storage Tank	250,000
TF 1	Process Oils & Additives Storage Tank	30,000
TF 3	Process Oils & Additives Storage Tank	30,000
TF 2	Process Oils & Additives Storage Tank	30,000
TF 4	Process Oils & Additives Storage Tank	15,000
TF 5	Process Oils & Additives Storage Tank	15,000
TF 6	Process Oils & Additives Storage Tank	7,500
TF 7	Process Oils & Additives Storage Tank	8,000
AST-01	Sulfuric Acid Storage Tank – Pump Room	1,450
AST-02	Sulfuric Acid Storage Tank – Curing Cooling Tower	1,450
SHST	Sodium Hypochlorite Storage Tank	1,400
AST-03	Hydrochloric Acid Storage Tank – South Extruding	1,350
AST-04	Sulfuric Acid Storage Tank – East Powerhouse	1,450

EU	EU Name / Model	Capacity (gal.)
PST-01	Propane Storage Tank	1,000
PST-02*	Propane Storage Tank	1,000
MT01-MT34, CB01-CB04	Carbon Black Storage & Handling	--
N/A	Slurry Mixing	--
CT-02	Curing Cooling Tower	--
CT-04	Psychrometric Cooling Tower	--
GRNDTK	Gasoline/Diesel Split Tank and Fuel Oil Tanks	--
N/A	Bead Production	--
N/A	Miscellaneous Solvent Usage	--
N/A	Conicity Grinders (#1) and Matteuzi Grinders (#1 through #8)	--

*Tank not currently in use. Is still on-site, but covers have been removed.

13. The following records shall be maintained on-site to verify Insignificant Activities. No recordkeeping is required for those operations which qualify as Trivial Activities.

[OAC 252:100-8-6(a)(3)(B)]

 - a. Monthly records of fuel purchases for the Gasoline/Diesel Split Tank.
 - b. Type of liquid stored and vapor pressure of the liquid for the process and fuel oil tanks.
 - c. Weight of crushed drums disposed monthly.
 - d. Annual amount of carbon black utilized at the facility.
 - e. Annual weight of slurry purchased and applicable MSDS.
 - f. Record of the hours of operation annually and calculation of annual emissions based on AP-42 emission factors for the following:
 - i. Curing Cooling Tower.
 - ii. Psychrometric Cooling Tower.
 - iii. Conicity Griders (#1).
 - iv. Matteuzi Grinders (#1 through #8).

14. The permittee may add equipment/processes to the facility which are classified as Insignificant Activities or Trivial Activities (as defined in OAC 252:100-8-2) during the life of this permit. New equipment listed as Insignificant Activities that require the maintenance of records (e.g., hours of operation, quantity of materials processed, capacity, etc.) shall be identified and appropriate records maintained at the facility. Upon request, the permittee shall make such records available to the AQD.

[OAC 252:100-8-6(a)(7)(E)]

15. This facility is considered an existing Prevention of Significant Deterioration (PSD) facility. As such, the facility is subject to the provisions of OAC 252:100-8-36.2(c) for any project as defined therein.

[OAC 252:100-8-36.2(c)]

16. To the extent this permit requires the permittee to record and/or maintain records, the same may be conducted in hardcopy or electronically as long as such records can be provided to DEQ personnel within a reasonable time following a request for the same.
[OAC 252:100-8-6(a)(7)(E)]
17. No later than 30 days after each anniversary date of the issuance of the initial Title V operating permit (December 19, 2006), the permittee shall submit to Air Quality Division of DEQ, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit.
[OAC 252:100-8-6(c)(5)(A) & (D)]
18. The permittee shall apply for a modified operating permit within 180 days of commencement of operation of any new equipment authorized by this construction permit, incorporating the various changes.
[OAC 252:100-8-4(b)(5)(A)]

The Goodyear Tire & Rubber Company
Attn: Richard Pepper
1 SW Goodyear Boulevard
Lawton, OK 73505

SUBJECT: Permit No. 2011-0440-C (M-16) PSD
Goodyear Lawton
AQD Facility ID: 662
1 SW Goodyear Boulevard, Lawton, OK 73505
Section 36, Township 2N, Range 13W, Comanche County, Oklahoma

Dear Mr. Pepper:

Enclosed is the permit authorizing construction of the referenced facility. Please note that this permit is issued subject to the certain standards and specific conditions, which are attached. These conditions must be carefully followed since they define the limits of the permit and will be confirmed by periodic inspections.

Also note that you are required to annually submit an emissions inventory for this facility. An emissions inventory must be completed through DEQ's electronic reporting system by April 1st of every year. Any questions concerning the submittal process should be referred to the Emissions Inventory Staff at (405) 702-4100.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or Joseph Wills, the permit writer, at Joseph.Wills@deq.ok.gov or (405) 702-4100.

Sincerely,

DRAFT

Phillip Fielder, P.E.
Chief Engineer
AIR QUALITY DIVISION

Enclosures



NSR/CONSTRUCTION PERMIT

AIR QUALITY DIVISION
STATE OF OKLAHOMA
DEPARTMENT OF ENVIRONMENTAL QUALITY
707 NORTH ROBINSON, SUITE 4100
P.O. BOX 1677
OKLAHOMA CITY, OKLAHOMA 73101-1677

Permit No. 2011-0440-C (M-16) PSD

The Goodyear Tire & Rubber Company,

having complied with the requirements of the law, is hereby granted permission to operate the Goodyear Lawton facility located at 1 SW Goodyear Boulevard, in the City of Lawton, Comanche County, Oklahoma, subject to the Standard Conditions dated June 21, 2016, and Specific Conditions, both of which are attached.

In the absence of construction commencement, this permit shall expire 18 months from the issuance date, as authorized under Section VIII of the Standard Conditions.

DRAFT

Kendal Stegmann, Division Director
Air Quality Division

Date

Department of Environmental Quality (DEQ)
Air Quality Division (AQD)
Acronym List
9-10-21

ACFM	Actual Cubic Feet per Minute	GEP	Good Engineering Practice
AD	Applicability Determination	GHG	Greenhouse Gases
AFRC	Air-to-Fuel Ratio Controller	GR	Grain(s) (gr)
API	American Petroleum Institute		
ASTM	American Society for Testing and Materials	H₂CO	Formaldehyde
		H₂S	Hydrogen Sulfide
		HAP	Hazardous Air Pollutants
BACT	Best Available Control Technology	HC	Hydrocarbon
BAE	Baseline Actual Emissions	HCFC	Hydrochlorofluorocarbon
BBL	Barrel(s)	HFR	Horizontal Fixed Roof
BHP	Brake Horsepower (bhp)	HON	Hazardous Organic NESHAP
BTU	British thermal unit (Btu)	HP	Horsepower (hp)
		HR	Hour (hr)
C&E	Compliance and Enforcement		
CAA	Clean Air Act	I&M	Inspection and Maintenance
CAM	Compliance Assurance Monitoring	IBR	Incorporation by Reference
CAS	Chemical Abstract Service	ICE	Internal Combustion Engine
CAAA	Clean Air Act Amendments		
CC	Catalytic Converter	LAER	Lowest Achievable Emission Rate
CCR	Continuous Catalyst Regeneration	LB	Pound(s) [Mass] (lb, lbs, lbm)
CD	Consent Decree	LB/HR	Pound(s) per Hour (lb/hr)
CEM	Continuous Emission Monitor	LDAR	Leak Detection and Repair
CFC	Chlorofluorocarbon	LNG	Liquefied Natural Gas
CFR	Code of Federal Regulations	LT	Long Ton(s) (metric)
CI	Compression Ignition		
CNG	Compressed Natural Gas	M	Thousand (Roman Numeral)
CO	Carbon Monoxide or Consent Order	MAAC	Maximum Acceptable Ambient Concentration
COA	Capable of Accommodating	MACT	Maximum Achievable Control Technology
COM	Continuous Opacity Monitor	MM	Prefix used for Million (Thousand-Thousand)
D	Day	MMBTU	Million British Thermal Units (MMBtu)
DEF	Diesel Exhaust Fluid	MMBTUH	Million British Thermal Units per Hour (MMBtu/hr)
DG	Demand Growth	MMSCF	Million Standard Cubic Feet (MMscf)
DSCF	Dry Standard (At Standard Conditions) Cubic Foot (Feet)	MMSCFD	Million Standard Cubic Feet per Day
		MSDS	Material Safety Data Sheet
EGU	Electric Generating Unit	MWC	Municipal Waste Combustor
EI	Emissions Inventory	MWe	Megawatt Electrical
EPA	Environmental Protection Agency		
ESP	Electrostatic Precipitator	NA	Nonattainment
EUG	Emissions Unit Group	NAAQS	National Ambient Air Quality Standards
EUSGU	Electric Utility Steam Generating Unit	NAICS	North American Industry Classification System
		NESHAP	National Emission Standards for Hazardous Air Pollutants
FCE	Full Compliance Evaluation	NH₃	Ammonia
FCCU	Fluid Catalytic Cracking Unit	NMHC	Non-methane Hydrocarbon
FESOP	Federally Enforceable State Operating Permit	NGL	Natural Gas Liquids
		NO₂	Nitrogen Dioxide
FIP	Federal Implementation Plan	NO_x	Nitrogen Oxides
FR	Federal Register	NOI	Notice of Intent
		NSCR	Non-Selective Catalytic Reduction
GACT	Generally Achievable Control Technology		
GAL	Gallon (gal)		
GDF	Gasoline Dispensing Facility		

NSPS	New Source Performance Standards	SNCR	Selective Non-Catalytic Reduction
NSR	New Source Review	SO₂	Sulfur Dioxide
		SO_x	Sulfur Oxides
O₃	Ozone	SOP	Standard Operating Procedure
O&G	Oil and Gas	SRU	Sulfur Recovery Unit
O&M	Operation and Maintenance		
O&NG	Oil and Natural Gas	T	Tons
OAC	Oklahoma Administrative Code	TAC	Toxic Air Contaminant
OC	Oxidation Catalyst	TEG	Triethylene Glycol
		THC	Total Hydrocarbons
PAH	Polycyclic Aromatic Hydrocarbons	TPY	Tons per Year
PAE	Projected Actual Emissions	TRS	Total Reduced Sulfur
PAL	Plant-wide Applicability Limit	TSP	Total Suspended Particulates
Pb	Lead	TV	Title V of the Federal Clean Air Act
PBR	Permit by Rule		
PCB	Polychlorinated Biphenyls	µg/m³	Micrograms per Cubic Meter
PCE	Partial Compliance Evaluation	US EPA	U. S. Environmental Protection Agency
PEA	Portable Emissions Analyzer		
PFAS	Per- and Polyfluoroalkyl Substance	VFR	Vertical Fixed Roof
PM	Particulate Matter	VMT	Vehicle Miles Traveled
PM_{2.5}	Particulate Matter with an Aerodynamic Diameter <= 2.5 Micrometers	VOC	Volatile Organic Compound
		VOL	Volatile Organic Liquid
PM₁₀	Particulate Matter with an Aerodynamic Diameter <= 10 Micrometers	VRT	Vapor Recovery Tower
		VRU	Vapor Recovery Unit
POM	Particulate Organic Matter or Polycyclic Organic Matter	YR	Year
ppb	Parts per Billion		
ppm	Parts per Million	2SLB	2-Stroke Lean Burn
ppmv	Parts per Million Volume	4SLB	4-Stroke Lean Burn
ppmvd	Parts per Million Dry Volume	4SRB	4-Stroke Rich Burn
PSD	Prevention of Significant Deterioration		
psi	Pounds per Square Inch		
psia	Pounds per Square Inch Absolute		
psig	Pounds per Square Inch Gage		
RACT	Reasonably Available Control Technology		
RATA	Relative Accuracy Test Audit		
RAP	Regulated Air Pollutant or Reclaimed Asphalt Pavement		
RFG	Refinery Fuel Gas		
RICE	Reciprocating Internal Combustion Engine		
RO	Responsible Official		
ROAT	Regional Office at Tulsa		
RVP	Reid Vapor Pressure		
SCC	Source Classification Code		
SCF	Standard Cubic Foot		
SCFD	Standard Cubic Feet per Day		
SCFM	Standard Cubic Feet per Minute		
SCR	Selective Catalytic Reduction		
SER	Significant Emission Rate		
SI	Spark Ignition		
SIC	Standard Industrial Classification		
SIP	State Implementation Plan		

**MAJOR SOURCE AIR QUALITY PERMIT
STANDARD CONDITIONS
(June 21, 2016)**

SECTION I. DUTY TO COMPLY

A. This is a permit to operate / construct this specific facility in accordance with the federal Clean Air Act (42 U.S.C. 7401, et al.) and under the authority of the Oklahoma Clean Air Act and the rules promulgated there under. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

B. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ). The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

C. The permittee shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Oklahoma Clean Air Act and shall be grounds for enforcement action, permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application. All terms and conditions are enforceable by the DEQ, by the Environmental Protection Agency (EPA), and by citizens under section 304 of the Federal Clean Air Act (excluding state-only requirements). This permit is valid for operations only at the specific location listed.

[40 C.F.R. §70.6(b), OAC 252:100-8-1.3 and OAC 252:100-8-6(a)(7)(A) and (b)(1)]

D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations. [OAC 252:100-8-6(a)(7)(B)]

SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS

A. Any exceedance resulting from an emergency and/or posing an imminent and substantial danger to public health, safety, or the environment shall be reported in accordance with Section XIV (Emergencies). [OAC 252:100-8-6(a)(3)(C)(iii)(I) & (II)]

B. Deviations that result in emissions exceeding those allowed in this permit shall be reported consistent with the requirements of OAC 252:100-9, Excess Emission Reporting Requirements. [OAC 252:100-8-6(a)(3)(C)(iv)]

C. Every written report submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F. [OAC 252:100-8-6(a)(3)(C)(iv)]

SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING

A. The permittee shall keep records as specified in this permit. These records, including monitoring data and necessary support information, shall be retained on-site or at a nearby field office for a period of at least five years from the date of the monitoring sample, measurement, report, or application, and shall be made available for inspection by regulatory personnel upon request. Support information includes all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Where appropriate, the permit may specify that records may be maintained in computerized form.

[OAC 252:100-8-6 (a)(3)(B)(ii), OAC 252:100-8-6(c)(1), and OAC 252:100-8-6(c)(2)(B)]

B. Records of required monitoring shall include:

- (1) the date, place and time of sampling or measurement;
- (2) the date or dates analyses were performed;
- (3) the company or entity which performed the analyses;
- (4) the analytical techniques or methods used;
- (5) the results of such analyses; and
- (6) the operating conditions existing at the time of sampling or measurement.

[OAC 252:100-8-6(a)(3)(B)(i)]

C. No later than 30 days after each six (6) month period, after the date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to AQD a report of the results of any required monitoring. All instances of deviations from permit requirements since the previous report shall be clearly identified in the report. Submission of these periodic reports will satisfy any reporting requirement of Paragraph E below that is duplicative of the periodic reports, if so noted on the submitted report.

[OAC 252:100-8-6(a)(3)(C)(i) and (ii)]

D. If any testing shows emissions in excess of limitations specified in this permit, the owner or operator shall comply with the provisions of Section II (Reporting Of Deviations From Permit Terms) of these standard conditions.

[OAC 252:100-8-6(a)(3)(C)(iii)]

E. In addition to any monitoring, recordkeeping or reporting requirement specified in this permit, monitoring and reporting may be required under the provisions of OAC 252:100-43, Testing, Monitoring, and Recordkeeping, or as required by any provision of the Federal Clean Air Act or Oklahoma Clean Air Act.

[OAC 252:100-43]

F. Any Annual Certification of Compliance, Semi Annual Monitoring and Deviation Report, Excess Emission Report, and Annual Emission Inventory submitted in accordance with this permit shall be certified by a responsible official. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

[OAC 252:100-8-5(f), OAC 252:100-8-6(a)(3)(C)(iv), OAC 252:100-8-6(c)(1), OAC 252:100-9-7(e), and OAC 252:100-5-2.1(f)]

G. Any owner or operator subject to the provisions of New Source Performance Standards (“NSPS”) under 40 CFR Part 60 or National Emission Standards for Hazardous Air Pollutants (“NESHAPs”) under 40 CFR Parts 61 and 63 shall maintain a file of all measurements and other information required by the applicable general provisions and subpart(s). These records shall be maintained in a permanent file suitable for inspection, shall be retained for a period of at least five years as required by Paragraph A of this Section, and shall include records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility, any malfunction of the air pollution control equipment; and any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 C.F.R. §§60.7 and 63.10, 40 CFR Parts 61, Subpart A, and OAC 252:100, Appendix Q]

H. The permittee of a facility that is operating subject to a schedule of compliance shall submit to the DEQ a progress report at least semi-annually. The progress reports shall contain dates for achieving the activities, milestones or compliance required in the schedule of compliance and the dates when such activities, milestones or compliance was achieved. The progress reports shall also contain an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted. [OAC 252:100-8-6(c)(4)]

I. All testing must be conducted under the direction of qualified personnel by methods approved by the Division Director. All tests shall be made and the results calculated in accordance with standard test procedures. The use of alternative test procedures must be approved by EPA. When a portable analyzer is used to measure emissions it shall be setup, calibrated, and operated in accordance with the manufacturer’s instructions and in accordance with a protocol meeting the requirements of the “AQD Portable Analyzer Guidance” document or an equivalent method approved by Air Quality.

[OAC 252:100-8-6(a)(3)(A)(iv), and OAC 252:100-43]

J. The reporting of total particulate matter emissions as required in Part 7 of OAC 252:100-8 (Permits for Part 70 Sources), OAC 252:100-19 (Control of Emission of Particulate Matter), and OAC 252:100-5 (Emission Inventory), shall be conducted in accordance with applicable testing or calculation procedures, modified to include back-half condensables, for the concentration of particulate matter less than 10 microns in diameter (PM₁₀). NSPS may allow reporting of only particulate matter emissions caught in the filter (obtained using Reference Method 5).

K. The permittee shall submit to the AQD a copy of all reports submitted to the EPA as required by 40 C.F.R. Part 60, 61, and 63, for all equipment constructed or operated under this permit subject to such standards. [OAC 252:100-8-6(c)(1) and OAC 252:100, Appendix Q]

SECTION IV. COMPLIANCE CERTIFICATIONS

A. No later than 30 days after each anniversary date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to the AQD, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit and of any other applicable requirements which have become effective since the issuance of this permit.

[OAC 252:100-8-6(c)(5)(A), and (D)]

B. The compliance certification shall describe the operating permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the methods used for determining compliance, currently and over the reporting period. The compliance certification shall also include such other facts as the permitting authority may require to determine the compliance status of the source.

[OAC 252:100-8-6(c)(5)(C)(i)-(v)]

C. The compliance certification shall contain a certification by a responsible official as to the results of the required monitoring. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

[OAC 252:100-8-5(f) and OAC 252:100-8-6(c)(1)]

D. Any facility reporting noncompliance shall submit a schedule of compliance for emissions units or stationary sources that are not in compliance with all applicable requirements. This schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the emissions unit or stationary source is in noncompliance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the emissions unit or stationary source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based, except that a compliance plan shall not be required for any noncompliance condition which is corrected within 24 hours of discovery.

[OAC 252:100-8-5(e)(8)(B) and OAC 252:100-8-6(c)(3)]

SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM

The permittee shall comply with any additional requirements that become effective during the permit term and that are applicable to the facility. Compliance with all new requirements shall be certified in the next annual certification.

[OAC 252:100-8-6(c)(6)]

SECTION VI. PERMIT SHIELD

A. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC 252:100-8) shall be deemed compliance with the applicable requirements identified and included in this permit.

[OAC 252:100-8-6(d)(1)]

B. Those requirements that are applicable are listed in the Standard Conditions and the Specific Conditions of this permit. Those requirements that the applicant requested be determined as not applicable are summarized in the Specific Conditions of this permit.

[OAC 252:100-8-6(d)(2)]

SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT

The permittee shall file with the AQD an annual emission inventory and shall pay annual fees based on emissions inventories. The methods used to calculate emissions for inventory purposes shall be based on the best available information accepted by AQD.

[OAC 252:100-5-2.1, OAC 252:100-5-2.2, and OAC 252:100-8-6(a)(8)]

SECTION VIII. TERM OF PERMIT

A. Unless specified otherwise, the term of an operating permit shall be five years from the date of issuance. [OAC 252:100-8-6(a)(2)(A)]

B. A source's right to operate shall terminate upon the expiration of its permit unless a timely and complete renewal application has been submitted at least 180 days before the date of expiration. [OAC 252:100-8-7.1(d)(1)]

C. A duly issued construction permit or authorization to construct or modify will terminate and become null and void (unless extended as provided in OAC 252:100-8-1.4(b)) if the construction is not commenced within 18 months after the date the permit or authorization was issued, or if work is suspended for more than 18 months after it is commenced. [OAC 252:100-8-1.4(a)]

D. The recipient of a construction permit shall apply for a permit to operate (or modified operating permit) within 180 days following the first day of operation. [OAC 252:100-8-4(b)(5)]

SECTION IX. SEVERABILITY

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[OAC 252:100-8-6 (a)(6)]

SECTION X. PROPERTY RIGHTS

A. This permit does not convey any property rights of any sort, or any exclusive privilege. [OAC 252:100-8-6(a)(7)(D)]

B. This permit shall not be considered in any manner affecting the title of the premises upon which the equipment is located and does not release the permittee from any liability for damage to persons or property caused by or resulting from the maintenance or operation of the equipment for which the permit is issued. [OAC 252:100-8-6(c)(6)]

SECTION XI. DUTY TO PROVIDE INFORMATION

A. The permittee shall furnish to the DEQ, upon receipt of a written request and within sixty (60) days of the request unless the DEQ specifies another time period, any information that the DEQ may request to determine whether cause exists for modifying, reopening, revoking, reissuing,

terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit.

[OAC 252:100-8-6(a)(7)(E)]

B. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 27A O.S. § 2-5-105(18). Confidential information shall be clearly labeled as such and shall be separable from the main body of the document such as in an attachment.

[OAC 252:100-8-6(a)(7)(E)]

C. Notification to the AQD of the sale or transfer of ownership of this facility is required and shall be made in writing within thirty (30) days after such sale or transfer.

[Oklahoma Clean Air Act, 27A O.S. § 2-5-112(G)]

SECTION XII. REOPENING, MODIFICATION & REVOCATION

A. The permit may be modified, revoked, reopened and reissued, or terminated for cause. Except as provided for minor permit modifications, the filing of a request by the permittee for a permit modification, revocation and reissuance, termination, notification of planned changes, or anticipated noncompliance does not stay any permit condition.

[OAC 252:100-8-6(a)(7)(C) and OAC 252:100-8-7.2(b)]

B. The DEQ will reopen and revise or revoke this permit prior to the expiration date in the following circumstances:

[OAC 252:100-8-7.3 and OAC 252:100-8-7.4(a)(2)]

- (1) Additional requirements under the Clean Air Act become applicable to a major source category three or more years prior to the expiration date of this permit. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit.
- (2) The DEQ or the EPA determines that this permit contains a material mistake or that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (3) The DEQ or the EPA determines that inaccurate information was used in establishing the emission standards, limitations, or other conditions of this permit. The DEQ may revoke and not reissue this permit if it determines that the permittee has submitted false or misleading information to the DEQ.
- (4) DEQ determines that the permit should be amended under the discretionary reopening provisions of OAC 252:100-8-7.3(b).

C. The permit may be reopened for cause by EPA, pursuant to the provisions of OAC 100-8-7.3(d).

[OAC 100-8-7.3(d)]

D. The permittee shall notify AQD before making changes other than those described in Section XVIII (Operational Flexibility), those qualifying for administrative permit amendments, or those defined as an Insignificant Activity (Section XVI) or Trivial Activity (Section XVII). The notification should include any changes which may alter the status of a “grandfathered source,” as defined under AQD rules. Such changes may require a permit modification.

[OAC 252:100-8-7.2(b) and OAC 252:100-5-1.1]

E. Activities that will result in air emissions that exceed the trivial/insignificant levels and that are not specifically approved by this permit are prohibited. [OAC 252:100-8-6(c)(6)]

SECTION XIII. INSPECTION & ENTRY

A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized regulatory officials to perform the following (subject to the permittee's right to seek confidential treatment pursuant to 27A O.S. Supp. 1998, § 2-5-105(17) for confidential information submitted to or obtained by the DEQ under this section):

- (1) enter upon the permittee's premises during reasonable/normal working hours where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (2) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (3) inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (4) as authorized by the Oklahoma Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit.

[OAC 252:100-8-6(c)(2)]

SECTION XIV. EMERGENCIES

A. Any exceedance resulting from an emergency shall be reported to AQD promptly but no later than 4:30 p.m. on the next working day after the permittee first becomes aware of the exceedance. This notice shall contain a description of the emergency, the probable cause of the exceedance, any steps taken to mitigate emissions, and corrective actions taken.

[OAC 252:100-8-6 (a)(3)(C)(iii)(I) and (IV)]

B. Any exceedance that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to AQD as soon as is practicable; but under no circumstance shall notification be more than 24 hours after the exceedance. [OAC 252:100-8-6(a)(3)(C)(iii)(II)]

C. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. [OAC 252:100-8-2]

D. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that: [OAC 252:100-8-6 (e)(2)]

- (1) an emergency occurred and the permittee can identify the cause or causes of the emergency;

- (2) the permitted facility was at the time being properly operated;
- (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.

E. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [OAC 252:100-8-6(e)(3)]

F. Every written report or document submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F. [OAC 252:100-8-6(a)(3)(C)(iv)]

SECTION XV. RISK MANAGEMENT PLAN

The permittee, if subject to the provision of Section 112(r) of the Clean Air Act, shall develop and register with the appropriate agency a risk management plan by June 20, 1999, or the applicable effective date. [OAC 252:100-8-6(a)(4)]

SECTION XVI. INSIGNIFICANT ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate individual emissions units that are either on the list in Appendix I to OAC Title 252, Chapter 100, or whose actual calendar year emissions do not exceed any of the limits below. Any activity to which a State or Federal applicable requirement applies is not insignificant even if it meets the criteria below or is included on the insignificant activities list.

- (1) 5 tons per year of any one criteria pollutant.
- (2) 2 tons per year for any one hazardous air pollutant (HAP) or 5 tons per year for an aggregate of two or more HAP's, or 20 percent of any threshold less than 10 tons per year for single HAP that the EPA may establish by rule.

[OAC 252:100-8-2 and OAC 252:100, Appendix I]

SECTION XVII. TRIVIAL ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate any individual or combination of air emissions units that are considered inconsequential and are on the list in Appendix J. Any activity to which a State or Federal applicable requirement applies is not trivial even if included on the trivial activities list.

[OAC 252:100-8-2 and OAC 252:100, Appendix J]

SECTION XVIII. OPERATIONAL FLEXIBILITY

A. A facility may implement any operating scenario allowed for in its Part 70 permit without the need for any permit revision or any notification to the DEQ (unless specified otherwise in the permit). When an operating scenario is changed, the permittee shall record in a log at the facility the scenario under which it is operating. [OAC 252:100-8-6(a)(10) and (f)(1)]

B. The permittee may make changes within the facility that:

- (1) result in no net emissions increases,
- (2) are not modifications under any provision of Title I of the federal Clean Air Act, and
- (3) do not cause any hourly or annual permitted emission rate of any existing emissions unit to be exceeded;

provided that the facility provides the EPA and the DEQ with written notification as required below in advance of the proposed changes, which shall be a minimum of seven (7) days, or twenty four (24) hours for emergencies as defined in OAC 252:100-8-6 (e). The permittee, the DEQ, and the EPA shall attach each such notice to their copy of the permit. For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The permit shield provided by this permit does not apply to any change made pursuant to this paragraph. [OAC 252:100-8-6(f)(2)]

SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS

A. The following applicable requirements and state-only requirements apply to the facility unless elsewhere covered by a more restrictive requirement:

- (1) Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter. [OAC 252:100-13]
- (2) No particulate emissions from any fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU. [OAC 252:100-19]
- (3) For all emissions units not subject to an opacity limit promulgated under 40 C.F.R., Part 60, NSPS, no discharge of greater than 20% opacity is allowed except for: [OAC 252:100-25]
 - (a) Short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity;
 - (b) Smoke resulting from fires covered by the exceptions outlined in OAC 252:100-13-7;
 - (c) An emission, where the presence of uncombined water is the only reason for failure to meet the requirements of OAC 252:100-25-3(a); or
 - (d) Smoke generated due to a malfunction in a facility, when the source of the fuel producing the smoke is not under the direct and immediate control of the facility and the immediate constriction of the fuel flow at the facility would produce a hazard to life and/or property.
- (4) No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of

adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]

- (5) No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]
- (6) Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system. [OAC 252:100-37-15(b)]
- (7) All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]

SECTION XX. STRATOSPHERIC OZONE PROTECTION

A. The permittee shall comply with the following standards for production and consumption of ozone-depleting substances: [40 CFR 82, Subpart A]

- (1) Persons producing, importing, or placing an order for production or importation of certain class I and class II substances, HCFC-22, or HCFC-141b shall be subject to the requirements of §82.4;
- (2) Producers, importers, exporters, purchasers, and persons who transform or destroy certain class I and class II substances, HCFC-22, or HCFC-141b are subject to the recordkeeping requirements at §82.13; and
- (3) Class I substances (listed at Appendix A to Subpart A) include certain CFCs, Halons, HBFCs, carbon tetrachloride, trichloroethane (methyl chloroform), and bromomethane (Methyl Bromide). Class II substances (listed at Appendix B to Subpart A) include HCFCs.

B. If the permittee performs a service on motor (fleet) vehicles when this service involves an ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all applicable requirements. Note: The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant. [40 CFR 82, Subpart B]

C. The permittee shall comply with the following standards for recycling and emissions reduction except as provided for MVACs in Subpart B: [40 CFR 82, Subpart F]

- (1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156;
- (2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158;
- (3) Persons performing maintenance, service, repair, or disposal of appliances must be

- certified by an approved technician certification program pursuant to § 82.161;
- (4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166;
 - (5) Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.158; and
 - (6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

SECTION XXI. TITLE V APPROVAL LANGUAGE

A. DEQ wishes to reduce the time and work associated with permit review and, wherever it is not inconsistent with Federal requirements, to provide for incorporation of requirements established through construction permitting into the Source's Title V permit without causing redundant review. Requirements from construction permits may be incorporated into the Title V permit through the administrative amendment process set forth in OAC 252:100-8-7.2(a) only if the following procedures are followed:

- (1) The construction permit goes out for a 30-day public notice and comment using the procedures set forth in 40 C.F.R. § 70.7(h)(1). This public notice shall include notice to the public that this permit is subject to EPA review, EPA objection, and petition to EPA, as provided by 40 C.F.R. § 70.8; that the requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process; that the public will not receive another opportunity to provide comments when the requirements are incorporated into the Title V permit; and that EPA review, EPA objection, and petitions to EPA will not be available to the public when requirements from the construction permit are incorporated into the Title V permit.
- (2) A copy of the construction permit application is sent to EPA, as provided by 40 CFR § 70.8(a)(1).
- (3) A copy of the draft construction permit is sent to any affected State, as provided by 40 C.F.R. § 70.8(b).
- (4) A copy of the proposed construction permit is sent to EPA for a 45-day review period as provided by 40 C.F.R. § 70.8(a) and (c).
- (5) The DEQ complies with 40 C.F.R. § 70.8(c) upon the written receipt within the 45-day comment period of any EPA objection to the construction permit. The DEQ shall not issue the permit until EPA's objections are resolved to the satisfaction of EPA.
- (6) The DEQ complies with 40 C.F.R. § 70.8(d).
- (7) A copy of the final construction permit is sent to EPA as provided by 40 CFR § 70.8(a).
- (8) The DEQ shall not issue the proposed construction permit until any affected State and EPA have had an opportunity to review the proposed permit, as provided by these permit conditions.
- (9) Any requirements of the construction permit may be reopened for cause after incorporation into the Title V permit by the administrative amendment process, by DEQ as provided in OAC 252:100-8-7.3(a), (b), and (c), and by EPA as provided in 40 C.F.R. § 70.7(f) and (g).

- (10) The DEQ shall not issue the administrative permit amendment if performance tests fail to demonstrate that the source is operating in substantial compliance with all permit requirements.

B. To the extent that these conditions are not followed, the Title V permit must go through the Title V review process.

SECTION XXII. CREDIBLE EVIDENCE

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any provision of the Oklahoma implementation plan, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [OAC 252:100-43-6]

The Goodyear Tire & Rubber Company
Attn: Richard Pepper
1 SW Goodyear Boulevard
Lawton, OK 73505

SUBJECT: Permit No. **2011-0440-C (M-16) PSD**
Goodyear Lawton
AQD Facility ID: 662
1 SW Goodyear Boulevard, Lawton, OK 73505
Section 36, Township 2N, Range 13W, Comanche County, Oklahoma

Dear Mr. Pepper,

Air Quality has received the permit application for the referenced facility and completed initial review. This application has been determined to be a Tier II application. In accordance with 27A O.S. 2-14-301 and 302 and OAC 252:4-7-13(c), the enclosed draft permit is now ready for public review. The requirements for public review of the application and draft permit include the following steps, which **you** must accomplish:

1. Publish at least one legal notice (one day) for the Notice of Tier II Draft Permit in at least one newspaper of general circulation within the county where the facility is located (Instructions enclosed);
2. Submit sample notice and provide date of publication to **AQD 5 days prior to notice publishing;**
3. Provide for public review, for a period of 30 days following the date of the newspaper announcement, a copy of the application and draft permit at a convenient location (preferentially at a public location) within the county of the facility;
4. Send AQD a signed affidavit of publication for the notice(s) from Item #1 above within 20 days of publication of the draft permit. Any additional comments or requested changes you have for the draft permit or the application should be submitted within 30 days of publication.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or the permit writer at (405) 702-4100.

Sincerely,



Phillip Fielder, P.E.
Chief Engineer
AIR QUALITY DIVISION

NOTICE OF DRAFT PERMIT TIER II or TIER III AIR QUALITY PERMIT APPLICATION

APPLICANT RESPONSIBILITIES

Permit applicants are required to give public notice that a Tier II or Tier III draft permit has been prepared by DEQ. The notice must be published in one newspaper local to the site or facility. Note that if either the applicant or the public requests a public meeting, this must be arranged by the DEQ.

1. Complete the public notice using the samples provided by AQD below. Please use the version applicable to the requested permit action;
Version 1 – Traditional NSR process for a construction permit
Version 2 – Enhanced NSR process for a construction permit
Version 3 – initial Title V (Part 70 Source) operating permit, Title V operating permit renewal, Significant Modification to a Title V operating permit, and any Title V operating permit modification incorporating a construction permit that followed Traditional NSR process
2. Determine appropriate newspaper local to facility for publishing;
3. Submit sample notice and provide date of publication to AQD 5 days prior to notice publishing;
4. Upon publication, a signed affidavit of publication must be obtained from the newspaper and sent to AQD.

REQUIRED CONTENT (27A O.S. § 2-14-302 and OAC 252:4-7-13(c))

1. A statement that a Tier II or Tier III draft permit has been prepared by DEQ;
2. Name and address of the applicant;
3. Name, address, driving directions, legal description and county of the site or facility;
4. The type of permit or permit action being sought;
5. A description of activities to be regulated, including an estimate of emissions from the facility;
6. Location(s) where the application and draft permit may be reviewed (a location in the county where the site/facility is located must be included);
7. Name, address, and telephone number of the applicant and DEQ contacts;
8. Any additional information required by DEQ rules or deemed relevant by applicant;
9. A 30-day opportunity to request a formal public meeting on the draft permit.

SAMPLE NOTICE (*Italicized print is to be filled in by the applicant.*):

DEQ NOTICE OF TIER ...II or III... DRAFT PERMIT

A Tier ...II or III... application for an air quality ...type of permit or permit action being sought (e.g., construction permit for a new major facility or construction permit for a modification at an existing major facility)... has been filed with the Oklahoma Department of Environmental Quality (DEQ) by applicant, ...name and address.

The applicant requests approval to ...brief description of purpose of application... at the ...site/facility name ... [proposed to be] located at ...physical address (if any), driving directions, and legal description including county....

In response to the application, DEQ has prepared a draft construction permit [modification] (Permit Number: ...xxx-xxx-x...), which may be reviewed at ...locations (one must be in the county where the site/facility is located)... or at the Air Quality Division's main office (see address below). The draft permit is also available for review under Permits for Public Review on the DEQ Web Page: <https://www.deq.ok.gov/>

This draft permit would authorize the facility to emit the following regulated pollutants: (list each pollutant and amounts in tons per year (TPY)). [For facility modifications only, either add the phrase: , which represents (identify the emissions change involved in the modification)., or add the sentence: The modification will not result in a change in emissions.] [For PSD permits only, add: The project will consume the following increment levels: (list the amount of increment consumption for each pollutant in ug/m³).]

The public comment period ends 30 days after the date of publication of this notice. Any person may submit written comments concerning the draft permit to the Air Quality Division contact listed below or as directed through the corresponding online notice. [Modifications only, add: Only those issues relevant to the proposed modification(s) are open for comment.] A public meeting on the draft permit [modification] may also be requested in writing at the same address. Note that all public meetings are to be arranged and conducted by DEQ staff.

Information on all permit actions including draft permits, proposed permits, final issued permits and applicable review timelines are available in the Air Quality section of the DEQ Web page: <https://www.deq.ok.gov/>.

For additional information, contact ...names, addresses and telephone numbers of contact persons for the applicant, or contact DEQ at: Chief Engineer, Air Quality Division, 707 N. Robinson, Suite 4100, P.O. Box 1677, Oklahoma City, OK, 73101-1677. Phone No. (405) 702-4100.

Texas Commission on Environmental Quality
Air Permits Division (MC 163)
P.O. Box 13087
Austin, TX 78711-3087

SUBJECT: Permit Number: **2011-0440-C (M-16) PSD**
Company: The Goodyear Tire & Rubber Company
Facility: Goodyear Lawton
1 SW Goodyear Boulevard, Lawton, OK 73505
Section 36, Township 2N, Range 13W, Comanche County, Oklahoma
Permit Writer: Joseph K. Wills, P.E.

Dear Sir / Madame:

The subject facility has requested a PSD construction permit for a significant modification. Air Quality Division has completed the initial review of the application and prepared a draft permit for public review. Since this facility is within 50 miles of the Oklahoma - **Texas** border, a copy of the draft permit will be provided to you upon request. The draft permit is also available for review on the Air Quality section of the DEQ web page at <https://www.deq.ok.gov>.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or the permit writer at (405) 702-4100.

Sincerely,



Phillip Fielder, P.E.
Chief Engineer
AIR QUALITY DIVISION

City of Lawton
Attn: Michael Cleghorn, City Manager
212 SW Ninth Street,
Lawton, OK 73501

SUBJECT: Permit Number: **2011-0440-C (M-16) PSD**
Company: The Goodyear Tire & Rubber Company
Facility: Goodyear Lawton
1 SW Goodyear Boulevard, Lawton, OK 73505
Section 36, Township 2N, Range 13W, Comanche County, Oklahoma
Permit Writer: Joseph K. Wills, P.E.

Dear Mr. Cleghorn:

The subject facility has requested a PSD construction permit for a significant modification. Air Quality Division has completed the initial review of the application and prepared a draft permit for public review. Since this facility located within the vicinity of the City of Lawton, a copy of the draft permit will be provided to you upon request. The draft permit is also available for review on the Air Quality section of the DEQ web page at <https://www.deq.ok.gov>.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or the permit writer at (405) 702-4100.

Sincerely,



Phillip Fielder, P.E.
Chief Engineer
AIR QUALITY DIVISION