



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL
SUMMIT COUNTY**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 16-02188

DATE: 1/10/2002

Goodyear Tire/Rubber Plant V
Ramon Dimascio
142 Goodyear Blvd
Akron, OH 44306

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

ARAQMD



**Permit To Install
Terms and Conditions**

**Issue Date: 1/10/2002
Effective Date: 1/10/2002**

FINAL PERMIT TO INSTALL 16-02188

Application Number: 16-02188
APS Premise Number: 1677010196
Permit Fee: **\$1600**
Name of Facility: Goodyear Tire/Rubber Plant V
Person to Contact: Ramon Dimascio
Address: 142 Goodyear Blvd
Akron, OH 44306

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1452 East Archwood Street
Akron, Ohio**

Description of proposed emissions unit(s):
Modification to split P005 into separate emissions units, including new emissions limits, and establish new emissions limits for P006.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

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representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

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Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

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14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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Issued: 1/10/2002

Emissions Unit ID: **P006**
Facility ID: **1677010196**

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OCs	12.6

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<p>P006 Emulsion Pilot Plant pilot scale research/production development of emulsion polymers using butadiene & styrene monomers; batch operations; air streams containing butadiene monomer from BD washing and degassing have a heat content of greater than 300 BTU/cubic foot and are vented to a flare stack with an implied 98% organic compound (OC) destruction efficiency; air streams containing butadiene and styrene monomers from steam stripping have a heat content of less than 300 BTU/cubic foot and are initially vented to a condenser with an assumed 94% styrene/0% butadiene removal efficiency and finally to a flare stack with an assumed 0% OC destruction efficiency; air emissions of OCs from cleaning operations uncontrolled; MODIFICATION per PTI 16-02188 (no previous PTI issued) to establish new emission limits based on revised emissions determination methodology</p>	<p>OAC rule 3745-31-05 (A)(3) OAC rule 3745-21-07 (G)(2)</p>	<p>4.0 pounds/hour of OCs; 26.5 pounds/day of OCs; and 0.8 ton/year of OCs The OC emission limitations required by OAC rule 3745-21-07 (G)(2) are less stringent than the OC emission limitations established pursuant to OAC rule 3745-31-05 (A)(3).</p>

2. Additional Terms and Conditions

- 2.a** As determined from the application, the OC emission limitations regulated per OAC rule 3745-31-05 (A)(3) are based upon the controlled (flare & condenser operating) potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with these emission limits. However, if any proposed change(s), such as with process raw materials, latex formulations, polymerization efficiency, monomer contents, production capacity, cleanup materials, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).
- 2.b** The permittee shall properly install (or have installed), adjust, operate, and maintain, in accordance with the manufacturer's recommendations, instructions, and operating manual(s), a condenser, or comparable air pollution control device, to reduce air emissions of styrene from this emissions unit. Furthermore, the permittee shall properly install (or have installed), adjust, operate, and maintain, in accordance with good engineering design and practice, hoods, ducts, fans, and any other equipment necessary to capture, contain, and vent air emissions of styrene to the applicable air pollution control device.
- 2.c** The permittee shall properly install (or have installed), adjust, operate, and maintain, in accordance with the manufacturer's recommendations, instructions, and operating manual(s), a flare, or comparable air pollution control device, to reduce air emissions of OCs from this emissions unit. Furthermore, the permittee shall properly install (or have installed), adjust, operate, and maintain, in accordance with good engineering design and practice, hoods, ducts, fans, and any other equipment necessary to capture, contain, and vent air emissions of OCs to the applicable air pollution control device.
- 2.d** The condensate from the condenser shall be properly identified and collected in a closed vessel and transferred to a closed storage drum for appropriate off-site disposal.
- 2.e** All raw/discarded process materials and clean/used cleanup solvents shall be properly identified and held in closed storage vessels or closed containers at all times when not in use or for appropriate off-site disposal.

B. Operational Restrictions

1. The condenser and flare shall be employed at all times the emissions unit is in operation.
2. The average temperature of the exhaust gases from the condenser, for any 3-hour block of time, shall not be greater than 95 degrees Fahrenheit.

3. The arcing of the flare's electric arc ignition system shall pulse continually.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. The average temperature of the exhaust gases from the condenser during each of the 8 3-hour blocks of time during the day.
 - b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
2. The permittee shall properly install, operate, and maintain a device to continuously monitor the electric arc ignition system when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record the following information each day:

- a. All periods during which the electric arc system was inoperable.
- b. The operating times for the flare, monitoring equipment, and the associated emissions unit.

D. Reporting Requirements

1. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases from the condenser exceeded the temperature limitation specified above.
2. The permittee shall submit deviation (excursion) reports that identify all periods during which the electric arc ignition system was not functioning properly. The reports shall include the date, time, and duration of each such period.
3. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 2 of this permit.

E. Testing Requirements

1. Compliance with the above OC emission limitations regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "P006 Emulsion Pilot Plant Calculations" by RJ DiMascio (revised 11/28/01) included in the application.

Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA reference methods, to establish precise and representative emission limitations for this emissions unit.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P011 Solution Pilot Plant: Isoprene Still Unit (formerly a component of P005) pilot scale distillation of isoprene to remove unwanted dimer contamination; batch operations; air streams containing organic compounds (OCs) from this emissions unit have a heat content of less than 300 BTU/cubic foot and are vented to a flare stack with an assumed 0% OC destruction efficiency; MODIFICATION per PTI 16-02188 (no previous PTI issued) to establish new emission limits based on revised emissions determination methodology	OAC rule 3745-31-05 (A)(3) OAC rule 3745-21-07 (G)(2)	5.5 pounds/hour of OCs; 35.6 pounds/day of OCs; and 1.7 tons/year of OCs The OC emission limitations required by OAC rule 3745-21-07 (G)(2) are less stringent than the OC emission limitations established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

- 2.a As determined from the application, the OC emission limitations regulated per OAC rule 3745-31-05 (A)(3) are based upon the potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with these emission limits. However, if any proposed change(s), such as with process raw materials, production capacity, cleanup materials, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

- 2.b** All raw/discarded process materials and clean/used cleanup solvents shall be properly identified and held in closed storage vessels or closed containers at all times when not in use or for appropriate off-site disposal.

B. Operational Restrictions

NONE

C. Monitoring and/or Recordkeeping Requirements

NONE

D. Reporting Requirements

NONE

E. Testing Requirements

1. Compliance with the above OC emission limitations regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "SPP Isoprene Still PTE" by RJ DiMascio (9/17/01) included in the application.

Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA reference methods, to establish precise and representative emission limitations for this emissions unit.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P012 Solution Pilot Plant: Premix and Reactor Feed Preparation Area (formerly a component of P005) pilot scale premix feed tanks, drying beds, and additive make-up tanks; batch operations; air streams containing organic compounds (OCs) from this emissions unit have a heat content of less than 300 BTU/cubic foot and are vented to a flare stack with an assumed 0% OC destruction efficiency; MODIFICATION per PTI 16-02188 (no previous PTI issued) to establish new emission limits based on revised emissions determination methodology	OAC rule 3745-31-05 (A)(3) OAC rule 3745-21-07 (G)(2)	5.0 pounds/hour of OCs; 32.4 pounds/day of OCs; and 2.1 tons/year of OCs The OC emission limitations required by OAC rule 3745-21-07 (G)(2) are less stringent than the OC emission limitations established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

- 2.a As determined from the application, the OC emission limitations regulated per OAC rule 3745-31-05 (A)(3) are based upon the potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with these emission limits. However, if any proposed change(s), such as with process raw materials, production capacity, cleanup materials, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

- 2.b** All raw/discarded process materials and clean/used cleanup solvents shall be properly identified and held in closed storage vessels or closed containers at all times when not in use or for appropriate off-site disposal.

B. Operational Restrictions

NONE

C. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual process materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxics Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 1,3-butadiene (CAS 106-99-0)
TLV (ug/m3): 4,400
Maximum Hourly Emission Rate (lbs/hr): 5.0
Predicted 1-Hour Maximum Ground-Level Concentration at 125 m (ug/m3): 85
MAGLC (ug/m3): 105
2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxics Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:
 - a. changes in the composition of the materials used (process materials and cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxics Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- 3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the emissions unit, if changed as outlined above, will still satisfy the "Air Toxics Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxics Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxics Policy" for the change.

D. Reporting Requirements

NONE

E. Testing Requirements

- 1. Compliance with the above OC emission limitations regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "Premix" by RJ DiMascio (9/14/01) included in the application.

Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA

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Emissions Unit ID: **P012**

reference methods, to establish precise and representative emission limitations for this emissions unit.

F. Miscellaneous Requirements

NONE

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P013 Solution Pilot Plant: Polymerization Reactors (formerly a component of P005) pilot scale polymerization reactors; batch and continuous operations; air streams containing organic compounds (OCs) from this emissions unit have a heat content of less than 300 BTU/cubic foot and are vented to a flare stack with an assumed 0% OC destruction efficiency; MODIFICATION per PTI 16-02188 (no previous PTI issued) to establish new emission limits based on revised emissions determination methodology	OAC rule 3745-31-05 (A)(3) OAC rule 3745-21-07 (G)(2)	1.5 pounds/hour of OCs; 13.4 pounds/day of OCs; and 0.6 ton/year of OCs The OC emission limitations required by OAC rule 3745-21-07 (G)(2) are less stringent than the OC emission limitations established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

- 2.a As determined from the application, the OC emission limitations regulated per OAC rule 3745-31-05 (A)(3) are based upon the potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with these emission limits. However, if any proposed change(s), such as with process raw materials, production capacity, cleanup materials, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

- 2.b** All raw/discarded process materials and clean/used cleanup solvents shall be properly identified and held in closed storage vessels or closed containers at all times when not in use or for appropriate off-site disposal.

B. Operational Restrictions

NONE

C. Monitoring and/or Recordkeeping Requirements

NONE

D. Reporting Requirements

NONE

E. Testing Requirements

1. Compliance with the above OC emission limitations regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "Reactors" by RJ DiMascio (9/14/01) included in the application.

Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA reference methods, to establish precise and representative emission limitations for this emissions unit.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P014 Solution Pilot Plant: Finishing Unit (formerly a component of P005) pilot scale polymer finishing; batch and continuous operations; air streams containing organic compounds (OCs) from this emissions unit have a heat content of less than 300 BTU/cubic foot and are vented to a flare stack with an assumed 0% OC destruction efficiency; MODIFICATION per PTI 16-02188 (no previous PTI issued) to establish new emission limits based on revised emissions determination methodology	OAC rule 3745-31-05 (A)(3) OAC rule 3745-21-07 (G)	12.9 pounds/hour of OCs; and 2.0 tons/year of OCs The permittee shall not use any photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5), in this emissions unit. Exempt from the requirements of OAC rule 3745-21-07 (G)(2) in accordance with OAC rule 3745-21-07 (G)(9).

2. Additional Terms and Conditions

- 2.a As determined from the application, the OC emission limitations regulated per OAC rule 3745-31-05 (A)(3) are based upon the potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with these emission limits. However, if any proposed change(s), such as with process raw materials, production capacity, cleanup materials, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).
- 2.b All raw/discarded process materials and clean/used cleanup solvents shall be properly

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Emissions Unit ID: **P014**

identified and held in closed storage vessels or closed containers at all times when not in use or for appropriate off-site disposal.

B. Operational Restrictions

NONE

C. Monitoring and/or Recordkeeping Requirements

1. If the permittee uses in this emissions unit photochemically reactive materials (PRMs), as defined by OAC rule 3745-21-01 (C)(5), the following information shall be recorded:
 - a. the date(s) and identification of the PRMs used in this emissions unit;
 - b. the total OC emissions, in pounds, from the emissions unit for each date PRMs are used, excluding OC emissions from non photochemically reactive cleanup materials;
 - c. the total actual hours of operation for the emissions unit for each date PRMs are used; and
 - d. the average hourly total OC emissions, in pounds/hour, from the emissions unit for each date PRMs are used, excluding OC emissions from non photochemically reactive cleanup materials, i.e., $d = b/c$.
2. The permit to install for this emissions unit was evaluated based on the actual process materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxics Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-hexane (CAS 110-54-3)
TLV (ug/m3): 176,000
Maximum Hourly Emission Rate (lbs/hr): 12.9
Predicted 1-Hour Maximum Ground-Level Concentration at 83 m (ug/m3): 576.6
MAGLC (ug/m3): 4190
3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such

parameters, the permittee shall conduct an evaluation to determine that the "Air Toxics Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:

- a. changes in the composition of the materials used (process materials and cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxics Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the emissions unit, if changed as outlined above, will still satisfy the "Air Toxics Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxics Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxics Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports identifying the date(s) PRMs, as defined

Goodyear Tire/Rubber Plant V

PTI Application: 16-02100

Issued

Facility ID: 1677010196

Emissions Unit ID: **P014**

by OAC rule 3745-21-01 (C)(5), were used in this emissions unit, and the daily and average hourly total OC emissions from the emissions unit, excluding OC emissions from non photochemically reactive cleanup materials, in pounds and pounds/hour, respectively, for each such date.

2. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 2 of this permit.

E. Testing Requirements

1. Compliance with the above OC emission limitations regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "SPP Finishing" by RJ DiMascio (12/12/01) included in the application.

Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA reference methods, to establish precise and representative emission limitations for this emissions unit.

F. Miscellaneous Requirements

NONE

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T016 Solution Pilot Plant: T-1040 Cement Storage Tank (formerly a component of P005) 1200-gallon capacity, vertical fixed roof, submerged fill, storing volatile photochemically reactive materials; air streams containing organic compounds (OCs) from this emissions unit have a heat content of less than 300 BTU/cubic foot and are vented to a flare stack with an assumed 0% OC destruction efficiency; MODIFICATION per PTI 16-02188 (no previous PTI issued) to establish new emission limits based on revised emissions determination methodology	OAC rule 3745-31-05 (A)(3)	1.1 tons/year of OCs The permittee shall install, or have installed, a permanent "submerged fill pipe", as defined by OAC rule 3745-21-01 (C)(6).
	OAC rule 3745-21-07 (D)(2)	See section B.1 below.

2. Additional Terms and Conditions

- 2.a As determined from the application, the OC emission limitation regulated per OAC rule 3745-31-05 (A)(3) is based upon the potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with this emission limit. However, if any proposed change(s), such as with stored contents, physical construction or design of the storage vessel, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

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Emissions Unit ID: **T016**

B. Operational Restrictions

1. No person shall place, store, or hold in any stationary storage vessel of more than five hundred gallons capacity any volatile photochemically reactive material, as defined by OAC rule 3745-21-01(C)(7), unless such vessel is equipped with a permanent submerged fill pipe, is loaded through the use of a portable loading tube which can be inserted below the liquid level line during loading operations, or is a pressure tank as described in paragraph (D)(1) of OAC rule 3745-21-07 or is fitted with a vapor recovery system as described in paragraph (D)(1)(b) of OAC rule 3745-21-07.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep readily accessible records, for the life of the emissions unit, listing the dimensions, capacity, and chemical description of the stored contents of the storage vessel.

D. Reporting Requirements

NONE

E. Testing Requirements

1. Compliance with the above OC emission limitation regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "SPP T-4000 System PTE" by RJ DiMascio (9/17/01) included in the application.

Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA reference methods, to establish precise and representative emission limitations for this emissions unit.

F. Miscellaneous Requirements

NONE

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T017 Solution Pilot Plant: T-4000 Cement Storage Tank (formerly a component of P005) 3600-gallon capacity, vertical fixed roof, submerged fill, storing volatile photochemically reactive materials; air streams containing organic compounds (OCs) from this emissions unit have a heat content of less than 300 BTU/cubic foot and are vented to a flare stack with an assumed 0% OC destruction efficiency; MODIFICATION per PTI 16-02188 (no previous PTI issued) to establish new emission limits based on revised emissions determination methodology	OAC rule 3745-31-05 (A)(3) OAC rule 3745-21-07 (D)(2)	1.1 tons/year of OCs The permittee shall install, or have installed, a permanent "submerged fill pipe", as defined by OAC rule 3745-21-01 (C)(6). See section B.1 below.

2. Additional Terms and Conditions

- 2.a As determined from the application, the OC emission limitation regulated per OAC rule 3745-31-05 (A)(3) is based upon the potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with this emission limit. However, if any proposed change(s), such as with stored contents, physical construction or design of the storage vessel, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

B. Operational Restrictions

1. No person shall place, store, or hold in any stationary storage vessel of more than five hundred gallons capacity any volatile photochemically reactive material, as defined by OAC rule 3745-21-01(C)(7), unless such vessel is equipped with a permanent submerged fill pipe, is loaded through the use of a portable loading tube which can be inserted below the liquid level line during loading operations, or is a pressure tank as described in paragraph (D)(1) of OAC rule 3745-21-07 or is fitted with a vapor recovery system as described in paragraph (D)(1)(b) of OAC rule 3745-21-07.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep readily accessible records, for the life of the emissions unit, listing the dimensions, capacity, and chemical description of the stored contents of the storage vessel.

D. Reporting Requirements

NONE

E. Testing Requirements

1. Compliance with the above OC emission limitation regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "SPP T-4000 System PTE" by RJ DiMascio (9/17/01) included in the application.

Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA reference methods, to establish precise and representative emission limitations for this emissions unit.

F. Miscellaneous Requirements

NONE

B. Operational Restrictions

NONE

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep readily accessible records, for the life of the emissions unit, listing the dimensions and capacity of the storage vessel, and whether or not the vessel contents are photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5).

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports identifying the date(s) photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5), were in this emissions unit.
2. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 2 of this permit.

E. Testing Requirements

1. Compliance with the above OC emission limitation regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "SPP Cement Tanks PTE" by RJ DiMascio (9/20/01) included in the application.

Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA reference methods, to establish precise and representative emission limitations for this emissions unit.

F. Miscellaneous Requirements

NONE

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T019 Solution Pilot Plant: T-3404 Cement Storage Tank (formerly a component of P005) 5700-gallon capacity, vertical fixed roof, storing non photochemically reactive materials; air streams containing organic compounds (OCs) from this emissions unit have a heat content of less than 300 BTU/cubic foot and are vented to a flare stack with an assumed 0% OC destruction efficiency; MODIFICATION per PTI 16-02188 (no previous PTI issued) to establish new emission limits based on revised emissions determination methodology	OAC rule 3745-31-05 (A)(3) OAC rule 3745-21-07 (D)	0.8 ton/year of OCs The permittee shall not place, store, or hold any photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5), in this emissions unit. The OC emission control requirements of OAC rule 3745-21-07 (D) are less stringent than the OC emission control requirements established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

- 2.a As determined from the application, the OC emission limitation regulated per OAC rule 3745-31-05 (A)(3) is based upon the potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with this emission limit. However, if any proposed change(s), such as with stored contents, physical construction or design of the storage vessel, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

B. Operational Restrictions

NONE

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep readily accessible records, for the life of the emissions unit, listing the dimensions and capacity of the storage vessel, and whether or not the vessel contents are photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5).

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports identifying the date(s) photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5), were in this emissions unit.
2. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 2 of this permit.

E. Testing Requirements

1. Compliance with the above OC emission limitation regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "SPP Cement Tanks PTE" by RJ DiMascio (9/20/01) included in the application.

Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA reference methods, to establish precise and representative emission limitations for this emissions unit.

F. Miscellaneous Requirements

NONE

B. Operational Restrictions

NONE

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep readily accessible records, for the life of the emissions unit, listing the dimensions and capacity of the storage vessel, and whether or not the vessel contents are photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5).

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports identifying the date(s) photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5), were in this emissions unit.
2. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 2 of this permit.

E. Testing Requirements

1. Compliance with the above OC emission limitation regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "SPP Cement Tanks PTE" by RJ DiMascio (9/20/01) included in the application.

Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA reference methods, to establish precise and representative emission limitations for this emissions unit.

F. Miscellaneous Requirements

NONE

B. Operational Restrictions

NONE

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep readily accessible records, for the life of the emissions unit, listing the dimensions and capacity of the storage vessel, and whether or not the vessel contents are photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5).

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports identifying the date(s) photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5), were in this emissions unit.
2. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 2 of this permit.

E. Testing Requirements

1. Compliance with the above OC emission limitation regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "SPP Cement Tanks PTE" by RJ DiMascio (9/20/01) included in the application.

Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA reference methods, to establish precise and representative emission limitations for this emissions unit.

F. Miscellaneous Requirements

NONE

NEW SC

PTI Num

FACILITY

Emissions Unit ID: **T021**

FACILITY DESCRIPTION Modification to split P005 into separate emissions units, including new emissions limits, and establish new emissions limits for P006

CITY/TWP Akron

SIC CODE 2822 SCC CODE 3-01-026-99 EMISSIONS UNIT ID P006

EMISSIONS UNIT DESCRIPTION Emulsion Pilot Plant

DATE INSTALLED N/A

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds				4.0 lbs/hr	0.8
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
condenser & flare

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 16-02188

Facility ID: 1677010196

FACILITY NAME Goodyear Tire/Rubber Plant V

FACILITY DESCRIPTION Modification to split P005 into separate CITY/TWP Akron

Emissions Unit ID: **T021**

SIC CODE 2822 SCC CODE 3-01-026-15 EMISSIONS UNIT ID P011

EMISSIONS UNIT DESCRIPTION Solution Pilot Plant/Isoprene Still Unit

DATE INSTALLED N/A

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds				5.5 lbs/hr	1.7
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

compliance with all terms/conditions of this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SC

PTI Num

FACILITY

Emissions Unit ID: **T021**

FACILITY DESCRIPTION Modification to split P005 into separate emissions units, including new emissions limits, and establish new emissions limits for P006

CITY/TWP Akron

SIC CODE 2822 SCC CODE 3-01-026-99 EMISSIONS UNIT ID P012

EMISSIONS UNIT DESCRIPTION Solution Pilot Plant/Premix and Reactor Feed Preparation Area

DATE INSTALLED N/A

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds				5.0 lbs/hr	2.1
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

compliance with Air Toxics Policy

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: butadiene

NEW SOURCE REVIEW FORM B

PTI Number: 16-02188

Facility ID: 1677010196

FACILITY NAME Goodyear Tire/Rubber Plant V

FACILITY DESCRIPTION Modification to split P005 into separate CITY/TWP Akron

Emissions Unit ID: **T021**

SIC CODE 2822

SCC CODE 3-01-026-99

EMISSIONS UNIT ID P014

EMISSIONS UNIT DESCRIPTION Solution Pilot Plant/Finishing Unit

DATE INSTALLED N/A

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds				12.9 lbs/hr	2.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

compliance with Air Toxics Policy

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: n-hexane

NEW SC

PTI Num

FACILITY

Emissions Unit ID: **T021**

FACILITY DESCRIPTION Modification to split P005 into separate emissions units, including new emissions limits, and establish new emissions limits for P006

CITY/TWP Akron

SIC CODE 2822 SCC CODE 4-07-999-97 EMISSIONS UNIT ID T016

EMISSIONS UNIT DESCRIPTION Solution Pilot Plant/T-1040 Cement Storage Tank

DATE INSTALLED N/A

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					1.1
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

submerged fill

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 16-02188

Facility ID: 1677010196

FACILITY NAME Goodyear Tire/Rubber Plant V

FACILITY DESCRIPTION Modification to split P005 into separate CITY/TWP Akron

Emissions Unit ID: T021

SIC CODE 2822

SCC CODE 4-07-999-97

EMISSIONS UNIT ID T017

EMISSIONS UNIT DESCRIPTION Solution Pilot Plant/T-4000 Cement Storage Tank

DATE INSTALLED N/A

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					1.1
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

submerged fill

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SC

PTI Num

FACILITY

Emissions Unit ID: **T021**

FACILITY DESCRIPTION Modification to split P005 into separate emissions units, including new emissions limits, and establish new emissions limits for P006

CITY/TWP Akron

SIC CODE 2822 SCC CODE 4-07-999-97 EMISSIONS UNIT ID T019

EMISSIONS UNIT DESCRIPTION Solution Pilot Plant/T-3404 Cement Storage Tank

DATE INSTALLED N/A

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					0.8
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

storage of non photochemically reactive materials

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 16-02188

Facility ID: 1677010196

FACILITY NAME Goodyear Tire/Rubber Plant V

FACILITY DESCRIPTION Modification to split P005 into separate CITY/TWP Akron

Emissions Unit ID: T021

SIC CODE 2822

SCC CODE 4-07-999-97

EMISSIONS UNIT ID T020

EMISSIONS UNIT DESCRIPTION Solution Pilot Plant/T-3405 Cement Storage Tank

DATE INSTALLED N/A

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					0.8
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

storage of non photochemically reactive materials

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

5 NEW SOURCE REVIEW FORM B

PTI Number: 16-02188

Facility ID: 1677010196

FACILITY NAME Goodyear Tire/Rubber Plant V

FACILITY DESCRIPTION Modification to split P005 into separate CITY/TWP Akron

Emissions Unit ID: **T021**

SIC CODE 2822

SCC CODE 4-07-999-97

EMISSIONS UNIT ID T021

EMISSIONS UNIT DESCRIPTION Solution Pilot Plant/T-3406 Cement Storage Tank

DATE INSTALLED N/A

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					0.8
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

storage of non photochemically reactive materials

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

PTI Num

FACILITY

Emissions Unit ID: T021

FACILITY DESCRIPTION

Modification to split P005 into separate emissions units, including new emissions limits, and establish new emissions limits for P006

CITY/TWP Akron

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input type="checkbox"/>	0000000c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

NONE

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or Netting Determination

Permit To Install ENTER PTI NUMBER HERE

A. Source Description

B. Facility Emissions and Attainment Status

C. Source Emissions

D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

Comprehensive extensive emissions calculations contained in the application.

Please complete:

SUMMARY (for informational purposes only)

53 NEW SOURCE REVIEW FORM B

PTI Number: 16-02188

Facility ID: 1677010196

FACILITY NAME Goodyear Tire/Rubber Plant V

FACILITY DESCRIPTION Modification to split P005 into separate CITY/TWP Akron

Emissions Unit ID: **T021**

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant

Tons Per Year

OCs

12.6