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Facility Name: **Goodyear Tire and Rubber Company**

Application Number: **03-0885**

Date: **May 20, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

The proposed source(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 Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio 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 Ohio Administrative Code

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(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 prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

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PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for 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.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Goodyear Tire and Rubber Company** located in **Auglaize** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>
P017 (Mod)	Banbury mixer system with baghouse (banbury no. 1)	with baghouse (banbury no. 1)
P006 (Mod)	This modification is to allow for the installation of a larger mixing chamber, thereby increasing maximum capacity.	This modification is to allow for the installation of a larger mixing chamber, thereby increasing maximum capacity. BAT is established through use of the baghouse, use of non-photochemically reactive materials, compliance with Ohio EPA "Air Toxics Policy", and compliance with the terms and conditions of this permit

Banbury mixer system

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
BAT is established through use of the baghouse, use of non-photochemically reactive materials, compliance with Ohio EPA "Air Toxics Policy", and compliance with the terms			3745-17-07 (A)	Permit Allowable Mass Emissions and/or Control/Usage Requirements
		Applicable Federal & OAC Rules		
		3745-31-05		
			3745-17-11 (B)	0.07 pound PE/hour and 0.32 ton PE/year
			3745-21-07 (G)	1.66 pounds OC/hour and 7.27 tons OC/year
		3745-17-07 (A)		20 percent opacity as a 6-minute average, except as provided by rule.
		3745-17-11 (B)		*
		3745-21-07 (G)		No emission limit established due to use of non-photochemically reactive materials
	3745-31-05		0.07 pound PE/hour and 0.32 ton PE/year	
			1.66 pounds	

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
OC/hour and 7.27 tons OC/year				
20 percent opacity as a 6-minute average, except as provided by rule.				
				*
No emission limit established due to use of non-photocemically reactive materials				

* The emission limit based on this rule is less stringent than the limit established pursuant to OAC rule

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3745-31-05.

SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	14.54*
Particulate Emission (PE)	0.64*

* These emissions units were "existing sources" and, prior to this PTI, there were no applicable limits established in accordance with the SIP for either PE or OC. For purposes of this modification, the existing permit allowable emission limits (based on potential PE and OC emission rates) has been calculated for each emissions unit as 26.59 tons PE per year and 5.91 tons OC per year. This PTI establishes a significant reduction in total potential PE of 52.54 tons per year and a net increase of total potential OC of 2.72 tons per year.

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.**

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WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

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

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to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

Introduction

The purpose of this permit to install is to allow the company to modify emission units P006 and P017 (banbury mixers no. 3 and no. 1, respectively). This modification allows the applicant to install larger mixing chambers on each existing banbury mixer.

A. Applicable Emission Limitations and/or Control Requirements

1. The "Air Emissions Summary" contains all of the applicable emissions limitations for emissions units P006 and P017. No additional emissions limitations and/or control requirements are established in this permit.

B. Operational Restrictions

1. This permit allows the use of materials specified by the permittee in the application for PTI No. 03-0885. There are no significant (greater than one ton per year) emissions of any compound with a threshold limit value (TLV), therefore, modeling for Ohio EPA's "Air Toxics Policy" is not required. Any of the following changes may be deemed a "modification" to the emissions units and, as such, prior notification to and approval from the Ohio EPA, Northwest District Office is required, including the possible issuance of modifications to PTI 03-0885 and the operating permit:
 - a. any changes in the composition of the materials, or the use of new materials, that would result in emissions of a compound with a TLV, as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)" at a rate greater than 1 ton per year;
 - b. any change to the emissions units or its method of operation that would either require an increase in

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the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC 3745-31-01; and,

- c. any change in the composition of the materials, or use of new materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01].
2. The permittee shall not employ materials that would be classified as "photochemically reactive materials", as defined by OAC rule 3745-21-01, in emissions units P006 and P017.
3. The pressure drop across the baghouse shall be maintained within the range of 5.0 to 9.0 inches of water while emissions units P006 and P017 are in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while emissions units P006 and P017 are in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacture's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. 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

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which have been or will be taken, shall be submitted to the Ohio EPA, Northwest District Office. 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. The compliance status of the emissions units shall be reported pursuant to the annual certification required by OAC rule 3745-77-07(C) (5).
4. The actual annual emissions data for the emissions units shall be reported pursuant to the fee emissions report required by OAC rule 3745-78-02(A).

E. Testing Requirements and Compliance Method Determinations

1. Testing Requirement

None.

2. Compliance Method Determinations

Compliance with the emission limitations in the "Air Emissions Summary" above, shall be determined in accordance with the following methods:

- a. Emissions Unit P006: Banbury Mixer No. 3

- i. Emission Limitation

0.07 pound PE per hour and 0.32 ton PE per
year

- Applicable Compliance Method

Compliance with the PE limits shall be determined using an emission factor of 0.0009 pound of PE per pound of rubber, as provided by the Rubber Manufacturing Association, in the following equation:

(0.0009 pound PE/pound rubber) (raw material

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usage rate [either hourly or annually])
(1-control efficiency).

If required by Ohio EPA, compliance shall be determined in accordance with the test methods and procedures in OAC rule 3745-17-03(B) (10).

ii. Emission Limitation

1.66 pounds OC per hour and 7.27 tons OC per year

Applicable Compliance Method

The short term and annual emission limits are based on the emission units potential to emit. Therefore, no daily recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits.

iii. Emission Limitation

20 percent opacity, as a six-minute average

Applicable Compliance Method

Compliance with the visible emission limitations shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B) (1).

b. Emissions Unit P017: Banbury Mixer No. 1

i. Emission Limitation

0.07 pound PE per hour and 0.32 ton PE per year

Applicable Compliance Method

Compliance with the PE limits shall be determined using an emission factor of 0.0009

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pound of PE per pound of rubber, as provided by the Rubber Manufacturing Association, in the following equation:

(0.0009 pound PE/pound rubber) (raw material usage rate [either hourly or annually]) (1-control efficiency).

If required by Ohio EPA, compliance shall be determined in accordance with the test methods and procedures in OAC rule 3745-17-03(B)(10).

ii. Emission Limitation

1.66 pounds OC per hour and 7.27 tons OC per year

Applicable Compliance Method

The short term and annual emission limits are based on the emission units potential to emit. Therefore, no daily recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits.

iii. Emission Limitation

20 percent opacity, as a six-minute average

Applicable Compliance Method

Compliance with the visible emission limitations shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

1. None.