



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

### Air Quality - Part 70 Operating Permit Amendment

**Facility Name:** The Goodyear Tire & Rubber Company  
**Facility Address:** One Wingfoot Way  
Social Circle, Georgia 30025 (Walton County)  
**Mailing Address:** P.O. Box 1227  
Social Circle, Georgia 30025  
**Parent/Holding Company:** The Goodyear Tire & Rubber Company  
**Facility AIRS Number:** 04-13- 297-00036

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued an amendment to the Part 70 Operating Permit for:

#### Authorization to switch from solvent-based to water-based cement

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Amendment and Permit No. **3011-297-0036-V-08-0**. Unless modified or revoked, this Amendment expires simultaneously with Permit No. **3011-297-0036-V-08-0**. This Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in App No. **43846** dated **July 14, 2017**; any other applications upon which this Amendment or Permit No. **3011-297-0036-V-08-2** are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 4 pages.



DRAFT

Richard E. Dunn, Director  
Environmental Protection Division

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**PART 1.0 FACILITY DESCRIPTION****1.3 Process Description of Modification**

The facility is switching from solvent-based to water-based cement. A substantial fraction of the facility's VOC emission rate is due to solvent-based cement, resulting in the use of thermal oxidizer (TO) or regenerative thermal oxidizer (RTO) to mitigate VOC emission. The VOC emission rate from water-based cement, is in contrast, very small and does not need TO or RTO to mitigate VOC emission. While a water-based cement is clearly a better environmental alternative with respect to VOC emissions, product quality and safety are the facility's predominant concerns with respect to the long-term success of the water-based cement application. The facility anticipates a long-term phase-out of the existing solvent-based cementing operation and requires flexibility to operate using either the water-based or the solvent-based cements.

The facility plans to begin the conversion to the water-based cement application process after a trial of the cement in 2017. The facility will route emissions from the use of the water-based cement through the TO or the RTO until each cementer has been converted to water-based cementing.

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**Overall Facility Process Description****CEMENTING**

After the buffing lines, cement is applied to the backs of the tread via rollers. There are two cementers for the flat tread operations (Emission Unit ID Nos. CL01 and CL02) and one cementer with two application roller stations for the ring tread operations (Emission Unit ID No. CL03). After applying the adhesive cement, the flat treads are conveyed through a drying area (Emission Unit ID Nos. CD01 and CD02). A thin polyethylene film is applied to the back of both flat and ring treads prior to packaging. The tire tread rubber is then packaged and shipped.

Emissions from cementing are VOC, which are controlled by thermal oxidizers (Air Pollution Control Device ID Nos. TO01 and RTO2) when solvent-based cement is used. VOC emissions when running water-based cement are uncontrolled.

## Title V Permit Amendment

The Goodyear Tire & Rubber Company

Permit No.: 3011-297-0036-V-08-2

### PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

#### 3.1.2 Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID Nos.	Description
CL01	Flat Tread Cementer No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt) 40 CFR 63, Subpart A 40 CFR 63 Subpart XXXX	3.3.1, 3.3.2 - 3.3.5, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.5.2, 5.2.1, 6.1.7b.i-iii, 6.1.7c.i-ii, 6.1.7d.i, and 6.2.5-6.2.12	TO01 or RTO2**	Thermal Oxidizer No. 1 or Regenerative Thermal Oxidizer No. 2
CL02	Flat Tread Cementer No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt) 40 CFR 63, Subpart A 40 CFR 63 Subpart XXXX	3.3.1, 3.3.2 - 3.3.5, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.5.2, 5.2.1, 6.1.7b.i-iii, 6.1.7c.i-ii, 6.1.7d.i, and 6.2.5-6.2.12	TO01 or RTO2**	Thermal Oxidizer No. 1 or Regenerative Thermal Oxidizer No. 2
CL03	Ring Tread Cementer No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt) 40 CFR 52.21 – PSD 40 CFR 63, Subpart A 40 CFR 63 Subpart XXXX	3.3.1, 3.3.2 - 3.3.5, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.5.2, 5.2.1, 6.1.7b.i-iii, 6.1.7c.i, 6.1.7d.i, 6.2.4, and 6.2.5-6.2.12	RTO2**	Regenerative Thermal Oxidizer No. 2

\* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

\*\* T001 and RT02 are only required to be operated on the Flat Tread Cementer Nos. 1 and 2 and Ring Tread Cementer No. 1 when solvent-based cement is used.

### 3.4 Equipment SIP Rule Standards

[Modified Condition]

3.4.3 The Permittee shall operate and maintain the following Air Pollution Control Devices (APCD) at or above the specified VOC destruction efficiencies during all periods of operation of the emission unit(s) specified when using solvent-based cement.

[391-3-1-.02(2)(tt)(1)]

- 97.0 percent for Thermal Oxidizer No. 1 (APCD ID No. TO01) or 97.0 percent from Regenerative Thermal Oxidizer No. 2 (APCD ID No. RTO2), during all periods of operation when using solvent-based cement on Flat Tread Cementer Nos. 1 and 2 (Emission Unit ID Nos. CL01 and CL02) and Flat Tread Cementer Dryer Nos. 1 and 2 (Emission Unit ID Nos. CD01 and CD02).
- 97.0 percent for Regenerative Thermal Oxidizer No. 2 (APCD ID No. RTO2) during all periods of operation when using solvent-based cement on Ring Tread Cementer No. 1 (Emission Unit ID No. CL03).

[Modified Condition]

3.4.4 The Permittee shall ensure that the waste gases from the specified emission units are sent through the appropriate capture system and controlled by the specified Air Pollution Control Devices (APCD) during all periods of operation of the specified emission units when using solvent-based cement.

[391-3-1-.02(2)(tt)(1)]

- a. Waste gases from solvent-based cement on Flat Tread Cementer Nos. 1 and 2 (Emission Unit ID Nos. CL01 and CL02) and Flat Tread Cementer Dryer Nos. 1 and 2 (Emission Unit ID Nos. CD01 and CD02) are routed to Thermal Oxidizer No. 1 (APCD ID No. TO01) or Regenerative Thermal Oxidizer No. 2 (APCD ID No. RTO2).
- b. Waste gases from solvent-based cement on Ring Tread Cementer No. 1 (Emission Unit ID No. CL03) are routed to Regenerative Thermal Oxidizer No. 2 (APCD ID No. RTO2).

## **PART 4.0 REQUIREMENTS FOR TESTING**

### **4.1 General Testing Requirements**

[Modified Condition]

4.1.4 The Permittee shall submit performance test results to the US EPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with any applicable NSPS or NESHAP standards (40 CFR 60 or 40 CFR 63) that contain Electronic Data Reporting Requirements. This Condition is only applicable if required by an applicable standard and for the pollutant(s) subject to said standard.

[391-3-1-.02(8)(a) and 391-3-1-.02(9)(a)]

## **PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)**

### **5.2 Specific Monitoring Requirements**

[Modified Condition]

5.2.1 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated parameters on the following equipment. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. The combustion zone temperature for Thermal Oxidizer No. 1 and Regenerative Thermal Oxidizer No. 2 (APCD ID Nos. TO01 and RTO2) at a location before any significant temperature drop occurs during all periods of operation of any emission unit that is controlled by APCD ID Nos. TO01 and/or RTO2 when utilizing solvent-based cement. The average temperature shall be calculated using all data points collected but not less than four data points equally spaced over each hour. The temperature monitoring devices shall have a required accuracy of  $\pm 2\%$  ( $^{\circ}\text{F}$ ).

**PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**

**6.1 General Record Keeping and Reporting Requirements**

- 6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

[a. and b. – No changes]

- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

[Modified Condition]

- i. Any three-hour period during which the average combustion temperature of the Regenerative Thermal Oxidizer (APCD ID No. RTO2), required to be monitored per Condition No. 5.2.1, falls below 1553°F when combusting solvent-based cementing emissions from the Flat Tread Cementers and Dryers (Emissions Unit ID Nos. CL01, CL02, CD01 and CD02) and the Ring Tread Cementer (Emissions Unit ID No. CL03).

[Modified Condition]

- ii. Any three-hour period during which the average combustion temperature of the Thermal Oxidizer No. 1 (APCD ID No. TO01), required to be monitored per Condition No. 5.2.1, falls below 1350 °F when combusting solvent-based cementing emissions from the Flat Tread Cementers (Emission Unit ID Nos. CD01, CD02, CL01, and CL02)

[iii. through x. – No changes]

[d. – No changes]

**6.2 Specific Record Keeping and Reporting Requirements**

[New Condition]

- 6.2.15 The Permittee shall each day record the beginning and the end of any period(s) when solvent-based cement was used in either Flat Tread Cementer No. 1 (Emission Unit ID No. CL01), Flat Tread Cementer No. 2 (Emission Unit ID No. CL02), or Ring Tread Cementer No. 1 (Emission Unit ID No. CL03).

[391-3-1-.02(6)(b)1]