

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date: xx/xx/2018

Region: Fayetteville Regional Office
County: Cumberland
NC Facility ID: 2600050
Inspector's Name: Gregory Reeves
Date of Last Inspection: 03/15/2018
Compliance Code: 3 / Compliance - inspection

Facility Data	Permit Applicability (this application only)
<p>Applicant (Facility's Name): The Goodyear Tire & Rubber Company</p> <p>Facility Address: The Goodyear Tire & Rubber Company 6650 Ramsey Street Fayetteville, NC 28311</p> <p>SIC: 3011 / Tires And Inner Tubes NAICS: 326211 / Tire Manufacturing (except Retreading)</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p>SIP: 02Q .0501(c)(2), 2Q .0504 (Part II), 2Q .0307, 2Q .0521 and 2Q .0522</p> <p>NSPS: NA NESHAP: NA PSD: NA PSD Avoidance: NA NC Toxics: NA 112(r): NA Other: NA</p>

Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 2600050.18A Date Received: 04/13/2018 Application Type: Modification Application Schedule: TV-Sign-501(c)(2) Part II Existing Permit Data Existing Permit Number: 00011/T51 Existing Permit Issue Date: 10/31/2017 Existing Permit Expiration Date: 02/28/2020</p>
Christopher Sager Environmental Manager (910) 630-5678 6650 Ramsey Street Fayetteville, NC 28311	Louis Lapierre Manufacturing Director (910) 630-5211 6650 Ramsey Street Fayetteville, NC 28311	Christopher Sager Environmental Manager (910) 630-5678 6650 Ramsey Street Fayetteville, NC 28311	

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2016	0.2700	45.42	158.25	38.12	74.05	31.22	10.93 [MIBK (methyl isobutyl ketone)]
2015	0.2800	47.05	156.66	39.47	75.96	31.38	10.96 [MIBK (methyl isobutyl ketone)]
2014	0.2900	46.47	171.32	38.97	81.19	32.40	11.26 [MIBK (methyl isobutyl ketone)]
2013	0.2700	43.07	155.51	36.10	81.10	31.26	10.80 [MIBK (methyl isobutyl ketone)]
2012	0.2600	41.38	151.30	34.70	76.82	29.81	10.34 [MIBK (methyl isobutyl ketone)]

<p>Review Engineer: Gautam Patnaik</p> <p>Review Engineer's Signature: _____ Date: xx/xx/2018</p>	<p>Comments / Recommendations:</p> <p>Issue: 00011/T52 Permit Issue Date: xx/xx/2018 Permit Expiration Date: February 28, 2020</p>
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I. Facility Description

The Goodyear Tire & Rubber Company operates a rubber tire manufacturing plant in Fayetteville, Cumberland County, North Carolina. The facility primarily produces passenger tires and radial light truck tires.

II. Purpose of Applications

This application is a 2Q .0504 (Part II) application. The current permit lists several sources that were permitted during a Significant modification of the Title V Permit for application (Application # 2600050.16A). These sources are currently not covered by the permit shield described in General Condition R and are required to file a Title V Air Quality Permit Application pursuant to 15A NCAC 2Q .0504 for these sources on or before 12 months after commencing operation.

The above requirement is also stipulated in Section “2.5 - Filing a Title V application and Notification Requirement.”

This application satisfies the above requirements.

III. Regulatory Review

The permitted sources from application # 2600050.16A are listed below:

- One cold feed quad extruder (QE01);
- one 60-inch mill (QE02); And
- one bead winder with a small cold feed extruder (QE01).

2Q .0504 requires the applicant to file an application under Section .0300 of this Subchapter of which 2Q .0307 requires “public participation procedures” and allows for “public and EPA comments.” The “public participation” and review by “EPA and affected states” as per the requirements of 02Q .0521 and 02Q .0522, as mentioned above also satisfy the requirements of 2Q .0504 and 2Q .0307. Thus, this application will be subject to the public and EPA review as per procedures outlined above and the above sources will be shielded.

The current permit contains a source listed in the footnote of the source table “** This emission source (ID No. FWS1) is listed as a 15A NCAC 02Q .0501(c)(2) modification. The Permittee shall file a Title V Air Quality Permit Application on or before 12 months after commencing operation in accordance with General Condition NN.1. The permit shield described in General Condition R does not apply and compliance certification as described in General Condition P is not required.” This source is described as “Solvent and Cement Use (FWS1).”

This foot note will be removed since this application will be subject to “public participation” and review by EPA, thus, effectively shielding this source.

Section 2.6 of the current permit also lists several sources that were to be removed by application # 2600050.16A. These sources were allowed to operate until October 31, 2017.

These sources are listed below:

- #2 Tread Extruder and Mills (cold feed Quad Extruder line) (ID No. TL02);
- #3 4-roll Gum Calendar and Mill Line (ID No. CAL3); and
- (ID No. IES-4) –two of the eight bead tuber units (#2 bead extruder and #7 bead extruder).

Section 2.6 is removed from the modified permit.

Please note that the applicant has not yet taken credit for the reduction of emissions by the removal of these sources.

- 15A NCAC 02D .0958: “Work Practices for Sources of Volatile Organic Compounds”

Currently the facility is subject to the above regulation. However, this regulation now only applies to a few Counties under the Mooresville Regional Office jurisdiction. This facility is located in Cumberland County and therefore not subject to this rule.

IV. Public Notice / EPA and Affected State Review

Pursuant to 2Q. 0521, a notice of the draft Title V Permit was placed on the DAQ website. The notice did provide for a 30-day comment period, with an opportunity for a public hearing and a 45 day EPA review. Copies of the public notice were sent to persons on the Title V mailing list, the Fayetteville Regional Office and EPA. Pursuant to 2Q .0522, a copy of each permit application, each proposed permit and each final permit was provided to EPA.

V. Compliance, Comments, and Recommendations

The inspection done by the Regional Office on 3/15/2018 found the facility to be in compliance.

A Notice of Deficiency has been issued for the late startup notification for source QE03.

The Regional Office recommends removal of the regulation 15A NCAC 02D .0958, which has been done in this modification of the permit.

Also, recommends correction of a typographical error in Section 2.1 D. e. ii., of the permit.

Section 2.1 D. e. ii., of the permit reads:

“If using water-based spray greater containing 1.0 percent VOC by weight or more...”

Is replaced with:

“If using water-based spray containing greater than 1.0 percent VOC by weight or more.”

A professional engineer’s seal and a consistency determination was not required for this modification to the permit.

The Fayetteville Regional Office and the applicant were provided a draft of this permit for their comments and their comments were taken into account.

On 5/17/2018 the Regional Office stated “FRO has no additional comments.”

The applicant in an e-mail on 5/17/2018 mentioned “New Manufacturing Director is Lane Gee, effective May 16, 2018.” As per discussion with the applicant on 5/29/2018 they were in the process of preparing the administrative amendment for the update of the Responsible Official for the facility. But, wanted to proceed with the notices for this application.

Also requested “in addition, the source that we are seeking to remove from the paragraph in Condition 2.1.C.2.a (Page 32 of the draft permit) is BB02-L-12. This corresponded to an old source ID for Banbury 2, which is now covered under Source ID BB02-L9-1 in the current permit.” The reference to source ID No. BB02-L-12, has been removed from 2.1.C. 2.a., of the modified permit. No further action is required in the Title V Equipment Editor (TVEE) for ID No. BB02-L-12.

VI. Permit Modification/Changes

Summary of Changes Made to the Permit (ID No. 00011T52)

Page Number	Condition Number	Change
14	Source Table	Permit 00011T51 - Removed footnote for source (FWS1) for 2Q .0501(c)(2) modification
34	2.1 D. e. ii.,	Corrected typographical error.
	2.2 A. 1., for Permit 00011T51	Removed 15A NCAC 02D .0958.
47 through 55	General Conditions	Updated