

Statement of Basis For Title V Permit

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| Company Name | The Goodyear Tire & Rubber Company | | |
| Premise Number | 16-77-01-0193 | | |
| What makes this facility a Title V facility? | NO _x , SO ₂ , HCl, PM, VOC | | |
| Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)? | Yes | | |
| Were there any “common control” issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them. | No | | |
| Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1) | N/A | | |
| Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3) | N/A | | |
| Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D) | N/A | | |
| Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E) | P006 - PTI 16-02303 (modification, change in method of operation) P007 - PTI 16-02303 (modification, change in method of operation) P010 - PTI 16-02303 (modification, change in method of operation) P070 - PTI 16-02378 (modification, installation of some new equipment) | | |

| Part II (State and Federally Enforceable Requirements) | | | |
|---|-----------------|-------|----------|
| Term and Condition (paragraph) | Basis | | Comments |
| | SIP (3745-) | Other | |
| | | | |

| | | | |
|---------|-------------------|--------------------------------|---|
| 1 | 3745-77-07(A)(13) | | Listing of insignificant emissions units |
| 2 | 3745-14 | | Nitrogen Oxides (NOx) Budget Trading Program |
| 3 - 31 | | 40 CFR Part 63, Subpart DDDD D | National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters |
| 32 - 69 | | 40 CFR Part 63, Subpart XXXX | National Emission Standards for Hazardous Air Pollutants (NESHAP) for Rubber Tire Manufacturing |

C **Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. Whether the basis for the term and condition is the “SIP” or “Other,” an explanation of each term and condition in Part II must be provided in the “Comments” section.

C If there were any “common control” issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

Part III (Requirements Within the State & Federally Enforceable Section)

| EU(s) | Limitation | Basis | | N D | OR | M | S t | E N F | R | St | R p | S t | E T | Mis c | Comments |
|----------------------|--|-----------------|---------------------------------|--------|----|---|--------|-------------|---|----|--------|--------|--------|----------|--|
| | | SIP (3745-) | Other | | | | | | | | | | | | |
| B101 B102 B103 | 20% opacity as a 6-minute average | 17-07 | | N | N | Y | N | N | Y | N | Y | N | N | N | ET - No emission testing for opacity is needed since the facility operates an existing continuous opacity monitoring system. |
| B101 B102 B103 | 0.10 lb of particulate per million Btu actual heat input | 17-10 | | N | N | Y | N | N | Y | N | Y | N | Y | N | |
| B101 B102 B103 | n/a | 18-83 | | N | N | Y | N | N | Y | N | Y | N | Y | N | The sulfur dioxide emission limitation established in accordance with OAC rule 3745-18-83 is less stringent than the sulfur dioxide limitation established in accordance with 40 CFR 52.1881(b)(28)(ix)(E)(1). |
| B101 B102 B103 | | | 40 CFR 52.1881(b)(28)(ix)(E)(1) | N | Y | Y | N | N | Y | N | Y | N | Y | N | OR - The quality of coal burned in this emissions unit shall have a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 4.64 pounds of sulfur dioxide per million Btu actual heat input. |
| P070 | n/a | 21-09(X) | | N | N | N | N | N | N | N | N | N | N | N | Exempt - This emissions unit is exempt because the operation produces specialty tires for antique or other vehicles on an irregular basis or with short production runs. The exemption applies only to tires produced on equipment separate from normal production lines for passenger-type tires. |
| F104 | 20% as a 3-minute average | 17-07 | | N | N | N | N | N | N | N | N | N | N | N | Compliance with the visible emission limitations in OAC rule 3745-17-07 may be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(3), modified so the data reduction and average opacity calculation is based upon sets of twelve consecutive visible emission observations recorded at fifteen-second intervals. |
| F104 | RACM | 17-08 | | N | N | N | N | N | N | N | N | N | N | N | For the purposes of determining compliance with the requirements of OAC rule 3745-17-08, a control measure shall be considered adequate if it complies with the following: a. the visible particulate emission limitation(s) contained in OAC rule 3745-17-08; and b. if applicable, the control measures contained in OAC rule 3745-17-08(B)(3). |

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|----------------------|---|--|----------------|---|---|---|---|---|---|---|---|---|---|---|---|
| P006 P007 P010 | 2.42 lbs/hr organic compounds (OC) 10.60 tpy OC | | 3745- 31-05 | N | N | N | N | N | Y | N | Y | N | N | N | ET - None - AP-42 emission factors and record keeping requirements used as compliance determination. |
| P006 P007 P010 | 0.01 lbs/hr particulate emissions (PM) 0.04 tpy PM | | 3745- 31-05 | N | Y | Y | N | N | Y | N | Y | N | N | N | M -Baghouse operational parameter monitoring (pressure drop) provides indication of ongoing effective PM control, and therefore indication of ongoing compliance with the opacity limit. Daily was chosen as a reasonable and practical monitoring frequency. COMS not economically justified. ET - None - per Ohio EPA Engineering Guide 16 |
| P006 P007 P010 | 10% opacity as a 6-minute average | | 3745- 31-05 | N | Y | Y | N | N | Y | N | Y | N | N | N | M -Baghouse operational parameter monitoring (pressure drop) provides indication of ongoing effective PM control, and therefore indication of ongoing compliance with the opacity limit. Daily was chosen as a reasonable and practical monitoring frequency. COMS not economically justified. ET - None normally required for opacity alone. |
| P070 | Volatile organic compounds (VOC) shall not exceed 420.8 pounds per day and 76.8 tons per year (tpy). | | 3745- 31-05 | N | N | N | N | N | Y | N | Y | N | N | N | ET - None - AP-42 emission factors and record keeping requirements used as compliance determination. |

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

C Instructions for Part III:

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

- C If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section.

To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For the “M”, “R”, “Rp” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no comments. Also, if a “Y” is noted under “OR” or “Misc,” an explanation of the requirements should be provided in the “Comments” section. In addition to a general explanation of the “OR” and/or “Misc,” the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If superseding language is included in the “Miscellaneous Requirements” section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

An explanation is not required if an “N” is noted in the “OR” column or in the “Misc” column.

- C Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.

- **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the “N/A” in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the “Comments” area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain “N/A” when developing the SOB during the initial permit development. Note: APA’s and Off-permit changes do not need to be noted in the SOB.