STATEMENT OF BASIS

BF Goodrich Tire Manufacturing Tuscaloosa, Alabama Tuscaloosa County 413-0024

This proposed Title V Major Source Operating Permit (MSOP) renewal is issued under the provisions of ADEM Admin. Code r. 335-3-16. The above named applicant has requested authorization to perform the work or operate the facility shown on the application and drawings, plans, and other documents attached hereto or on file with the Air Division of Alabama Department of Environmental Management, in accordance with the terms and conditions of this permit.

BF Goodrich Tire Manufacturing was issued its MSOP on October 13, 2015, with an effective date of September 1, 2015, and an expiration date of August 31, 2020. Per ADEM Admin. Code r. 335-3-16-.12(2), an application for permit renewal shall be submitted at least six (6) months, but not more that eighteen (18) months, before the date of expiration of the permit. The initial renewal application was received on February 28, 2020.

Facility Description

BF Goodrich is a tire manufacturing facility in Tuscaloosa, Tuscaloosa County, Alabama. The following are significant sources of air pollutants at this facility:

- Rubber Mixing Operation w/ Dust Collectors
 - Mixing Lines No. 1, No. 2, No. 7, No. 8, and No. 9
 - Filler (Carbon Black) Transfer System
 - Banbury Mixers
 - Associated Mills
- Rubber Preparation
 - Warm-up Mills
 - Calendars
 - Extruders
- Tread Cementing
 - Tread Lines 1, 2, and 3
- Tire Building
 - First and Second Stage Tire Building and Before Cure Repair
- Curing
 - Green Tire Sprayers 1-5
- Finishing
 - After Cure Repair Solvent Usage
- Boilers
 - Boiler No. 1
 - Boiler No. 3 and No. 4

- Emergency Generators
 - Fire Pump A Engine
 - Fire Pump B Engine
 - 80 KW Boiler House Generator
 - 25 KW Natural Gas Fired Emergency Generator

The following is a summary of facility-wide controlled emissions and the reported 2018 actual emissions:

Pollutant	Potential Emissions (TPY)	2018 Actual Emissions (TPY)
PM _{total}	52.78	19.79
PM _{filterable}	46.98	-
PM_{10}	45.41	15.55
PM _{2.5}	29.73	8.81
PM _{con}	5.40	1.10
SO_2	0.75	0.10
NO _x	95.98	18.82
СО	81.56	15.79
VOC	191.82	97.98
Total HAP	24.29	10.99
GHG (CO ₂ e)	114,724.80	-

Renewal Notes

- 1. The facility is removing fuel oil as a fuel source at the facility for the facility boilers. In making this change, the anti-PSD limit associated with the fuel oil would be removed. A requirement to burn only natural gas will be included in the permit in place of the fuel oil requirements.
- 2. The facility has a VOC limit for Silane rubber usage. All other pollutants are under 250 TPY. SO2, NOx, CO and PM PTE were significantly reduced with the removal of fuel oil as a fuel source. The facility would like to take a 245 TPY limit for VOC to avoid NSR major source status.
- 3. The Plant is currently classified as a major source of criteria pollutant emissions and a major source of hazardous air pollutant emissions. The facility is requesting a 24.5 TPY limit for total HAPs and a 9.5 TPY limit for any individual HAP which will reclassify them as an Area Source, and they will no longer be subject to MACT Subpart XXXX or MACT Subpart DDDDD requirements.
- 4. The facility requested to classify the C-modules and the hand grinding operations in the Finishing EU006 permit as insignificant and rename the process After Cure Repair Solvent Usage.
- 5. The facility requested to remove the lb/hr rate for mixing line No. 9. The facility articulated that since the baghouses were determined to be inherent to the process the PTE is not determined after and would be below the PSD threshold. **This limit will remain in the permit.**

- 6. The facility requested the VOC TPY limit (which is an Anti-PSD limit) be removed from the tread end cementing operation and the recordkeeping and reporting requirement associated with it also be removed. The facility has taken a facility-wide VOC emission limit of 245 TPY. Recordkeeping and recording requirements for the new limit will be included for this process, per the requirements of Air Permit No. 413-0024-X117 issued November 6, 2020.
- 7. The facility requested to remove water-based cement from the tread end cementing section of the permit. The cement used at the facility has historically been cement with a VOC content greater than 1% by weight, commonly called "solvent-based" in industry. However the 40 CFR Part 60 Subpart BBB refers to this cement formulation as water-based cement containing 1.0 percent VOC (by weight) or more. There was some confusion as to the applicability of the regulations pertaining to water-based cement because of this discrepancy in definition. As such, the applicable regulations pertaining to water-based cement will remain in the permit.
- 8. The facility requested to add Tread Line No. 3 to this Title V. The permit for this new line was issued May 1, 2019.
- 9. The facility requested to rename decomplexing from EU004 to Before Cure Repair.
- 10. The facility removed the fire water loop (diesel) emergency generators and the air compressor (diesel) emergency generator and replaced them with fire pumps A and B. They also installed a 25 KW 4-stroke reciprocating engine emergency power generator in 2017. The facility requested to change the pressure drop ranges of the Mixers. New pressure drop ranges were supplied for baghouses F7, F8, F11 and F12 when they were replaced from the application submitted in August 2018. The pressure range should be changed to 0.1 inches of H₂O to 6 inches of H₂O for the improved bags that were installed.

Mixing Operation

The Mixing operations consist of the following sources: Farrell Mixers No. 1, No. 2, No. 7, No.8, and No. 9, carbon black filler transfer system, Mixing Lines No, 1, No.2, No.7, and No. 9 Mills, and Mixing Lines No. 7 and No. 8 Extruders. Particulate emissions generated from these sources are controlled by dust collectors and filters (F1-3, F6-8, F11-13, F-91-93, F-100, F-200, F-911-913, F921-923).

Carbon black rubber, and other processing additives are mixed together to achieve desired characteristics. The rubber mixing operation consist of Banbury mixers and their associated mills. Airflow associated with the mixing operation is collected in multiple locations along each process line. Most exhaust points are equipped with dust collectors.

Applicability

• These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".

Rule 335-3-16-.03

• These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-4-.01(1), "Visible Emissions".

Rule 335-3-4-.01(1)

• These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-4-.04(1), "Control of Particulate Emissions for Process Industries – General".

Rule 335-3-4-.04(1)

• These sources have enforceable limits in place in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".

Rule 335-3-14-.04 [Anti-PSD]

• These sources have enforceable limits in place in order to prevent them from being subject to the applicable provisions of 40 CFR 63 Subpart, XXXX, "*National Emissions Standards for Hazardous Air Pollutants for Rubber Tire Manufacturing*".

Rule 335-3-16-.05 [Anti-MACT]

Emission Standards

Opacity:

• **Rule 335-3-4-.01(1)(a)** states that no person shall emit to the atmosphere from any source of emissions, particulate matter of an opacity greater than twenty percent (20%) over a six (6) minute period. **Rule 335-3-4-.01(1)(b)** states that during one six minute period in any sixty minute period a person may discharge into the atmosphere from any source of emissions, particulate of an opacity not greater than that designated as forty percent (40%) opacity. This operation would be subject to this regulation.

Rule 335-3-4-.01

Particulate Matter:

• The particulate emission rate from these sources shall not exceed the allowable set by the equations in Rule 335-3-4-.04:

$$E = 3.59P^{0.62} \left(P < 30 \frac{tons}{hr} \right)$$

or

$$E = 17.31P^{0.16} \left(P \ge 30 \frac{tons}{hr} \right)$$

Where: E=Emissions in lb/hr P=Process weight in tons/hour.

Rule 335-3-4-.04(1) & Rule 335-3-14-.04 [Anti-PSD]

• <u>The particulate emission rate from the Mixing Line No. 9 shall not exceed the lesser of 3.42 lb/hr of the allowable set by</u> ADEM Admin. Code r. 335-3-4-.04.

Rule 335-3-4-.04(1)

VOC:

• Facility-wide VOC emissions shall not exceed 245 tons during any consecutive twelvemonth period.

Rule 335-3-14-.04 [Anti-PSD]

HAPs:

• Facility-wide Hazardous Air Pollutant (HAP) emissions shall not exceed 9.5 tons of any single HAP and no more than 24.5 tons of any combination of HAPs during any consecutive twelve (12) month period.

Rule 335-3-16-.05(a) [Anti-MACT]

Expected Emissions

• According to the application, potential emissions are based on AP-42, Section 4.12, emission factors and 8,760 hrs/yr.

Source #	Pollutant	Emission Rate	
Source #		lb/hr	TPY
	PM	5.43	23.80
EU001	PM ₁₀	3.93	17.23
	PM _{2.5}	1.21	5.34
	VOC	2.63	11.54
	Total HAP	1.25	5.49
	Lead	1.71E-8	7.48E-6

Compliance and Performance Test Methods and Procedures

• Method 5 or 17 of 40 CFR 60, Appendix A, shall be used in the determination of particulate emissions.

Rule 335-3-1-.05

• Method 9 of 40 CFR 60, Appendix A, shall be used in the determination of opacity.

Rule 335-3-1-.05

• Method 25A of 40 CFR 60, Appendix A, shall be used in the determination of volatile organic compound emissions.

Rule 335-3-1-.05

Periodic Monitoring

- Instantaneous visible emissions checks of each baghouse stack shall be conducted weekly while in operation:
 - If instantaneous visible emissions are greater than 10% at any time, a Method 9 visible emissions observation shall be conducted for a minimum of 12 minutes within 30 minutes of the initial observation.
 - If the average opacity observed during the Method 9 observation exceeds 10%, corrective action shall be initiated within 2 hours to reduce the visible emissions.

Rule 335-3-16-.05

• Properly maintained and operated devices shall be utilized to measure the pressure differential between the inlet and exhaust of each baghouse to determine if the pressure differential is within the manufacturer's recommended operating range. The pressure differential shall be checked on at least a daily basis. Whenever a pressure differential is outside of the manufacturer's recommended range, maintenance inspections and/or corrective action to bring the pressure differential within the manufacturer's recommended range are to be initiated within two hours.

Rule 335-3-16-.05

Recordkeeping and Reporting

• The facility shall maintain a record of all inspections, including visible emissions checks, Method 9 observations, pressure differential readings, any problems noted, and corrective actions. Each record shall be maintained for a period of five years from the date of generation.

Rule 335-3-16-.05

• The facility shall maintain a record of the facility-wide total VOC, individual HAP, and total HAP emissions calculated on a twelve (12) month rolling basis using a method approved by the Department. Records shall be maintained in a form suitable for inspection for a period of at least five (5) years.

Rule 335-3-16-.05

• A semi-annual monitoring report shall be submitted to the Department according to the following schedule:

Reporting Period	Date Due
September 1 st through February	April 29 th
28 th or 29th	
March 1 st through August 31 st	October 30th

- Each semi-annual report monitoring report shall contain the following:
 - (a) A detailed description of every instance in which, visible emissions greater than ten (10%) percent opacity were observed, to include the date, time, cause of the visible emissions excursion, and the corrective action taken.
 - (b) A copy of every ADEM visible emissions observation report generated during the reporting period.
 - (c) A description of every instance in which the observed pressure drop was outside of the manufacturer's recommended operating range), to include time, date, observed pressure drop, cause of the pressure drop excursion, and the corrective action taken.
 - (d) Facility-wide total VOC emissions calculated on a twelve (12) month rolling basis using a method approved by the Department.
 - (e) Facility-wide total HAPs emissions calculated on a twelve (12) month rolling basis using a method approved by the Department.
 - (f) Facility-wide individual HAP emissions calculated on a twelve (12) month rolling basis using a method approved by the Department.
 - (g) A statement certifying that all recordkeeping and reporting requirements were accomplished as required.

Rubber Preparation

The Rubber Preparation operations consist of Warm-up Mills, Calenders, and Extruders. Particulate emissions from the extruder process are trace fugitive emissions. There is no control device for the associated operations.

BF Goodrich Tire Manufacturing – Tuscaloosa Facility

Rubber components used in the first and second stage tire building are prepared using Warm-up Mills, Calenders, and Extruders. Warm-up mills are associated with calenders and extruders where the rubber is required to be warmed before subsequent processing. Extruders process rubber to a desired cross section such as the extrusion of sidewell or apex. Typically, the calendaring process is used to bond layers of rubber and other materials, such as metal when producing metallic tissue.

Applicability

• These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".

Rule 335-3-16-.03

• These sources have enforceable limits in place in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".

Rule 335-3-14-.04 [Anti-PSD]

• These sources_have enforceable limits in place in order to prevent them from being subject to the applicable provisions of 40 CFR 63 Subpart, XXXX, "*National Emissions Standards for Hazardous Air Pollutants for Rubber Tire Manufacturing*".

Rule 335-3-16-.05 [Anti-MACT]

Emission Standards

Opacity:

• There are no unit specific emission standards for these units.

Particulate Matter:

• There are no unit specific emission standards for these units.

VOC:

• Facility-wide VOC emissions shall not exceed 245 tons during any consecutive twelvemonth period.

Rule 335-3-14-.04 [Anti-PSD]

HAPs:

• Facility-wide Hazardous Air Pollutant (HAP) emissions shall not exceed 9.5 tons of any

single HAP and no more than 24.5 tons of any combination of HAPs during any consecutive twelve (12) month period.

Rule 335-3-16-.05(a) [Anti-MACT]

Expected Emissions

• According to the application, potential emissions are based on AP-42 emission factors, Section 4.12, and 8,760 hrs/yr.

Source #	Pollutant	Emission Rate	
Source #		lb/hr	TPY
EU002	PM	3.08E-04	1.35E-03
	PM_{10}	3.08E-04	1.35E-03
	PM _{2.5}	3.08E-04	1.35E-03
	VOC	4.86	21.28
	Total HAP	1.11	4.88

Compliance and Performance Test Methods and Procedures

• Method 25A of 40 CFR 60, Appendix A, shall be used in the determination of volatile organic compound (VOC) emissions.

Rule 335-3-1-.05

Periodic Monitoring

• There are no unit specific emission monitoring requirements for these units.

Recordkeeping and Reporting

• The facility shall maintain a record of the facility-wide total VOC, individual HAP, and total HAP emissions calculated on a twelve (12) month rolling basis using a method approved by the Department. Records shall be maintained in a form suitable for inspection for a period of at least five (5) years.

Rule 335-3-16-.05

• A semi-annual monitoring report shall be submitted to the Department according to the following schedule:

September 1 st through February 28 th or 29th	April 29 th
March 1 st through August 31 st	October 30th

- Each semi-annual report monitoring report shall contain the following:
 - (a) Facility-wide total VOC emissions calculated on a twelve (12) month rolling basis using a method approved by the Department.
 - (b) Facility-wide total HAPs emissions calculated on a twelve (12) month rolling basis using a method approved by the Department.
 - (c) Facility-wide individual HAP emissions calculated on a twelve (12) month rolling basis using a method approved by the Department.
 - (d) A statement certifying that all recordkeeping and reporting requirements were accomplished as required.

Rule 335-3-16-.05

Tread End Cementing and Marking

The Tread End Cementing operation consists of Tread Lines 1, 2, and 3. VOC emissions are generated from these sources. There is no control device associated with this operation.

Each line extrudes tread and tread end cement is applied after the extrusion process. The treads are marked with centerline marking ink.

Applicability

• These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".

Rule 335-3-16-.03

• These sources have enforceable limits in place in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".

Rule 335-3-14-.04 [Anti-PSD]

• The tread end cementing portions of this operation are affected sources at a rubber tire manufacturing plant according to \$60.540(a). Therefore, they are subject to the applicable requirements of 40 CFR 60 Subpart BBB, *"Standards of Performance for the Rubber Tire Manufacturing Industry"*.

40 CFR 60 Subpart BBB, §60.540(a)

• These sources have enforceable limits in place in order to prevent them from being subject to the applicable requirements of 40 CFR 63 Subpart XXXX, "*National Emissions Standards for Hazardous Air Pollutants for Rubber Tire Manufacturing*".

40 CFR, 63 Subpart XXXX

Emission Standards

Opacity:

• There are no unit specific emission standards for these sources.

Particulate Matter:

• There are no unit specific emission standards for these sources.

VOC Emissions

• The VOC emissions from each tread end cementing operation shall not exceed ten (10) grams per tread during each calendar month.

40 CFR 60 Subpart BBB, <u>§</u>60.542(a)(3)

• Facility-wide VOC emissions shall not exceed 245 tons during any consecutive twelvemonth period.

Rule 335-3-14-.04 [Anti-PSD]

HAP:

• Facility-wide Hazardous Air Pollutant (HAP) emissions shall not exceed 9.5 tons of any single HAP and no more than 24.5 tons of any combination of HAPs during and consecutive twelve (12) month period.

Rule 335-3-16-.05(a) [Anti-MACT]

Expected Emissions

• According to the application, potential emissions are based on mass balance, NSPS Subpart BBB limitations and 8,760 hrs/yr of operation.

Source #	Dollutont	Emission Rate	
	Fonutant	lb/hr	TPY
EU003	VOC	15.07	66.0

Compliance and Performance Test Methods and Procedures

• Method 25A of 40 CFR 60, Appendix A, shall be used in the determination of volatile organic compounds (VOC) emissions.

Rule 335-3-1-.05

• If water based cements containing less than 1.0 percent VOC (by weight) are used in the tread end cementing operation, formulation data or the results of Method 24 analyses shall be submitted to the Department annually, provided the formula has not changed during the previous twelve (12) months.

40 CFR §60.543(b)(4)

- If water based cements containing **1.0 percent VOC (by weight) or more** are used in the tread end cementing operation, then the following procedure shall be used to determine compliance with the VOC emission limit per tire:
 - (a) Determine the density and weight fraction of VOC in each cement from its formulation data or by analysis of the cement using Method 24.
 - (b) Calculate the total mass of VOC used at the affected facility for the month (M_o) using the following equation:

$$\boldsymbol{M}_{o} = \sum_{i=1}^{a} \boldsymbol{L}_{c_{(i)}} \times \boldsymbol{D}_{c_{(i)}} \times \boldsymbol{W}_{o_{(i)}}$$

Where:

- a = the different number of cements used during the month
- $L_c =$ volume of cement used during the for a month

 $D_c = density of cement used$

W_o = weight fraction of VOC in a cement

- (c) Determine the total number of tires (T_0) cemented for the month
- (d) Calculate the mass of VOC used per tire cemented for the month (G) using the following equation:

$$G = \frac{M_o}{T_o}$$

(e) Calculate the mass of VOC emitted per tire cemented for the month (N):

$$N = G$$

40 CFR §60.543(d)(1)(2)(3)(i)(ii)(iii)(4)(5)

Periodic Monitoring

• The emissions from these sources shall be monitored through recordkeeping practices.

Recordkeeping and Reporting

- The facility shall maintain a record of VOC content of any cements or sprays used in this process. These records shall be kept in a permanent form suitable for inspection and shall be made available to the permitting authority upon request. Each record shall be maintained for a period of five years from the date of generation.
- The facility shall maintain a record of the facility-wide total VOC, individual HAP, and total HAP emissions calculated on a twelve (12) month rolling basis using a method approved by the Department. Records shall be maintained in a form suitable for inspection for a period of at least five (5) years.

Rule 335-3-16-.05

• A semi-annual Subpart BBB report shall be submitted to the Department according to the following schedule:

Reporting Period	Date Due
September 1 st through February 28 th or 29th	April 29 th
March 1 st through August 31 st	October 30th

- Each semi-annual report monitoring report shall contain the following:
 - (a) Facility name and address;
 - (b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report as outlined in General Proviso No. 9;
 - (c) Date of report and beginning and ending dates of the reporting period;
 - (d) A detailed description of each monthly average VOC emission rate that exceeds the VOC emission limit;
 - (e) If no exceedance occurred during the reporting period, a statement that were no deviations from the emission limitations.

Rule 335-3-16-.05

• A semi-annual monitoring report shall be submitted to the Department according to the following schedule:

Reporting Period	Date Due
September 1 st through February 28 th or 29th	April 29 th
March 1 st through August 31 st	October 30th

- Each semi-annual report monitoring report shall contain the following:
 - (a) Facility-wide total VOC emissions calculated on a twelve (12) month rolling basis using a method approved by the Department.
 - (b) Facility-wide total HAPs emissions calculated on a twelve (12) month rolling basis using a method approved by the Department.
 - (c) Facility-wide individual HAP emissions calculated on a twelve (12) month rolling basis using a method approved by the Department.
 - (d) A statement certifying that all recordkeeping and reporting requirements were accomplished as required.

Rule 335-3-16-.05

Tire Building

This process consists of the first and second stage tire assembly and before cure repair. There is no control device associated with this operation.

Various rubber tire components are prepared and assembled in two stages to produce a green tire. Small quantities of rubber cement of heptane-like solvent may be applied in the second stage. The solvent application is not an NSPS affected operation. Air emissions from the stages of tire building are a result of the cement/solvent use. The decomplexing area for breakdown of out-ofspecification materials has been renamed to Before Cure Repair.

Applicability

• This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".

Rule 335-3-16-.03

• These sources have enforceable limits in place in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".

Rule 335-3-14-.04 [Anti-PSD]

• These sources have enforceable limits in place to prevent them from being subject to the applicable requirements of 40 CFR 63 Subpart XXXX, "National Emissions Standards for Hazardous Air Pollutants for Rubber Tire Manufacturing".

40 CFR 63 Subpart XXXX

Emission Standards

Opacity:

• There are no unit specific emission standards for these sources.

Particulate Matter:

• There are no unit specific emission standards for these sources.

VOC:

• Facility-wide VOC emissions shall not exceed 245 tons during any consecutive twelvemonth period.

Rule 335-3-14-.04 [Anti-PSD]

HAP:

• Facility-wide HAP emission limits of 9.5 tons of any single HAP and no more than 24.5 tons of any combination of HAPs during and consecutive twelve (12) month period.

Rule 335-3-16-.05(a) [Anti-MACT]

Expected Emissions

• According to the application, potential emissions are based mass balance, and 8,760 hrs/yr of operation.

Source #	Dollutont	Emission Rate	
Source #	Ponutant	lb/hr TPY	TPY
EU004	VOC	0.40	1.75

Compliance and Performance Test Methods and Procedures

• Method 25A of 40 CFR 60, Appendix A, shall be used in the determination of volatile organic compounds (VOC) emissions.

Rule 335-3-1-.05

• Method 311 of 40 CFR 63, Appendix A, or supplier formulation data, shall be used in the determination of HAP content in any cement of solvent used in this process.

Rule 335-3-1-.05

Periodic Monitoring

• The emissions from these sources shall be monitored through recordkeeping practices.

Recordkeeping and Reporting

• The facility shall maintain a record of the facility-wide total VOC, individual HAP, and total HAP emissions calculated on a twelve (12) month rolling basis using a method approved by the Department. Records shall be maintained in a form suitable for inspection for a period of at least five (5) years.

Rule 335-3-16-.05

• A semi-annual monitoring report shall be submitted to the Department according to the following schedule:

Reporting Period	Date Due
September 1 st through February 28 th or 29th	April 29 th
March 1 st through August 31 st	October 30th

- Each semi-annual report monitoring report shall contain the following:
 - (a) Facility-wide total VOC emissions calculated on a twelve (12) month rolling basis using a method approved by the Department.
 - (b) Facility-wide total HAPs emissions calculated on a twelve (12) month rolling basis using a method approved by the Department.
 - (c) Facility-wide individual HAP emissions calculated on a twelve (12) month rolling basis using a method approved by the Department.
 - (d) A statement certifying that all recordkeeping and reporting requirements were accomplished as required.

Rule 335-3-16-.05

Tire Curing

This process consists of Curing Presses and Green Tire Spraying Units 1, 4, 5, 6. Emissions of PM, VOC, and Total HAP are generated from these sources. Emissions from the green tire sprayers are controlled by an internal baffle system at each sprayer.

Uncured (green) tires are cured (vulcanized) in individual curing presses. Prior to being placed in a press, each tire is sprayed with green tire spray which acts as a mold release.

Applicability

• This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".

Rule 335-3-16-.03

• This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-4-.04(1), "Control of Particulate Emissions for Process Industries – General".

Rule 335-3-4-.04(1)

• These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-4-.01(1), "Visible Emissions".

Rule 335-3-4-.01(1)

• These units have enforceable limits in place in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".

Rule 335-3-14-.04 [Anti-PSD]

• The green tire spraying portions of this operation are affected sources at a rubber tire manufacturing plant according to \$60.540(a). Therefore, they are subject to the applicable requirements of 40 CFR 60 Subpart BBB, *"Standards of Performance for the Rubber Tire Manufacturing Industry"*.

40 CFR 60 Subpart BBB, §60.540(a)

• These units have enforceable limits in place in order to prevent them from being subject to the applicable requirements of 40 CFR 63 Subpart XXXX, "*National Emissions Standards for Hazardous Air Pollutants for Rubber Tire Manufacturing*".

40 CFR, 63 Subpart XXXX

Emission Standards

Opacity:

• **Rule 335-3-4-.01(1)(a)** states that no person shall emit to the atmosphere from any source of emissions, particulate matter of an opacity greater than twenty percent (20%) over a six (6) minute period. **Rule 335-3-4-.01(1)(b)** states that during one six minute period in any sixty minute period a person may discharge into the atmosphere from any source of emissions, particulate of an opacity not greater than that designated as forty percent (40%) opacity. This operation would be subject to this regulation.

Rule 335-3-4-.01

Particulate Matter:

• The particulate emissions from these sources shall not exceed the allowable set by ADEM Admin. Code r. 335-3-4-.04.

Rule 335-3-4-.04(1)

VOC:

• The VOC content of the green tire spray shall not exceed 1.0% by weight.

Rule 335-3-14-.04 [Anti-PSD]

• The VOC emissions from the each inside green tire spraying operation where only waterbased sprays are used shall not exceed 1.2 grams (0.0026 lb) of VOC per tire sprayed each month.

40 CFR 60 Subpart BBB, §60.542(a)(5)(i)

• The VOC emissions from the each outside green tire spraying operation where only waterbased sprays are used shall not exceed 9.3 grams (0.021lb) of VOC per tire sprayed each month.

40 CFR 60 Subpart BBB, §60.542(a)(5)(ii)

• Facility-wide VOC emissions shall not exceed 245 tons during any consecutive twelvemonth period.

Rule 335-3-14-.04 [Anti-PSD]

HAP:

• Facility-wide Hazardous Air Pollutant (HAP) emissions shall not exceed 9.5 tons of any single HAP and no more than 24.5 tons of any combination of HAPs during and consecutive twelve (12) month period.

Rule 335-3-16-.05(a) [Anti-MACT]

Expected Emissions

• According to the application, potential emissions are based on AP-42, Section 4.12, emissions factors, Vendor Formulation data, and 8,760 hrs/yr of operation.

Source #	Pollutant	Emission Rate	
		lb/hr	TPY
EU005	PM _{total}	1.99	8.70
	PM_{10}	1.99	8.70
	PM _{2.5}	1.99	8.70
	VOC	16.76	73.43
	HAP	2.75	12.04

Compliance and Performance Test Methods and Procedures

• Method 5 of 40 CFR 60, Appendix A, shall be used in the determination of particulate emissions.

Rule 335-3-1-.05

• Method 9 of 40 CFR 60, Appendix A, shall be used in the determination of opacity.

Rule 335-3-1-.05

• Formulation data or the results of Method 24 analyses for the water-based sprays containing less than 1.0 percent VOC (by weight) shall be submitted to the Department annually, provided that the formula has not changed during the previous twelve (12) months.

40 CFR 60 Subpart BBB, §60.543(b)(4)

• Method 311 of 40 CFR 63, Appendix A or supplier formulation data, shall be used in the determination of HAP content in any cement or solvent used in this process.

Rule 335-3-1-.05

Periodic Monitoring

BF Goodrich Tire Manufacturing – Tuscaloosa Facility

• The emissions from these sources shall be monitored through recordkeeping practices.

Recordkeeping and Reporting

• The facility shall maintain a record of VOC content of any sprays used in this process. Each record shall be maintained for a period of five years from the date of generation.

Rule 335-3-16-.05

• Green tire spray formulation data shall be submitted to the Department withing sixty (60) days of the end of each calendar year provided that the spray formulation has not changed in the previous twelve (12) months. If the spray formulation changes before the end of the annual twelve (12) month reporting period, formulation data or a Method 24 analysis results shall be reported to the Department within thirty (30) days of the change.

40 CFR 60 Subpart BBB, §60.546(j)

• During any month, twelve (12) month period, or other compliance period during which there is an exceedance of the green tire spray VOC emission limit, the Department shall be notified in writing within ten (10) days of determining the exceedance.

Rule 335-3-16-.05

• The facility shall maintain a record of the facility-wide total VOC, individual HAP, and total HAP emissions calculated on a twelve (12) month rolling basis using a method approved by the Department. Records shall be maintained in a form suitable for inspection for a period of at least five (5) years.

Rule 335-3-16-.05

• A semi-annual monitoring report shall be submitted to the Department according to the following schedule:

Reporting Period	Date Due
September 1 st through February 28 th or 29th	April 29 th
March 1 st through August 31 st	October 30th

- Each semi-annual report monitoring report shall contain the following:
 - (a) Facility-wide total VOC emissions calculated on a twelve (12) month rolling basis using a method approved by the Department.
 - (b) Facility-wide total HAPs emissions calculated on a twelve (12) month rolling basis using a method approved by the Department.
 - (c) Facility-wide individual HAP emissions calculated on a twelve (12) month rolling

basis using a method approved by the Department.

(d) A statement certifying that all recordkeeping and reporting requirements were accomplished as required.

Rule 335-3-16-.05

Finishing

This process consisted of nineteen (19) C-Modules, Tire Repair Station, and R1 Repair Buffing. The C-Modules, repair grinding and repair station were determined to be insignificant. The process has been renamed After Cure Repair Solvent Usage. Emissions of PM, VOC, and HAPs are generated from this source.

In After Cure Repair, tires are repaired and undergo uniformity adjustments. In uniformity, a balance mud may be added. The balance mud contains isopropyl alcohol and heptane. Emissions from this unit are from solvent usage, balance mud usage and repair grinding.

Applicability

• This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".

Rule 335-3-16-.03

• This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-4-.01(1), "Visible Emissions".

Rule 335-3-4-.01(1)

• This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-4-.04(1), "Control of Particulate Emissions for Process Industries – General".

Rule 335-3-4-.04(1)

• These units have enforceable limits in place in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".

Rule 335-3-14-.04 [Anti-PSD]

• These units have enforceable limits in place to prevent them from being subject to the applicable requirements of 40 CFR 63 Subpart XXXX, "National Emissions Standards for Hazardous Air Pollutants for Rubber Tire Manufacturing".

40 CFR 63 Subpart XXXX

Emission Standards

Opacity:

• **Rule 335-3-4-.01(1)(a)** states that no person shall emit to the atmosphere from any source of emissions, particulate matter of an opacity greater than twenty percent (20%) over a six (6) minute period. **Rule 335-3-4-.01(1)(b)** states that during one six minute period in any sixty minute period a person may discharge into the atmosphere from any source of emissions, particulate of an opacity not greater than that designated as forty percent (40%) opacity. This operation would be subject to this regulation.

Rule 335-3-4-.01

Particulate Matter:

• The particulate emissions from these sources shall not exceed the allowable set by ADEM Admin. Code r. 335-3-4-.04.

Rule 335-3-4-.04(1)

VOC:

• Facility-wide VOC emissions shall not exceed 245 tons during any consecutive twelvemonth period.

Rule 335-3-14-.04 [Anti-PSD]

Expected Emissions

• According to the application, potential emissions are based on a rate per tire that was determined using 2017, 2018, and 2019 cleaning usage and total tire production and 8,760 hrs/yr of operation.

Source #	Pollutant	Emission Rate	
		lb/hr	TPY
EU0006	VOC	2.81	12.32

Compliance and Performance Test Methods and Procedures

• Method 5 of 40 CFR 60, Appendix A, shall be used in the determination of particulate emissions.

Rule 335-3-1-.05

• Method 9 of 40 CFR 60, Appendix A, shall be used in the determination of opacity.

Rule 335-3-1-.05

Periodic Monitoring

• Visible emission checks shall be conducted weekly while each unit is in operation. If the observed instantaneous opacity is greater than ten (10%) percent at any time, a visible emissions observation shall be conducted within **thirty (30) minutes** of the observation in accordance with 40 CFR 60 Appendix A, Method 9 for a minimum of twelve (12) consecutive minutes. Whenever any visible emissions are observed, maintenance inspections and/or corrective action to reduce the visible emissions are to be initiated within two hours, followed by an additional observation to confirm the visible emissions have ceased.

Recordkeeping and Reporting

• The facility shall maintain a record of the facility-wide total VOC emissions calculated on a twelve (12) month rolling basis using a method approved by the Department. Records shall be maintained in a form suitable for inspection for a period of at least five (5) years.

Rule 335-3-16-.05

• A semi-annual monitoring report shall be submitted to the Department according to the following schedule:

Reporting Period	Date Due
September 1 st through February 28 th or 29th	April 29 th
March 1 st through August 31 st	October 30th

- Each semi-annual report monitoring report shall contain the following:
 - (a) A description of every instance in which corrective action was required to be performed on any unit. This description shall include time, date, observed pressure drop, cause of the increased or decreased pressure drop, and the corrective action taken.
 - (b) A statement certifying that all required monitoring, recordkeeping, and reporting requirements were accomplished as required.

Rule 335-3-16-.05

• A semi-annual monitoring report shall be submitted to the Department according to the following schedule:

Reporting Period	Date Due
September 1 st through February 28 th or 29th	April 29 th
March 1 st through August 31 st	October 30th

- Each semi-annual report monitoring report shall contain the following:
 - (a) Facility-wide VOC emissions calculated on a twelve (12) month rolling basis using a method approved by the Department.
 - (b) A statement certifying that all recordkeeping and reporting requirements were accomplished as required.

Rule 335-3-16-.05

Boilers

There are three boilers located at the facility. Boiler 1 is a 63.4 MM Btu/hr boiler that is currently permitted to burn natural gas and fuel oil. Boilers 3 and 4 are both 80.0 MM Btu/hr boilers that are also currently permitted to burn natural gas and fuel oil. The facility has removed fuel oil from the facility and is requesting the permit to be revised to reflect only natural gas will be burned. The facility has contracted for non-interruptible (firm) natural gas and will not have an alternative fuel supply. Emissions of PM, SO₂, NO_X, CO, and VOC are generated from these sources. The boilers are used for approximately 20% space heat and 80% process heat.

Applicability

• These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".

Rule 335-3-16-.03

• These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-4-.01(1), "Visible Emissions".

Rule 335-3-4-.01(1)

• These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-4-.03(1), "Control of Particulate Emissions in Fuel Burning Equipment" for a Class I County.

<u>Rule 335-3-4-.03(1)</u>

• These sources are subject to the applicable requirements of 40 CFR 63, "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heater".

40 CFR 63 Subpart DDDDD, §63.7485

Emission Standards

Opacity:

• **Rule 335-3-4-.01(1)(a)** states that no person shall emit to the atmosphere from any source of emissions, particulate matter of an opacity greater than twenty percent (20%) over a six (6) minute period. **Rule 335-3-4-.01(1)(b)** states that during one six minute period in any sixty minute period a person may discharge into the atmosphere from any source of emissions, particulate of an opacity not greater than that designated as forty percent (40%) opacity. This operation would be subject to this regulation.

Rule 335-3-4-.01

Particulate Matter:

• The particulate emissions from the boilers shall not exceed that which is calculated using the fuel burning equation in ADEM Admin. Code r. 335-3-4-.03(1).

Rule 335-3-4-.03(1)

Sulfur Dioxide:

• The sulfur dioxide emissions from the boilers shall not exceed 4.0 lbs/MMBtu.

Rule 335-3-5-.01(1)

Natural Gas:

• These units shall combust only natural gas only.

Rule 335-3-4-.03(1)

Expected Emissions

BF Goodrich Tire Manufacturing – Tuscaloosa Facility

Source #	Pollutant	Emission Rate	
		lb/hr	TPY
	PM _{total}	0.47	2.04
	PM ₁₀	0.47	2.04
	PM _{2.5}	0.47	2.04
	CO	5.14	22.52
Doilor 1	NO _x	6.12	26.80
Doner 1	SO_2	0.037	0.16
	VOC	0.34	1.47
	CO_2	7343.63	32165.10
	Ammonia	2.3E-3	0.01
	Total HAP	0.12	0.51
	PM _{total}	0.59	2.57
	PM_{10}	0.59	2.57
	PM _{2.5}	0.59	2.57
	СО	6.49	28.41
Boiler 3	NOx	7.72	33.82
	SO2	0.046	0.2
	VOC	0.42	1.86
	Ammonia	4.6E-3	0.02
	Total HAP	0.15	0.64
	PM _{total}	0.59	2.57
Boiler 4	PM ₁₀	0.59	2.57
	PM _{2.5}	0.59	2.57
	СО	6.49	28.41
	NOx	7.72	33.82
	SO_2	0.046	0.2
	VOC	0.42	1.86
	Ammonia	4.6E-3	0.02
	Total HAP	0.15	0.64

• According to the application, potential emissions are based on AP-42, Section 1.4, emissions factors and 8,760 hrs/yr of operation.

Compliance and Performance Test Methods and Procedures

• Method 5 of 40 CFR 60, Appendix A, shall be used in the determination of particulate emissions.

Rule 335-3-1-.05

• Method 6 of 40 CFR 60, Appendix A, shall be used in the determination of sulfur dioxide (SO₂) emissions.

Rule 335-3-1-.05

• Method 7E of 40 CFR 60, Appendix A, shall be used in the determination of nitrogen oxide (NO_x) emissions.

Rule 335-3-1-.05

• Method 9 of 40 CFR 60, Appendix A, shall be used in the determination of opacity.

Rule 335-3-1-.05

• Method 10 of 40 CFR 60, Appendix A, shall be used in the determination of carbon monoxide (CO) emissions.

Rule 335-3-1-.05

• Method 25A of 40 CFR 60, Appendix A, shall be used in the determination of volatile organic compound (VOC) emissions.

Rule 335-3-1-.05

Periodic Monitoring

• The emissions from these sources shall be monitored through recordkeeping practices.

Recordkeeping and Reporting

• The facility shall maintain a record of all inspections, any problems noted, and corrective actions. Each record shall be maintained for a period of five years from the date of generation.

Rule 335-3-16-.05

Emergency Generators

There are four emergency generators located at the facility. Fire Pump A is a 282 hp ultra low sulfur diesel engine with a maximum engine power of 211 kW. Fire Pump B is a 399 hp ultra low sulfur diesel engine with a maximum engine power of 297.5 kW. The boiler house generator is an 80 KW emergency generator that uses ultra low sulfur diesel. The 25 KW warehouse generator is a natural gas-fired emergency generator. Emissions of PM, SO₂, NO_x, CO, VOC, Total HAP, Formaldehyde and CO₂e are generated from these sources.

Applicability

• This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".

Rule 335-3-16-.03

• These sources are subject to the applicable requirements of 40 CFR 63 Subpart ZZZZ, *"National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE)"*.

40 CFR 63 Subpart ZZZZ

• Fire Pump A and B are subject to the applicable requirements of 40 CFR 60 Subpart IIII, *"Standards of Performance for Stationary Compression Ignition Internal Combustion Engines."*

40 CFR 60 Subpart IIII, §60.4200

• The 25KW emergency generator is subject to the applicable requirements of 40 CFR 60 Subpart JJJJ, "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines"

40 CFR 60 Subpart JJJJ, §60.4230

Emission Standards

• For Fire Pump A and B engines and the 25 kW emergency generator, the permittee must purchase engines certified to meet the applicable emission limits.

40 CFR 60 Subpart IIII and Subpart JJJJ, §60.4214 and §60.4231

• Per 40 CFR 63.6590(c), an affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR 60 Subpart IIII, for compression ignition engines or 40 CFR 60 Subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part. Fire Pump A and B and the 25kW warehouse generator fall under this section.

40 CFR 63 Subpart ZZZZ, §63.6590(c)

Opacity:

• **Rule 335-3-4-.01(1)(a)** states that no person shall emit to the atmosphere from any source of emissions, particulate matter of an opacity greater than twenty percent (20%) over a six (6) minute period. **Rule 335-3-4-.01(1)(b)** states that during one six minute period in any sixty minute period a person may discharge into the atmosphere from any source of emissions, particulate of an opacity not greater than that designated as forty percent (40%) opacity. This operation would be subject to this regulation.

Rule 335-3-4-.01

Particulate Matter:

• Particulate matter (PM emissions from the Fire Pump A and B engines shall not exceed 0.20 g/kW-hr.

40 CFR 60 Subpart IIII, §60.4205(c)

Nitrogen Oxide:

• Nitrogen oxide (NO_X) + nonmethane hydrocarbon (NMHC) emissions from the Fire Pump A and B engines shall not exceed 4.0 g/kW-hr.

40 CFR 60 Subpart IIII, §60.4205(c)

• Nitrogen oxide (NO_X) + hydrocarbon (HC) emissions from the 25 kW Warehouse engine shall not exceed 10 g/HP-hr.

40 CFR 60 Subpart JJJJ, §60.4233(d) Table 1

Carbon Monoxide:

• Carbon Monoxide (CO) emissions from the 25 kW Warehouse engine shall not exceed 387 g/HP-hr

40 CFR 60 Subpart JJJJ, §60.4233(d) Table 1

Diesel Fuel:

• Fire Pump A and B and the 80 kW Boiler House Generator must use diesel fuel that meets the requirements of 40 CFR §80.510(b).

40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ, §60.4207(b) and §63.6604(b)

Expected Emissions

• According to the application, potential emissions are based on AP-42 emissions factors and 500 hrs/yr of operation.

Source #	Pollutant	Emission Rate	
		lb/hr	TPY
	PM _{total}	0.93	0.01
	PM ₁₀	0.85	0.01
	PM _{2.5}	0.85	0.01
	СО	31.16	0.08
	CO ₂	19.46	85.23
Fire Pump A	NO _x	9.09	0.43
	SO_2	17.40	0.08
	VOC	0.62	0.01
	Total HAP	2.59	0.0019
	CO _{2e}	19.52	85.23
	PM _{total}	0.93	0.02
	PM_{10}	0.85	0.02
	PM _{2.5}	0.85	0.02
	СО	31.16	0.16
	CO ₂	25.82	113.10
	NOx	9.09	0.66
	SO_2	17.40	0.11
	VOC	0.62	0.01
	Total HAP	2.59	0.0026
Fire Pump B	CO ₂ e	25.91	113.48
	PM_{10}	0.85	9.66E-4
	PM _{2.5}	0.85	9.66E-4
	CO	31.16	1.29
	CO_2	2.6	11.40
	NOx	9.09	0.03
	SO2	17.40	2.71E-5
	VOC	0.62	0.03
	Total HAP	2.59	0.0034
	CO ₂ e	2.63	11.52
	PM _{total}	0.93	0.004
	PM_{10}	0.85	0.004
	PM _{2.5}	0.85	0.004
80kW	СО	31.16	0.698
Emergency	CO_2	4.71	20.65
Generator	NOx	9.09	0.41
	SO2	17.40	1.10E-4
	VOC	0.62	0.01
	Total HAP	2.59	0.0065
	CO ₂ e	5.07	22.20

Compliance and Performance Test Methods and Procedures

• Method 5 of 40 CFR 60, Appendix A, shall be used in the determination of particulate emissions.

Rule 335-3-1-.05

• Method 7E of 40 CFR 60, Appendix A, shall be used in the determination of nitrogen oxide (NO_X) emissions.

Rule 335-3-1-.05

• Method 9 of 40 CFR 60, Appendix A, shall be used in the determination of opacity.

Rule 335-3-1-.05

• Method 10 of 40 CFR 60, Appendix A, shall be used in the determination of carbon monoxide (CO) emissions.

Rule 335-3-1-.05

Periodic Monitoring

• For the Boiler House Generator, the Permittee shall perform oil and filter changes every 500 hours of operation or annually, whichever comes first; inspection of air cleaner every 1,000 hours of operation or annually, whichever comes first; inspection of all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. The facility can also utilize an oil analysis program that follows the requirements of 40 CFR 63 Subpart ZZZZ, §63.6625(i) or §63.6625(j)

40 CFR Subpart ZZZZ, §63.6625(i)

• If an oil analysis program is utilized for the boiler house engine, the Permittee must perform the oil analysis at the same frequency specified above for changing the oil. The Permittee must at a minimum analyze the following parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new, viscosity of the oil when new, viscosity of the oil when new, viscosity of the oil when new, or percent water content (by volume) is greater than 0.5. If any of the limits are exceed, the Permittee must change the oil within 2 business days of receiving the results of the analysis or before commencing

operation, whichever is later.

40 CFR 63, Subpart ZZZZ, §63.6625(i)

• If an oil analysis program is utilized for the boiler house engine, the Permittee must perform the oil analysis at the same frequency specified above for changing the oil. The Permittee must at a minimum analyze the following parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligram of potassium hydroxide (KOH) per gram from the Total Acid Number of the oil when new, viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new, or percent water content (by volume) is greater than 0.5. If any of the limits are exceed, the Permittee must change the oil within 2 business days of receiving the results of the analysis or before commencing operation, whichever is later.

40 CFR 63, Subpart ZZZZ, §63.6625(j)

• Fire Pump A and Fire Pump B must be certified according to the emission standards in Subpart IIII for the same model year and maximum engine power. Each unit must be installed and configured according to the manufacturer's emission-related specifications.

40 CFR 60, Subpart III, §60.4211

• The Permittee must install a non-resettable hour meter for each unit if one is not already installed.

<u>40 CFR 63 Subpart ZZZZ, §63.6625(f), 40 CFR 60 Subpart IIII and Subpart JJJJ, §60.4237(b) and §60.4209(a)</u>

These units may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal. State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of these units are limited to 100 hours per year. There is no time limit on the use of these units in emergency situations. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. These units may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply nonemergency power as part of a financial arrangement with another entity. Any operation other than emergency operation, maintenance and testing, and operation in nonemergency situations for 50 hours per year, as permitted in 40 CFR 60 Subpart IIII, 40 CFR Subpart JJJJ, and 40 CFR 63 Subpart ZZZZ, is prohibited.

<u>40 CFR 63 Subpart ZZZZ, §63.6640(f), 40 CFR 60 Subpart IIII and Subpart JJJJ,</u> <u>§60.4211(f) and §60.4243(d)</u>

Recordkeeping and Reporting

• The facility shall maintain a record of all inspections, including visible emissions checks, Method 9 observations, pressure differential readings, any problems noted, and corrective actions. Each record shall be maintained for a period of five years from the date of generation.

Rule 335-3-16-.05

• The facility shall maintain a record of the parameters that are analyzed as part of the oil analysis program, the results of the analysis, the oil changes for the engine, and the maintenance conducted on the boiler house emergency generator in order to demonstrate that the unit is operated and maintained. The analysis program must be part of the maintenance plan for the engine.

40 CFR 63 Subpart, §63.6655(e)

• The facility must keep a record of the maintenance conducted on the boiler house emergency generator in order to demonstrate that you operated and maintained the unit and after-treatment control device (if any) according to your own maintenance plan.

40 CFR 63 Subpart ZZZZ, §63.6655(e)

• The facility shall maintain a record of the hours of operation of each engine that is recorded through the non-resettable hour meter and document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the facility must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.

40 CFR 60 Subpart IIII and JJJJ, §60.4214(b) and §60.4245(b)

• If a unit is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §60.4211(f)(2)(ii) and (iii) or that operates for the purposes specified in §60.4211(f)(3)(i), the Permittee must submit an annual report according to the requirements of §60.4214(d)(1) through (3).

40 CFR 60 Subpart IIII, §60.4214(d)

• The following records shall be maintained to demonstrate compliance with the requirements of Subpart JJJJ:

- All notifications submitted to comply with this subpart and all documentation supporting any notification.
- All maintenance conducted on the engine.
- Documentation from the manufacturer that the engine is certified to meet the emission standards.

40 CFR 60 Subpart JJJJ, §60.4245(a)(1), (2), & (3)

Recommendation

Based on the above analysis, I recommend that, pending the 30-day public comment period and the 45-day EPA review period, BF Goodrich Tire Manufacturing be issued a renewal for Major Source Operating Permit No. 413-0024. The facility should be able to meet the requirements of this permit and all applicable state and federal air pollution regulations.

November 17, 2020 Date

Haley K. Crumpton Industrial Minerals Section Energy Branch Air Division