

**Statement of Basis
Michelin North America, Inc.
Midland City, AL
Dale County
604-0009**

This proposed Title V Major Source Operating Permit 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 the Alabama Department of Environmental Management, in accordance with the terms and conditions of this permit.

Michelin North America, Inc. (Michelin) was issued its existing Major Source Operating Permit (MSOP) Permit No. 604-0009, on August 5, 2015, with an expiration date of August 31, 2020. Per ADEM Rule 335-3-16.12(2), an application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of the permit. Based on this rule, the application for renewal was due to be submitted to the Department no later than February 29, 2020, but no earlier than February 28, 2019. An initial application for permit renewal was received by the Department on February 28, 2020. Based on this, the Department considers this to be a timely application. Additional revised calculations and corresponding forms were received by the Department on November 23, 2020. The proposed MSOP will expire on [INSERT DATE].

Based on the Title V Permit application Michelin North America, Inc. is a major source of Volatile Organic Compounds (VOC). This facility currently operates under a Plant-Wide Applicability Limit (PAL) of 457.9 tons of VOC per rolling 12-month period for VOC.

The following sources are significant sources of air pollution for this facility:

- Rubber Preparation (Milling, Cutting, Joining, and Complexing)
 - EU001
- BD1, BD3, BD4, and BD5 Extruding and Associated Milling
 - EU002
- BD2, BD6, BD7, and BD8 Extruding with Undertread Cementing and Boiler Incineration
 - EU003
- 1st and 2nd Stage Tire Assembly with Michelin C Process
 - EU004
- Tire Curing and Finishing Operation
 - EU007
- Dual Fuel Boilers
 - EU009
 - EU010
- Diesel Fired Emergency Fire Pumps 1, 2, & 3

The following table is the facility-wide potential uncontrolled emissions and the 2020 actual emissions:

Facility Wide Potential Uncontrolled Emissions	
Pollutant	Total Emissions (TPY)
CO	35.7
CO ₂	51,005.3
CO ₂ e	51,528.7
NO _x	42.9
SO ₂	0.26
PM	41.7
PM10	27.2
PM2.5	27.1
PM (Filterable)	39.2
PM10 (Filterable)	24.8
PM2.5 (Filterable)	24.6
PM (Condensable)	2.42
Lead	0.0002
Ammonia	0.021
Total VOCs	413.4
Total HAPs	8.98

Facility Wide 2020 Actual Emissions	
Pollutant	Total Emissions (TPY)
CO	6.29
CO ₂	8961.3
CO ₂ e	-
NO _x	7.57
SO ₂	0.052
PM	-
PM10	-
PM2.5	-
PM (Filterable)	1.87
PM10 (Filterable)	1.79
PM2.5 (Filterable)	1.52
PM (Condensable)	0.43
Lead	0.00005
Ammonia	0.004
Total VOCs	83.3
Total HAPs	3.92

RENEWAL NOTES

1. Incorporation of Permit Application Submittals
 - a. On January 14, 2015, Michelin was issued Air Permit No. 604-0009-X031 for Multex Undertread Cementing Extruder controlled by Boiler Incineration, BD7. Reference to this unit will be included in the Title V as it was not previously included in the last renewal.
 - b. On March 20, 2020, Michelin was issued Air Permit No. 604-0009-X034 for Extruder with Undertread Cementing, BD8. Authorization to Operate for this unit was issued on June 15, 2021.
 - c. On August 31, 2020, Michelin was issued Air Permit No. 604-0009-X035 for Diesel Fired Emergency Fire Pumps 1, 2, &3. Authorization to Operate for these units was issued on June 15, 2021.
2. Unit names in the permit section for 1st and 2nd stage tire assembly (EU004) were changed to more accurately reflect the process. EU005 was incorporated into this section as well as undertread cementing was removed from that process and only Michelin C operations remain.
3. Tire Curing and Finishing Operation
 - a. The lb per year limit of silane-based rubber has been removed, as the Anti-PSD VOC limit regarding the curing of silane based rubber inherently prevents the lb per year limit from being reached.
 - b. Language concerning visible emissions observations has been changed to visible emissions checks.
4. Boiler No. 3 is no longer regulated to burn No. 6 fuel oil, and may only burn natural gas.
5. Additional 40 CFR 60 BBB requirements were added that had not been previously addressed through any other permit.

Rubber Preparation (Milling, Cutting, Joining, and Complexing) (EU001)

Textile and metallic tissue for first and second stage tire fabrication process is cut/joined. In this process, heptane-like solvent is used to improve the track of the rubber to facilitate joining/complexing of the product after cutting.

NSPS:

This process is not subject to 40 CFR Part 60, Subpart BBB, “Standards of Performance for the Rubber Tire Manufacturing Industry” because the units are not listed as affected facilities.

Emission Standards:

These sources are not subject to any emissions standards other than those in the general provisos of the Title V permit.

Expected Emissions:

The expected VOC emissions are based on PAL calculations for the last 12 months and the expected HAP emissions are based on AP-42 emission factors and operating 8,760 hours per year. The expected emissions are shown below:

Rubber Preparation Uncontrolled Emissions		
Pollutant	lb/hr	TPY
PM	1.07E-05	4.69E-05
PM₁₀	1.07E-05	4.69E-05
PM_{2.5}	1.07E-05	4.69E-05
PM – filterable	1.07E-05	4.69E-05
PM₁₀ – filterable	1.07E-05	4.69E-05
PM_{2.5} – filterable	1.07E-05	4.69E-05
PM – condensable	-	-
Total VOCs	1.1598	10.6
Total HAPs	0.02420	0.106

Periodic Monitoring, Recordkeeping, & Reporting:

These sources are not subject to any emissions standards other than those in the general provisos. Therefore, the units are not subject to any additional monitoring or recordkeeping and reporting requirements other than those listed in the general provisos.

CAM:

These sources are uncontrolled; therefore, CAM does not apply.

BD1, BD3, BD4, and BD5 Extruding and Associated Milling (EU002)

Rubber is milled and extruded to form various components that will be used to build the tire. Emissions are from rubber heating in the extrusion process and the heptane-like solvent. BD1 has undertread cementing. BD1 and BD5 have mills associated with the extruder. Emissions from BD1 are voluntarily captured and controlled and emissions from BD3, BD4, and BD5 are uncontrolled.

NSPS:

BD3, BD4, and BD5 are not subject to 40 CFR Part 60, Subpart BBB, "Standards of Performance for the Rubber Tire Manufacturing Industry" because the units are not listed as affected facilities. BD1 is not subject to Subpart BBB because BD1 was constructed in 1979, prior to the January 20, 1983 applicability date for Subpart BBB.

Emission Standards:

These sources are not subject to any emissions standards other than those in the general provisos of the Title V permit.

Expected Emissions:

The expected VOC emissions are based on PAL calculations for the last 12 months and the expected HAP emissions are based on AP-42 emission factors and operating 8,760 hours per year. The expected emissions are shown below:

BD1, BD3, BD4, & BD5 Extruding and Associated Milling Uncontrolled Emissions		
Pollutant	lb/hr	TPY
PM	8.86E-05	3.88E-04
PM₁₀	8.86E-05	3.88E-04
PM_{2.5}	8.86E-05	3.88E-04
PM – filterable	8.86E-05	3.88E-04
PM₁₀ – filterable	8.86E-05	3.88E-04
PM_{2.5} – filterable	8.86E-05	3.88E-04
PM – condensable	-	-
Total VOCs	5.7078	25.2
Total HAPs	0.1473	0.645

Periodic Monitoring, Recordkeeping, & Reporting:

These sources are not subject to any emissions standards other than those in the general provisos. Therefore, the units are not subject to any additional monitoring or recordkeeping and reporting requirements other than those listed in the general provisos.

CAM:

These sources are uncontrolled; therefore, CAM does not apply.

BD2, BD6, BD7, and BD8 Extruders with Undertread Cementing and Boiler Incineration (EU003)

Rubber is milled and extruded to form various components that will be used to build the tire. Emissions are from rubber heating in the extrusion process and the heptane-like solvent. All four extruders have undertread cementing. Undertread cementing emissions are controlled by exhausting to the boilers for incineration.

NSPS:

The undertread cementing portion of BD2, BD6, BD7, and BD8 are subject to the applicable requirements in 40 CFR Part 60, Subpart BBB, “Standards of Performance for the Rubber Tire Manufacturing Industry”.

Emission Standards:

The facility shall for each undertread cementing operation discharge into the atmosphere no more than 25 percent of the VOC used (75 percent emission reduction) for each month.

40 CFR Part 60 Subpart BBB, §60.542(a)(1)(i)

Expected Emissions:

The expected VOC emissions are based on PAL calculations for the last 12 months and the expected HAP emissions are based on AP-42 emission factors and operating 8,760 hours per year. The expected emissions are shown below:

BD2, BD6, BD7, & BD8 Extruders with Undertread Cementing Uncontrolled Emissions		
Pollutant	lb/hr	TPY
PM	6.28E-05	2.75E-04
PM₁₀	6.28E-05	2.75E-04
PM_{2.5}	6.28E-05	2.75E-04
PM – filterable	6.28E-05	2.75E-04
PM₁₀ – filterable	6.28E-05	2.75E-04
PM_{2.5} – filterable	6.28E-05	2.75E-04
PM – condensable	-	-
Total VOCs	11.5068	50.4
Total HAPs	0.1856	0.813

Compliance and Performance Test Methods and Procedures

The owner or operator of an affected facility who elects to use a VOC emission reduction system with a control device that destroys VOC (e.g., incinerator), as described under §60.543(g), shall repeat the performance test when directed by the Administrator or when the owner or operator elects to operate the capture system or control device at conditions different from the most recent determination of overall reduction efficiency. The performance test shall be conducted in accordance with the procedures described under §60.543(f)(2)(i) through (iv).

40 CFR Part 60, Subpart BBB, §60.543(b)(2) & §60.543(g)

In determining compliance for each undertread cementing operation, the owner or operator shall include all the VOC used, recovered, or destroyed from cements and organic solvent-based green tire sprays including those cements or sprays used for tires other than those defined under §60.541(a).

40 CFR Part 60, Subpart BBB, §60.543(l)

The facility shall comply with all of the applicable test methods and procedures in 40 CFR §60.547(a).

40 CFR Part 60, Subpart BBB, §60.547(a)(1)-(5)

Controlled VOC emissions from these units shall be determined by applying the overall VOC reduction factor determined during source testing to total VOC usage.

ADEM Admin. Code r. 335-3-16-.05(c)1.

Emission Monitoring:

Within 90 calendar days after electing to operate the capture or control device at conditions different from the most recent determination of overall reduction efficiency, the owner or operator of this facility shall conduct a performance test for the determination of VOC emissions. Compliance with the VOC standards shall be determined by conducting performance tests in accordance with the methods listed in the preceding section.

ADEM Admin. Code r. 335-3-16-.05(c)1.

The owner or operator of an affected facility who elects to use a VOC emission reduction system with a control device that destroys VOC (e.g., incinerator), as described under §60.543(g), shall repeat the performance test when directed by the Administrator or when the owner or operator elects to operate the capture system or control device at conditions different from the most recent determination of overall reduction efficiency. The performance test shall be conducted in accordance with the procedures described under §60.543(f)(2)(i) through (iv).

40 CFR Part 60, Subpart BBB, §60.543(b)(2) & §60.543(g)

The facility shall install, calibrate, maintain, and operate according to manufacturer's specifications, a temperature monitoring device equipped with a continuous recorder for the temperature of the gas stream in the combustion zone of the incinerator (Boilers 1-4). The temperature monitoring device shall have an accuracy of 1 percent of the temperature being measured in °C or ± 0.5 °C, whichever is greater.

40 CFR Part 60 Subpart BBB, §60.544(a)(1)

An owner or operator of an undertread cementing operation where a VOC recovery device other than a carbon absorber is used to meet the performance requirements specified under §60.543(j)(6), shall provide to the Administrator information describing the operation of the control device and the process parameter(s) which would indicate proper operation and maintenance of the device. The Administrator may request further information and will specify appropriate monitoring procedures or requirements.

40 CFR Part 60 Subpart BBB, §60.544(b)

CAM:

These sources do not have pre-controlled potential emissions greater than any major source threshold; therefore, CAM does not apply.

Recordkeeping and Reporting:

Records of VOC content of any cements or sprays used in this process shall be kept in a permanent form suitable for inspection and shall be made available to the permitting authority upon request. These records shall be maintained for at least five (5) years from the date of generation.

ADEM Admin. Code r. 335-3-16-.05(c)

The facility shall maintain continuous records of the temperature of the gas stream in the combustion zone of the incinerator and records of all 3-hour periods of operation for which the average temperature of the gas stream in the combustion zone was more than 28 °C (50 °F) below the combustion zone temperature measured during the most recent determination of the destruction efficiency of the thermal incinerator that demonstrated that the affected facility was in compliance.

40 CFR Part 60 Subpart BBB, §60.545(a)

The facility shall report the results of the performance tests required under §60.543(b)(2). The following data shall be included in the report for each of the performance tests: The emission control device efficiency (E), the capture system efficiency (Fc), the face velocity through each permanent opening in the capture system with the temporary openings closed, and the overall system emission reduction (R).

40 CFR Part 60 Subpart BBB, §60.546(c)(4)

The facility shall include the following data measured by the temperature monitoring device, in the report for each performance test specified under §60.546(c): The average combustion temperature measured at least every 15 minutes and averaged over the performance test period of incinerator destruction efficiency for each thermal incinerator.

40 CFR Part 60 Subpart BBB, §60.546(e)(1)

Once every 6 months the facility shall report each 3-hour period of operation for which the average temperature of the gas stream in the combustion zone of a thermal incinerator, as measured by the temperature monitoring device, is more than 28°C (50°F) below the combustion zone temperature measured during the most recent determination of the destruction efficiency of the thermal incinerator that demonstrated that the affected facility was in compliance. If no exceedances occurred during the reporting period, a letter shall be sent indicating that no exceedances occurred.

40 CFR Part 60 Subpart BBB, §60.546(f)(4)

1st and 2nd Stage Tire Assembly with Michelin C Process (EU004)

Various rubber tire components are prepared and assembled in two stages to produce a green tire. Heptane-like solvent may be applied in the 2nd stage. Air emissions from the stages of tire building are a result of the heptane-like solvent use and rubber heating from limited extruding. There are no control devices on these units. This process (collectively referred to as EU004) consists of the following units:

1 st Stage	Q1	2 nd Stage	1Q
	R1, R2, R3, R4, R5, R6, R7		1R, 2R, 3R, 4R, 5R, 6R, 7R
	S1, S2, S3		1S, 3S
	T1, T2, T3, T4, T5, T6, T7, T8		0T, 1T, 2T, 3T, 4T, 5T, 6T, 7T

NSPS:

The Michelin C portions of 1Q, 1R, 2R, 3R, 4R, 5R, 6R, 7R, 1S, 3S, 0T, 1T, 2T, 3T, 4T, 5T, 6T, and 7T (2nd Stage) are subject to the applicable requirements in 40 CFR Part 60, Subpart BBB, “Standards of Performance for the Rubber Tire Manufacturing Industry”. The 1st stage tire builders are not subject to Subpart BBB because the units are not listed as affected facilities.

Emission Standards:

The emissions of volatile organic compounds (VOC) from each Michelin C portion of 1Q, 1R, 2R, 3R, 4R, 5R, 6R, 7R, 1S, 3S, 0T, 1T, 2T, 3T, 4T, 5T, 6T, and 7T shall not exceed the limits below, depending on the duration of the compliance period:

- (a) 1,570 kilograms of VOC per 28 days
- (b) 1,630 kilograms of VOC per 29 days
- (c) 1,690 kilograms of VOC per 30 days
- (d) 1,740 kilograms of VOC per 31 days
- (e) 1,970 kilograms of VOC per 35 days

40 CFR Part 60 Subpart BBB, §60.542(a)(10)(ii)

The combined total VOC emissions from Units Q1 and 1Q shall not exceed 39.5 tons during any consecutive twelve (12) month period.

ADEM Admin. Code r. 335-3-14-.04 (Anti-PSD) [see Air Permit No. 604-0009-X005 issued January 26, 1987]

Expected Emissions:

The expected VOC emissions are based on PAL calculations for the last 12 months and the expected HAP emissions are based on AP-42 emission factors and operating 8,760 hours per year. The emissions are total for all tire builders (EU004 & EU005). The expected emissions are shown below:

1 st and 2 nd Stage Tire Builders Uncontrolled Emissions		
Pollutant	lb/hr	TPY
Total VOCs	58.5845	256.6
Total HAPs	-	-

Compliance and Performance Test Methods and Procedures

For each Michelin C operation, the following procedure shall be used to determine compliance with the applicable uncontrolled monthly VOC use limit:

- (a) Determine the density and weight fraction of VOC (including dilution VOC) in each cement from its formulation data or by analysis of the cement using Method 24 of 40 CFR Part 60, Appendix A.
- (b) Calculate the total mass of VOC used at the affected facility for the month (M_o) using the following procedure:
 - a. For each facility for which cement is delivered in batch or via a distribution system that serves only the affected facility:

$$M_o = \sum_{i=1}^a L_{c_i} D_{c_i} W_{o_i}$$

Where:

a = the number of different cements used during the month

L_c = volume of cement used during for a month (liters (gallons))

D_c = density of cement (grams/liter (lb/gallon))

W_o = weight fraction of VOC in a cement

- (c) Determine the time duration of the monthly compliance period (T_d).

40 CFR Part 60 Subpart BBB, §60.543(c)

In determining compliance for each Michelin-C-automatic operation, the owner or operator shall include all the VOC used, recovered, or destroyed from the cement(s) including those cements used for tires other than those defined under 40 CFR §60.541(a).

40 CFR Part 60 Subpart BBB, §60.543(l)

The VOC content in the cement(s) shall be determined from formulation data or by analysis of the cement using Method 24 of 40 CFR Part 60, Appendix A.

40 CFR Part 60 Subpart BBB, §60.547(a)(1)

If testing of the emissions point is required, volatile organic compound (VOC) emissions shall be determined in accordance with Method 25 of 40 CFR Part 60, Appendix A.

40 CFR Part 60 Subpart BBB, §60.547(a)(2)

The facility shall comply with all of the applicable test methods and procedures in 40 CFR §60.547(a).

40 CFR Part 60 Subpart BBB, §60.547(a)(1)-(5)

Emission Monitoring:

A monthly performance test shall be conducted to demonstrate compliance with the VOC standards in 40 CFR §60.542(a)(10)(ii) in accordance with the requirements of 40 CFR §60.543(c).

40 CFR Part 60 Subpart BBB, §60.543(b)(1)

CAM:

These sources are uncontrolled; therefore, CAM does not apply.

Recordkeeping and Reporting:

Records of VOC content of any cements or sprays used in this process shall be kept in a permanent form suitable for inspection and shall be made available to the permitting authority upon request. These records shall be maintained for at least five (5) years from the date of generation.

ADEM Admin. Code r. 335-3-16-.05(c)

Records summarizing the monthly VOC emissions from the undertread cementing portions of 1P, 2P, 1Q, 1R, 2R, 3R, 4R, 5R, 6R, 7R, 1S, 2S, 3S, 0T, 1T, 2T, 3T, 4T, 5T, 6T, and 7T, and the number of days in each compliance period shall be kept in a permanent form suitable for inspection and shall be made available to the permitting authority upon request. These records shall be maintained for at least five (5) years from the date of generation.

40 CFR Part 60 Subpart BBB, §60.545(d)

Monthly VOC emissions records shall be compiled no later than the tenth (10th) day of the month following each monthly reporting period.

ADEM Admin. Code r. 335-3-16-.05(c)2.

The facility shall maintain a record to the 12-month rolling total of VOC emissions from Units Q1 and 1Q. These records shall be compiled no later than the tenth (10th) day of the month following each monthly reporting period.

ADEM Admin. Code r. 335-3-16-.05(c)2.

The facility shall maintain records of the results of all monthly performance tests.

40 CFR Part 60 Subpart BBB, §60.545(e)

Once every 6 months, the facility shall report each monthly average VOC use rate that exceeds the monthly VOC usage limit.

40 CFR Part 60 Subpart BBB, §60.546(f)(2)

During any month, twelve (12) month period, or other compliance period during which there is an exceedance of the VOC emission limit, the Department shall be notified in writing within twenty-four (24) hours of determining the exceedance. The notification shall include the following:

- (a) Dates covered during the reporting period;
- (b) Amount of VOC used during the reporting period;
- (c) Amount of VOC emitted during the reporting period;
- (d) Description of the cause of the exceedance; and
- (e) Description of any corrective action taken.

ADEM Admin. Code r. 335-3-16-.05(c)3.

Tire Curing and Finishing Operation (EU007)

Green tires are cured (vulcanized) in individual curing presses. Prior to being placed in the press, each tire is sprayed with green tire spray, which acts as a mold release. The green tire spraying units are equipped with baffles to reduce PM emissions. Cured tires with white side walls are ground to expose the white side wall. The white side wall is sprayed with a protectant coating. Cured tires are verified to meet specifications. Tire may be RIS ground to meet specifications. Also, tires may require repair and additional grinding which occurs at a separate Tire Repair Station. Green Tire Sprayer No. 5 is controlled by an internal water bath system that does not exhaust outside. Green Tire Sprayer No. 6 is controlled by a hydrostatic precipitator. The white side wall (WSW) grinders 1-7 and the RIS grinders are controlled by cyclones. WSW8 exhausts to the basement.

NSPS:

Green Tire Sprayer No. 6 is subject to the applicable requirements in 40 CFR Part 60 Subpart BBB, "Standards of Performance for the Rubber Tire Manufacturing Industry". Green Tire Sprayer No. 5 is not subject to Subpart BBB because the tire sprayer was constructed prior to the January 20, 1983, applicability date for Subpart BBB. The remaining units in the tire curing and finishing operation are not subject to Subpart BBB because the units are not listed as affected facilities.

Emission Standards:

Visible emissions from this source shall not exceed the opacity limitations as specified in General Provision No. 29 of the Title V permit.

ADEM Admin. Code r. 335-3-4-.01(1)

No more than 37.7 tons of VOC emissions associated with the use of silane-based rubber shall be emitted from the curing operation during any consecutive twelve (12) month period.

ADEM Admin. Code r. 335-3-14-.04 (Anti-PSD) [see Air Permit No. 604-0009-X issued July 15, 2002]

Total particulate matter (PM) emissions from the Green Tire Spraying Operation shall not exceed 2.90 lb/hr.

ADEM Admin. Code r. 335-3-14-.04 (Anti-PSD) [see Air Permit No. 604-0009-X017 issued October 27, 2003]

Total PM emissions from the RIS Grinding Operation shall not exceed 1.30 lb/hr.

ADEM Admin. Code r. 335-3-14-.04 (Anti-PSD) [see Air Permit No. 604-0009-X019 issued October 27, 2003]

Total PM₁₀ emissions from the RIS Grinding Operation shall not exceed 0.60 lb/hr.

ADEM Admin. Code r. 335-3-14-.04 (Anti-PSD) [see Air Permit No. 604-0009-X019 issued October 27, 2003]

Total PM emissions from the White Sidewall Grinding Operation shall not exceed 4.20 lb/hr.

ADEM Admin. Code r. 335-3-14-.04 (Anti-PSD) [see Air Permit No. 604-0009-X019 issued October 27, 2003]

Total PM₁₀ emissions from the White Sidewall Grinding Operation shall not exceed 1.90 lb/hr.

ADEM Admin. Code r. 335-3-14-.04 (Anti-PSD) [see Air Permit No. 604-0009-X019 issued October 27, 2003]

VOC emissions from Green Tire Sprayer No. 6 shall not exceed 1.2 grams (0.0026 lb) per tire sprayed with an inside green tire spray for each month.

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

VOC emissions from Green Tire Sprayer No. 6 shall not exceed 9.3 grams (0.021 lb) per tire sprayed with an outside green tire spray for each month.

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

The sprays used by Green Tire Sprayer No. 6 shall be water-based and contain less than one (1%) percent VOC by weight.

40 CFR Part 60, Subpart BBB §60.543(b)(4)

Expected Emissions:

The expected PM emissions are based on an engineering estimate and the amount of tires processed per year, the expected VOC emissions are based on PAL calculations for the last 12 months, and the expected HAP emissions are based on AP-42 emission factors and operating 8,760 hours per year. The expected emissions are shown below:

Tire and Finishing Operation Uncontrolled Emissions		
Pollutant	lb/hr	TPY
PM	8.7068	38.136
PM₁₀	5.4215	23.746
PM_{2.5}	5.4215	23.746
PM – filterable	8.7068	38.136
PM₁₀ – filterable	5.4215	23.746
PM_{2.5} – filterable	5.4215	23.746
PM – condensable	-	-
Total VOCs	15.5708	68.2
Total HAPs	1.5090	6.6093

Compliance and Performance Test Methods and Procedures

If testing is required, Method 9 of 40 CFR Part 60, Appendix A shall be used in the determination of the opacity of the stack emissions.

ADEM Admin. Code r. 335-3-1-.05

If testing is required, Method 5 of 40 CFR Part 60, Appendix A shall be used in the determination of filterable PM emissions.

ADEM Admin. Code r. 335-3-1-.05

If testing is required, Method 201 or 201A of 40 CFR Part 51, Appendix M shall be used in the determination of PM₁₀ emissions.

ADEM Admin. Code r. 335-3-1-.05

If testing is required, Method 202 of 40 CFR Part 51, Appendix M shall be used in the determination of total (filterable and condensable) PM emissions.

ADEM Admin. Code r. 335-3-1-.05

The VOC content in the spray(s) used by Green Tire Sprayer No. 6 shall be determined from formulation data or by analysis of the spray using Method 24 of 40 CFR Part 60, Appendix A.

40 CFR Part 60, Subpart BBB, §60.547(a)(1)

If testing of the emissions point is required, volatile organic compound (VOC) emissions shall be determined in accordance with Method 25 of 40 CFR Part 60, Appendix A.

ADEM Admin. Code r. 335-3-1-.05 & 40 CFR Part 60 Subpart BBB, §60.547(a)(2)

The facility shall comply with all of the applicable test methods and procedures in 40 CFR §60.547(a).

40 CFR Part 60, Subpart BBB, §60.547(a)(1)-(5)

Emission Monitoring:

A check of instantaneous visible emissions from the stack associated with the hydrostatic precipitator shall be accomplished weekly while in operation.

ADEM Admin. Code r. 335-3-16-.05(c)1.

A check of instantaneous visible emissions from the stacks associated with the cyclones shall be accomplished weekly while in operation.

ADEM Admin. Code r. 335-3-16-.05(c)1.

If the observed instantaneous opacity from any unit is greater than ten (10%) percent, 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.

ADEM Admin. Code r. 335-3-16-.05(c)1.

If the average opacity during any Method 9 visible emission observation exceeds ten (10%) percent, corrective action shall be initiated within **two (2) hours**.

ADEM Admin. Code r. 335-3-16-.05(c)1.

For Green Tire Sprayer No. 6, the facility shall submit formulation data or the results of a Method 24 analysis annually to verify the VOC content of each tread end cement and each green tire spray material, provided the spraying formulation has not changed during the previous 12 months.

If the spray material formulation changes, formulation data or a Method 24 analysis of the new spray shall be conducted to determine the VOC content of the spray and reported within 30 days.

40 CFR Part 60, Subpart BBB, §60.543(b)(4)

CAM:

These sources do not have pre-controlled potential emissions greater than any major source threshold; therefore, CAM does not apply.

Recordkeeping and Reporting:

Records of the visible emissions checks shall be kept in a permanent form suitable for inspection. These records shall be maintained for a period of at least five (5) years from the date of generation and shall be made available to the permitting authority upon request.

ADEM Admin. Code r. 335-3-16-.05(c)2.

If a Method 9 visible emissions observation is required, the results shall be documented using the ADEM visible emissions observation report. These records shall be maintained for a period of at least five (5) years from the date of generation and shall be made available to the permitting authority upon request.

ADEM Admin. Code r. 335-3-16-.05(c)2.

Records summarizing the monthly and twelve (12) month rolling VOC emissions from the curing of silane-based rubber at this facility shall be kept in a permanent form suitable for inspection and shall be made available to the permitting authority upon request. These records shall be maintained for at least five (5) years from the date of generation.

ADEM Admin. Code r. 335-3-16-.05(c)2.

Monthly and updated twelve (12) month rolling VOC emissions from the curing of silane-based rubber shall be compiled no later than the tenth (10th) day of the month following each monthly reporting period.

ADEM Admin. Code r. 335-3-16-.05(c)2.

During any month, twelve (12) month period, or other compliance period during which there is an exceedance of one or more of the permitted emission limits, the Department shall be notified in writing within twenty-four (24) hours of determining the exceedance. The notification shall include the following:

- (a) Dates covered during the reporting period.
- (b) Amount of pollutant emitted during the reporting period.
- (c) Description of the cause of the exceedance.
- (d) Description of any corrective action taken.

ADEM Admin. Code r. 335-3-16-.05(c)3.

A semi-annual monitoring report shall be submitted to the Department **within sixty (60) days of the end of each semi-annual reporting period** as determined by the anniversary dates of the permit. The semi-annual monitoring periods shall cover the following dates: [INSERT DATE], and [INSERT DATE] of each calendar year. This report shall include the following:

- (a) Calendar dates covered in the reporting period.
- (b) All visible emissions (VE) exceedances.
- (c) A description of the cause of any exceedance.
- (d) A description of any corrective action taken.
- (e) A statement of certification of truth, accuracy, and completeness as described in General Proviso No. 9.
- (f) Signature of the responsible official as required by General Proviso No. 9.

ADEM Admin. Code r. 335-3-16-.05(c)3.

The facility shall maintain records of formulation data or the results of Method 24 analysis conducted to verify the VOC content of the spray(s) used by Green Tire Sprayer No. 6. These records shall be maintained in a permanent form suitable for inspection and shall be made available to the permitting authority upon request. These records shall be maintained for at least five (5) years from the date of generation.

40 CFR Part 60, Subpart BBB, §60.545(f)

Once every 6 months, the facility shall report each monthly average VOC emission rate that exceeds the VOC emission limit per tire for Green Tire Sprayer No. 6.

40 CFR Part 60, Subpart BBB, §60.546(f)(1)

The facility shall furnish the Administrator, within 60 days initially and annually thereafter, formulation data or Method 24 results to verify the VOC content of the water-based sprays in use by Green Tire Sprayer No. 6. If the spray formulation changes before the end of the 12-month period, formulation data or Method 24 results to verify the VOC content of the spray shall be reported within 30 days of the change.

40 CFR Part 60, Subpart BBB, §60.546(j)

Tringle Spraying Operation with Baghouse (EU015)

Metal tringles are sprayed with zinc stearate. Emissions are controlled by a baghouse.

NSPS:

The Tringle Spraying Operation is not subject to 40 CFR Part 60, Subpart BBB because the units are not listed as affected facilities.

Emission Standards:

Visible emissions from this source shall not exceed the opacity limitations as specified in General Proviso No. 29 of the Title V permit.

ADEM Admin. Code r. 335-3-4-.01(1)

Total particulate matter (PM) emissions from this source shall not exceed 0.10 lb/hr.

ADEM Admin. Code r. 335-3-14-.04 (Anti-PSD) [see Air Permit No. 604-0009-X021 issued October 27, 2003]

Expected Emissions:

The expected PM emissions are based on an engineering estimate and the amount of tringles sprayed per year. The expected emissions are shown below:

Tringle Spraying Operation Uncontrolled Emissions		
Pollutant	lb/hr	TPY
PM	0.06301	0.276
PM₁₀	0.4817	0.211
PM_{2.5}	0.01598	0.070
PM – filterable	0.06301	0.276
PM₁₀ – filterable	0.4817	0.211
PM_{2.5} – filterable	0.01598	0.070
PM – condensable	-	-
Total VOCs	-	-
Total HAPs	5.936E-04	0.0026

Compliance and Performance Test Methods and Procedures

If testing is required, Method 9 of 40 CFR Part 60, Appendix A shall be used in the determination of the opacity of the stack emissions.

ADEM Admin. Code r. 335-3-1-.05

If testing is required, Method 5 of 40 CFR Part 60, Appendix A shall be used in the determination of PM emissions.

ADEM Admin. Code r. 335-3-1-.05

Emission Monitoring:

A check of instantaneous visible emissions from the stack associated with the baghouse shall be accomplished weekly while in operation.

ADEM Admin. Code r. 335-3-16-.05(c)1.

If the observed instantaneous opacity from any unit is greater than ten (10%) percent, 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.

ADEM Admin. Code r. 335-3-16-.05(c)1.

If the average opacity during any Method 9 visible emission observation exceeds ten (10%) percent, corrective action shall be initiated within **two (2) hours**.

ADEM Admin. Code r. 335-3-16-.05(c)1.

CAM:

This source does not have pre-controlled potential emissions greater than any major source threshold; therefore, CAM does not apply.

Recordkeeping and Reporting:

Records of the visible emissions checks shall be kept in a permanent form suitable for inspection. These records shall be maintained for a period of at least five (5) years from the date of generation and shall be made available to the permitting authority upon request.

ADEM Admin. Code r. 335-3-16-.05(c)2.

If a Method 9 visible emissions observation is required, the results shall be documented using the ADEM visible emissions observation report. These records shall be maintained for a period of at least five (5) years from the date of generation and shall be made available to the permitting authority upon request.

ADEM Admin. Code r. 335-3-16-.05(c)2.

A semi-annual monitoring report shall be submitted to the Department **within sixty (60) days of the end of each semi-annual reporting period** as determined by the anniversary dates of the permit. The semi-annual monitoring periods shall cover the following dates: [INSERT DATE], and [INSERT DATE] of each calendar year. This report shall include the following:

- (g) Calendar dates covered in the reporting period.
- (h) All visible emissions (VE) exceedances.
- (i) A description of the cause of any exceedance.
- (j) A description of any corrective action taken.
- (k) A statement of certification of truth, accuracy, and completeness as described in General Proviso No. 9.
- (l) Signature of the responsible official as required by General Proviso No. 9.

ADEM Admin. Code r. 335-3-16-.05(c)3.

Boilers

- **EU009 – 50.0 MMBtu/hr Natural Gas Fired Boiler (Boiler 3)**
- **EU010 – Two (2) 25.0 MMBtu/hr Natural Gas and No. 2 Fuel oil Fired Boilers (Boiler 1 & 2)**

NSPS:

These boilers are not subject to 40 CFR Part 60, Subpart Dc, “Standards of Performance for Small Industrial- Commercial-Institutional Steam Generating Units” because the boilers were constructed before the applicability date of June 9, 1989 for Subpart Dc.

MACT:

The boilers are not subject to 40 CFR Part 63, Subpart JJJJJ, “National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources” because gas-fired boilers are exempt [40 CFR §63.11195(e)].

Emission Standards:

Particulate emissions from the boilers shall not exceed that which is given by the equation in ADEM Admin. Code r. 335-3-4-.03(1).

ADEM Admin. Code r. 335-3-4-.03(1)

Sulfur dioxide emissions from each boiler shall not exceed 4.0 lb/MMBtu.

ADEM Admin. Code r. 335-3-5-.01(1)(b)

Only natural gas shall be burned in Boilers 1 & 2 unless in periods of curtailment, gas supply emergencies, or periodic testing on liquid fuel.

ADEM Admin. Code r. 335-3-16-.05(a)

No more than a combined total of 35,000 gallons of No. 2 fuel oil shall be burned in Boilers 1 & 2 during any consecutive twelve (12) month period.

ADEM Admin. Code r. 335-3-14-.04 (Anti-PSD) [see Air Permit No. 604-0009-Z001 & Z002 issued October 13, 1988]

Only natural gas shall be burned in Boiler 3.

ADEM Admin. Code r. 335-3-16-.05(a)

Sulfur content of the fuel oil burned in Boilers 1 & 2 shall not exceed 0.5% by weight.

ADEM Admin. Code r. 335-3-14-.04 (Anti-PSD) [see Air Permit No. 604-0009-Z001 & Z002 issued October 13, 1988]

Expected Emissions:

The expected emissions are based on AP-42 emission factors, burning natural gas, and operating 8,760 hours per year. The expected emissions for all three boilers are show below:

Boilers Uncontrolled Emissions						
Pollutant	25 MMBtu/hr Boiler 1 (EU010a)		25 MMBtu/hr Boiler 2 (EU010b)		50 MMBtu/hr Boiler 3 (EU009)	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
CO	2.0269	8.878	2.0269	8.878	4.0541	17.757
CO₂	2,895.7534	12,683.40	2,895.7534	12,683.40	5791.51	25366.80
CO₂e	2925.0639	12,811.78	2925.0639	12,811.78	5852.18	25632.55
NO₂	2.4130	10.569	2.4130	10.569	4.8240	21.129
SO₂	0.01438	0.063	0.01438	0.063	0.02900	0.127
PM	0.1833	0.803	0.1833	0.803	0.3669	1.607
PM₁₀	0.1833	0.803	0.1833	0.803	0.3669	1.607
PM_{2.5}	0.1833	0.803	0.1833	0.803	0.3669	1.607
PM – filterable	0.04589	0.201	0.04589	0.201	0.09178	0.402
PM₁₀ – filterable	0.04589	0.201	0.04589	0.201	0.09178	0.402
PM_{2.5} – filterable	0.04589	0.201	0.04589	0.201	0.09178	0.402
PM – condensable	0.1374	0.602	0.1374	0.602	0.2751	1.205
Lead & Lead Compounds	1.2055E-05	5.28E-05	1.2055E-05	5.28E-05	2.4E-05	1.06E-04
Ammonia	0.001142	0.005	0.001142	0.005	0.002420	0.0106
Total VOCs	0.1370	0.6	0.1370	0.6	0.2740	1.2
Total HAPs	0.04543	0.199	0.04543	0.199	0.09087	0.398

Compliance and Performance Test Methods and Procedures

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

ADEM Admin. Code r. 335-3-1-.05

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

ADEM Admin. Code r. 335-3-1-.05

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

ADEM Admin. Code r. 335-3-1-.05

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

ADEM Admin. Code r. 335-3-1-.05

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

ADEM Admin. Code r. 335-3-1-.05

The sulfur content of the fuel oil burned in the boilers shall be determined by procedures found in ASTM 129-00.

ADEM Admin. Code r. 335-3-1-.05

Emission Monitoring:

When firing fuel oil, an observation of instantaneous visible emissions from the stacks associated with these units shall be accomplished daily by an individual certified to determine opacity.

ADEM Admin. Code r. 335-3-16-.05(c)1.

If the observed instantaneous opacity is greater than ten (10%) percent, 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.

ADEM Admin. Code r. 335-3-16-.05(c)1.

If the average opacity during the Method 9 visible emission observation exceeds ten (10%) percent, corrective action must be initiated within two (2) hours.

ADEM Admin. Code r. 335-3-16-.05(c)1.

Compliance with the fuel oil sulfur content limit shall be determined from either a certification provided by the fuel oil supplier or laboratory test results obtained by the facility.

ADEM Admin. Code r. 335-3-16-.05(c)1.

CAM:

These sources are uncontrolled; therefore, CAM does not apply.

Recordkeeping and Reporting:

Monthly, and twelve (12) month rolling total natural gas and fuel oil usage in this boiler must be kept in a form suitable for inspection. The records also shall be retained in a permanent form suitable for inspection for at least five (5) years from the date of generation and shall be made available upon request.

ADEM Admin. Code r. 335-3-16-.05(c)2.

If utilized, fuel oil supplier certificates shall contain the name of the oil supplier and a statement from the oil supplier that the oil complies with the sulfur content limit, and shall be kept in a permanent form suitable for inspection for a period of five (5) years from the date of generation and shall be made available upon request.

ADEM Admin. Code r. 335-3-16-.05(c)2.

A semi-annual report summarizing the type and quantity of each fuel burned in this unit shall be submitted to the Department within sixty (60) days of the end of each semi-annual reporting period as determined by the anniversary dates of the permit. The semi-annual monitoring periods shall cover the following dates: September 1st through February 28th, and March 1st through August 31st of each calendar year. This report shall include the following:

- (a) Calendar dates covered in the reporting period.
- (b) Amounts of each fuel combusted in this unit during the reporting period.
- (c) Twelve (12) month rolling total of each fuel burned in this boiler during the reporting period.
- (d) A tabulated summary of fuel oil supplier certification(s).
- (e) A statement of certification of truth, accuracy, and completeness as described in General Proviso No. 9.
- (f) Signature of the responsible official as required by General Proviso No. 9.

ADEM Admin. Code r. 335-3-16-.05(c)3.

Records of the observation date, observation time, emission point designation, name of the observer, expiration date of observer's certification, observed opacity, and any corrective actions taken during each visible emissions observation shall be kept in a permanent form suitable for inspection. These records shall be maintained for a period of at least five (5) years from the date of generation and shall be made available to the permitting authority upon request.

ADEM Admin. Code r. 335-3-16-.05(c)2.

If a visible emissions observation utilizing Method 9 is required, the results shall be documented using the ADEM visible emissions observation report. These records shall be maintained for a period of at least five (5) years from the date of generation and shall be made available to the permitting authority upon request.

ADEM Admin. Code r. 335-3-16-.05(c)2.

A semi-annual monitoring report shall be submitted to the Department within sixty (60) days of the end of each semi-annual reporting period as determined by the anniversary dates of the permit. The semi-annual monitoring periods shall cover the following dates: September 1st through February 28th, and March 1st through August 31st of each calendar year. This report shall include the following:

- (a) Calendar dates covered in the reporting period.
- (b) All visible emissions (VE) exceedances.
- (c) A description of the cause of any exceedance.

- (d) A description of any corrective action taken.
- (e) A statement of certification of truth, accuracy, and completeness as described in General Proviso No. 9.
- (f) Signature of the responsible official as required by General Proviso No. 9.

ADEM Admin. Code r. 335-3-16-.05(c)3.

Diesel Fired Emergency Fire Pumps

- **Diesel Fired Emergency Fire Pumps 1, 2, & 3**

NSPS:

These emergency generators are subject to 40 CFR Part 60 Subpart IIII “Standards of Performance for Stationary Compression Ignition Internal Combustion Engines”. These emergency generators must meet the applicable requirements in 40 CFR Part 63 Subpart ZZZZ “National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE)” by meeting the requirements of 40 CFR Part 60, Subpart IIII.

Emission Standards:

These units are subject to the applicable emission standards in Table 4 to 40 CFR Part 60, Subpart IIII.

40 CFR Part 60 Subpart IIII, §60.4205(c)

The facility must operate and maintain these units according to the manufacturer’s written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer, over the entire life of the engines.

40 CFR Part 60 Subpart IIII, §60.4206

These units must use diesel fuel that meets the requirements of 40 CFR §1090.305.

40 CFR Part 60 Subpart IIII, §60.4207(b)

These units shall be certified to the emission standards in 40 CFR §60.4205(c) for the same model year and NFPA nameplate engine power.

40 CFR Part 60 Subpart IIII, §60.4211(c)

These units must be installed and configured according to the manufacturer’s specifications.

40 CFR Part 60 Subpart IIII, §60.4211(c)

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 this unit is 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 non-emergency power as part of a financial arrangement with another entity. Any operation other than

emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in 40 CFR 60 Subpart IIII, is prohibited.

40 CFR Part 60 Subpart IIII, §60.4211(f)

Expected Emissions:

The expected emissions are based on AP-42 emission factors and a maximum operation of 500 hours per year. All the Diesel Fired Emergency Generators are shown below:

Diesel Fired Emergency Fire Pumps Uncontrolled Emissions		
Pollutant	lb/hr	TPY
CO	0.03567	0.15625
CO₂	62.0320	271.70
CO_{2e}	62.2443	272.63
NO₂	0.1403	0.61459
SO₂	5.8219E-04	0.00255
PM	5.5502E-03	0.02431
PM₁₀	5.5502E-03	0.02431
PM_{2.5}	5.5502E-03	0.02431
PM – filterable	3.3858E-03	0.01483
PM₁₀ – filterable	2.1644E-03	0.00948
PM_{2.5} – filterable	2.1644E-03	0.00948
PM – condensable	2.1644E-03	0.00948
Total VOCs	-	-
Total HAPs	0.0013670	0.006

Compliance and Performance Test Methods and Procedures

If testing is required, Method 9 of 40 CFR Part 60, Appendix A shall be used in the determination of the opacity of the stack emissions.

ADEM Admin. Code r. 335-3-1-.05

If testing is required, Method 5 of 40 CFR Part 60, Appendix A shall be used in the determination of PM emissions.

ADEM Admin. Code r. 335-3-1-.05

If testing is required, Method 7E of 40 CFR Part 60, Appendix A shall be used in the determination of NOx emissions.

ADEM Admin. Code r. 335-3-1-.05

If testing is required, Method 10 of 40 CFR Part 60, Appendix A shall be used in the determination of CO emissions.

ADEM Admin. Code r. 335-3-1-.05

Emission Monitoring

The facility must install non-resettable hour meters prior to startup of the engines.

40 CFR Part 60 Subpart IIII, §60.4209(a)

CAM:

These sources are uncontrolled; therefore, CAM does not apply.

Recordkeeping and Reporting:

The facility must record hours of operation of these units in emergency and non-emergency service that are recorded through a non-resettable hour meter. The facility must record the time of operation and the reason the engine was in operation during that time.

40 CFR Part 60 Subpart IIII, §60.4214(b)

Plant-Wide Applicability Limit (PAL)

Michelin North America, Inc. is subject to a PAL for VOC, effective May 24, 2013 [Air Permit No. 604-0009-X028].

Applicability:

Any physical change in or change in the method of operation of this facility that maintains its total source-wide emissions below the PAL level, meets the requirements in 335-3-14-.04-(23)(a) through (o), and complies with the PAL permit:

- (a) Is not a major modification for the PAL pollutant.
- (b) Does not have to be approved through the PSD program.

ADEM Admin. Code r. 335-3-14-.04(23)(a) through (o)

The facility shall continue to comply with any State or Federal applicable requirements (BACT, RACT, NSPS, synthetic minor limit, etc.) that may have applied either during the PAL effective period or prior to the PAL effective period.

ADEM Admin. Code r. 335-3-14-.04(23)(a) through (o)

At no time (during or after the PAL effective period) are emissions reductions of a PAL pollutant that occur during the PAL effective period creditable as decreases for purposes of offsets under Rule 335-3-14-.05 unless the level of the PAL is reduced by the amount of such emissions reductions and such reductions would be creditable in the absence of the PAL.

ADEM Admin. Code r. 335-3-14-.04(23)(a) through (o)

The PAL established in this permit only addresses the applicability criteria for VOCs under the state PSD Rule 335-3-14-.04. Any modifications to this source remain subject to applicable construction permit requirements in Rule 335-3-14 and the Title V operating permit modification procedures of Rule 335-3-16-.13 or 335-3-16-.14.

ADEM Admin. Code r. 335-3-14-.04(23)(a) through (o)

This PAL shall include fugitive emissions, to the extent quantifiable, from all emissions units that emit or have the potential to emit VOCs at the facility.

ADEM Admin. Code r. 335-3-14-.04(23)(a) through (o)

This PAL shall have a PAL effective period of 10 years from the date of issuance.

ADEM Admin. Code r. 335-3-14-.04(23)(a) through (o)

If the facility applies to renew this PAL in accordance with 335-3-14-.04(23)(j)(2), then the PAL shall not expire at the end of the PAL effective period. It shall remain in effect until a revised PAL permit is issued.

ADEM Admin. Code r. 335-3-14-.04(23)(a) through (o)

If the PAL expires, the facility is subject to the requirements of Rule 335-3-14-.04(23)(i).

ADEM Admin. Code r. 335-3-14-.04(23)(a) through (o)

Emission calculations for compliance purposes must include emissions from startups and shutdowns.

ADEM Admin. Code r. 335-3-14-.04(23)(a) through (o)

Emission Standards:

The annual emission limitation for this facility for this PAL shall be **457.90 Tons** of **VOC** in any consecutive rolling 12-month period (Tons per Year (TPY)). This PAL shall regulate emissions of **VOC**. For each month during the PAL effective period after the first 12 months of establishing this PAL limit, the sum of the monthly emissions from each emissions unit under the PAL for the previous 12 consecutive months shall be less than the PAL limit (a 12-month total, rolled monthly).

ADEM Admin. Code r. 335-3-14-.04(8)

Compliance:

The calculation procedures that the facility shall use to convert monitoring system data to monthly emissions and annual emissions based on a 12-month rolling total as required by 335-3-14-.04 (23)(l).

ADEM Admin. Code r. 335-3-14-.04(23)(a) through (o)

The facility using mass balance calculations to monitor PAL pollutant emissions from activities using coating or solvents shall meet the following requirements:

- (a) Provide a demonstrated means of validating the published content of VOC that is contained in or created by all materials used in or at the emission units.
- (b) Assume that the emission units emit all of the VOC that is contained in or created by any raw material or fuel used in or at the emission units, if it cannot otherwise be accounted for in the process.
- (c) Where the vendor of a material or fuel, which is used in or at the emission units, publishes a range of pollutant content from much material, the facility must use the highest value of the range to calculate the VOC emissions unless the Director determines there is site-specific data or a site-specific monitoring program to support another content within the range.

ADEM Admin. Code r. 335-3-14-.04(23)(a) through (o)

The facility using emissions factors to monitor VOC emissions shall meet the following requirements:

- (a) All emission factors shall be adjusted, if appropriate, to account for the degree of uncertainty or limitations in the factors' development.
- (b) The emissions units shall operate within the designated range of use for the emission factor, if applicable.
- (c) If technically practicable, the facility of a significant emission units that relies on an emission factor to calculate VOC emissions shall conduct validation testing to determine a site-specific emission factor within 6 months of PAL permit issuance, unless the Director determines that testing is not required.

For curing, Michelin shall validate the factor by reviewing the tire types that are being cured in comparison to the types that were used for the AP-42 factor testing and assuring that the correct tire types are being

used to estimate VOC emissions. In addition, Michelin shall use the highest (worst case) factor for VOC to assure that the estimate is the worst case and results in the highest VOC emissions estimate. A record shall be kept of the validation data.

ADEM Admin. Code r. 335-3-14-.04(23)(a) through (o)

Re-validation. All data used to establish the PAL pollutant must be revalidated through performance testing or other scientifically valid means approved by the Director. Such testing must occur at least once every 5 years after issuance of the PAL.

For curing, Michelin shall re-validate as described above in 14 (c) once every 5 years.

ADEM Admin. Code r. 335-3-14-.04(23)(a) through (o)

Emission Monitoring:

The facility will monitor all emissions units in accordance with the provisions under 335-3-14-.04(23)(l).

ADEM Admin. Code r. 335-3-14-.04(23)(a) through (o)

Recordkeeping and Reporting:

The facility shall retain the records under 334-3-14-.04(23)(m) on site. Such records may be retained in an electronic format.

ADEM Admin. Code r. 335-3-14-.04(23)(a) through (o)

A copy of all records necessary to determine compliance with any requirement of 335-3-14-.04-(23) and of the PAL, including a determination of each emissions unit's 12-month rolling total emissions, for 5 years from the date of such record shall be retained.

ADEM Admin. Code r. 335-3-14-.04(23)(a) through (o)

All records required under this PAL shall be kept on site. Such records may be retained in an electronic form. Accurate and understandable records will be maintained in a form suitable for inspection and be available immediately upon request. Copies of any records or background documentation will be provided upon request.

ADEM Admin. Code r. 335-3-14-.04(23)(a) through (o)

A copy of the following records shall be retained for the duration of the PAL effective period plus 5 years:

- (a) A copy of the PAL permit application and any applications for revisions to the PAL.
- (b) Each annual certification of compliance pursuant to title V and the data relied on in certifying the compliance.

ADEM Admin. Code r. 335-3-14-.04(23)(a) through (o)

Semi-annual monitoring reports and prompt deviation reports for this PAL permit shall be submitted to the Director in accordance with the schedule and requirements of the Title V Operating Permit for this facility.

- (a) *Semi-annual report.* This report shall contain the following information:
 - (1) The identification of the facility and the permit number.
 - (2) Total annual emissions (tons/year) based on a 12-month rolling total for each month in the reporting period recorded pursuant to 335-3-14-.04-(23)(m)1.
 - (3) All data relied upon, including, but not limited to, any Quality Assurance or Quality Control data, in calculating the monthly and annual PAL pollutant emissions.
 - (4) A list of any emissions units modified or added to the facility during the preceding 6-month period.
 - (5) The number, duration, and cause of any deviations or monitoring malfunctions (other than the time associated with zero and span calibration checks), and any corrective action taken.
 - (6) A notification of a shutdown of any monitoring system, whether the shutdown was permanent or temporary, the reason for the shutdown, the anticipated date that the monitoring system will be fully operational or replaced with another monitoring system, and whether the emissions unit monitored by the monitoring system continued to operate, and the calculation of the emissions of the pollutant or the number determined by method included in the permit, as provided by 335-3-14-.04-(23)(l)7.
 - (7) A signed statement by a responsible official (as defined in 335-3-16) certifying the truth, accuracy, and completeness of the information provided in the report.
- (b) *Deviation report.* The facility shall promptly submit reports of any deviations or exceedance of the PAL requirements, including periods where no monitoring is available. A report submitted pursuant to 335-3-16-.05(c)3.(ii) shall satisfy this reporting requirement. The reports shall contain the following information:
 - (1) The identification of the facility and the permit number;
 - (2) The PAL requirement that experienced the deviation or that was exceeded;
 - (3) Emissions resulting from the deviation or the exceedance; and
 - (4) A signed statement by a responsible official (as defined in 335-3-16) certifying the truth, accuracy, and completeness of the information provided in the report.
- (c) *Re-validation results.* The facility shall submit to the Director the results of any re-validation test or method within 3 months after completion of such test or method.

ADEM Admin. Code r. 335-3-14-.04(23)(a) through (o)

Environmental Justice:

ADEM utilized the EJSCREEN screening tool to perform an analysis of the area. Please refer to Appendix A.

Recommendation:

Based on the above analysis and pending the resolution of any comments received during the 30-day public comment period and 45-day EPA review, I recommend issuing Michelin North America, Inc.'s Title V MSOP renewal.

Jennifer Youngpeter
Energy Branch
Air Division

Date

Appendix A
Environmental Justice Screening

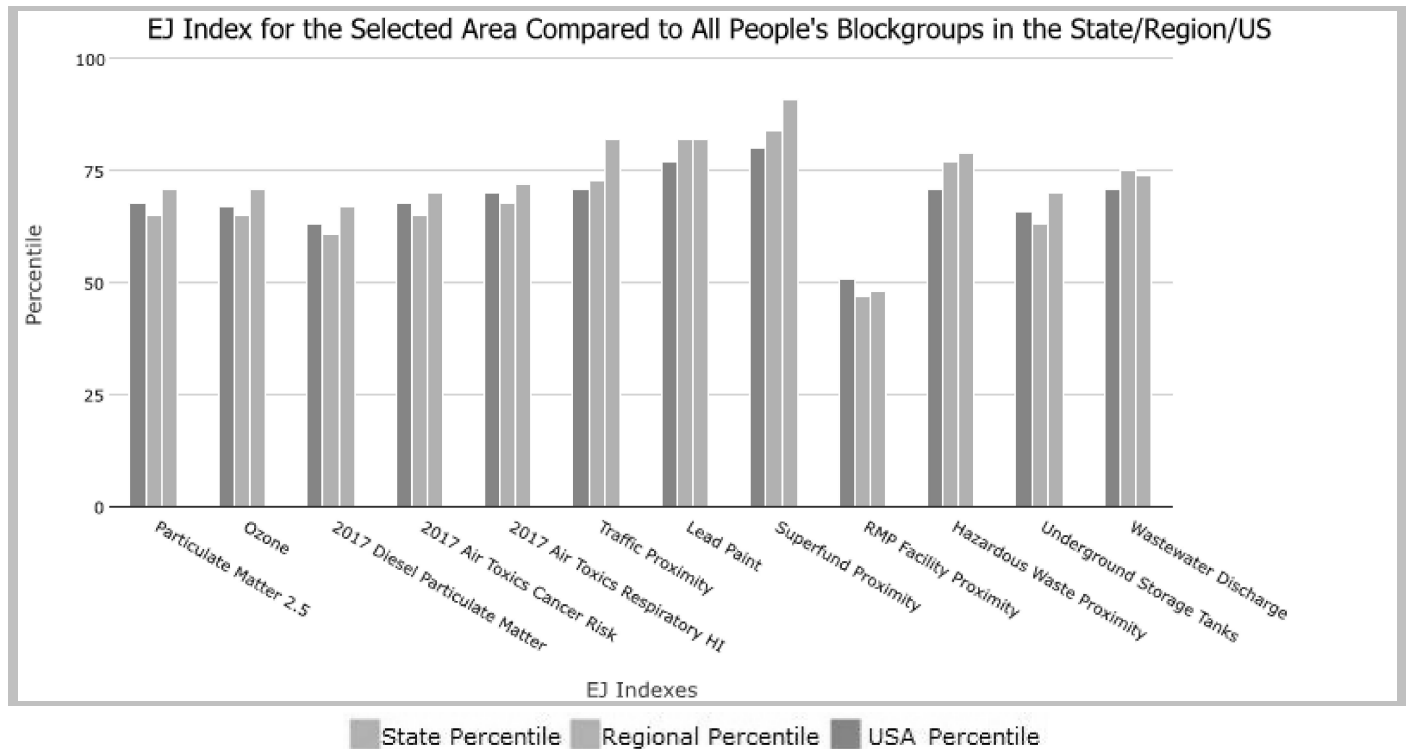
1 mile Ring Centered at 31.296228,-85.466638, ALABAMA, EPA Region 4

Approximate Population: 941

Input Area (sq. miles): 3.14

Michelin - Dothan

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
Environmental Justice Indexes			
EJ Index for Particulate Matter 2.5	71	65	68
EJ Index for Ozone	71	65	67
EJ Index for 2017 Diesel Particulate Matter*	67	61	63
EJ Index for 2017 Air Toxics Cancer Risk*	70	65	68
EJ Index for 2017 Air Toxics Respiratory HI*	72	68	70
EJ Index for Traffic Proximity	82	73	71
EJ Index for Lead Paint	82	82	77
EJ Index for Superfund Proximity	91	84	80
EJ Index for RMP Facility Proximity	48	47	51
EJ Index for Hazardous Waste Proximity	79	77	71
EJ Index for Underground Storage Tanks	70	63	66
EJ Index for Wastewater Discharge	74	75	71



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

1 mile Ring Centered at 31.296228,-85.466638, ALABAMA, EPA Region 4

Approximate Population: 941

Input Area (sq. miles): 3.14

Michelin - Dothan



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJScreen Report (Version 2.0)



1 mile Ring Centered at 31.296228,-85.466638, ALABAMA, EPA Region 4

Approximate Population: 941

Input Area (sq. miles): 3.14

Michelin - Dothan

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Pollution and Sources							
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	8.22	8.9	10	8.18	53	8.74	39
Ozone (ppb)	34.9	39.1	7	37.9	30	42.6	11
2017 Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	0.0948	0.216	11	0.261	<50th	0.295	<50th
2017 Air Toxics Cancer Risk* (lifetime risk per million)	30	34	55	31	80-90th	29	80-90th
2017 Air Toxics Respiratory HI*	0.5	0.47	91	0.4	95-100th	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	230	230	75	430	61	710	50
Lead Paint (% Pre-1960 Housing)	0.2	0.18	70	0.15	75	0.28	53
Superfund Proximity (site count/km distance)	0.16	0.054	95	0.083	88	0.13	80
RMP Facility Proximity (facility count/km distance)	0.3	0.41	67	0.6	55	0.75	48
Hazardous Waste Proximity (facility count/km distance)	0.63	0.83	60	0.62	72	2.2	48
Underground Storage Tanks (count/km ²)	0.26	1.7	34	3.5	28	3.9	29
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.00014	0.42	38	0.45	45	12	33
Socioeconomic Indicators							
Demographic Index	49%	36%	75	37%	72	36%	73
People of Color	48%	34%	73	39%	65	40%	64
Low Income	50%	37%	74	35%	77	31%	81
Unemployment Rate	6%	6%	60	6%	62	5%	64
Linguistically Isolated	11%	1%	98	3%	90	5%	85
Less Than High School Education	21%	14%	76	13%	80	12%	80
Under Age 5	3%	6%	26	6%	26	6%	24
Over Age 64	18%	17%	62	17%	64	16%	67

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's 2017 Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

For additional information, see: www.epa.gov/environmentaljustice

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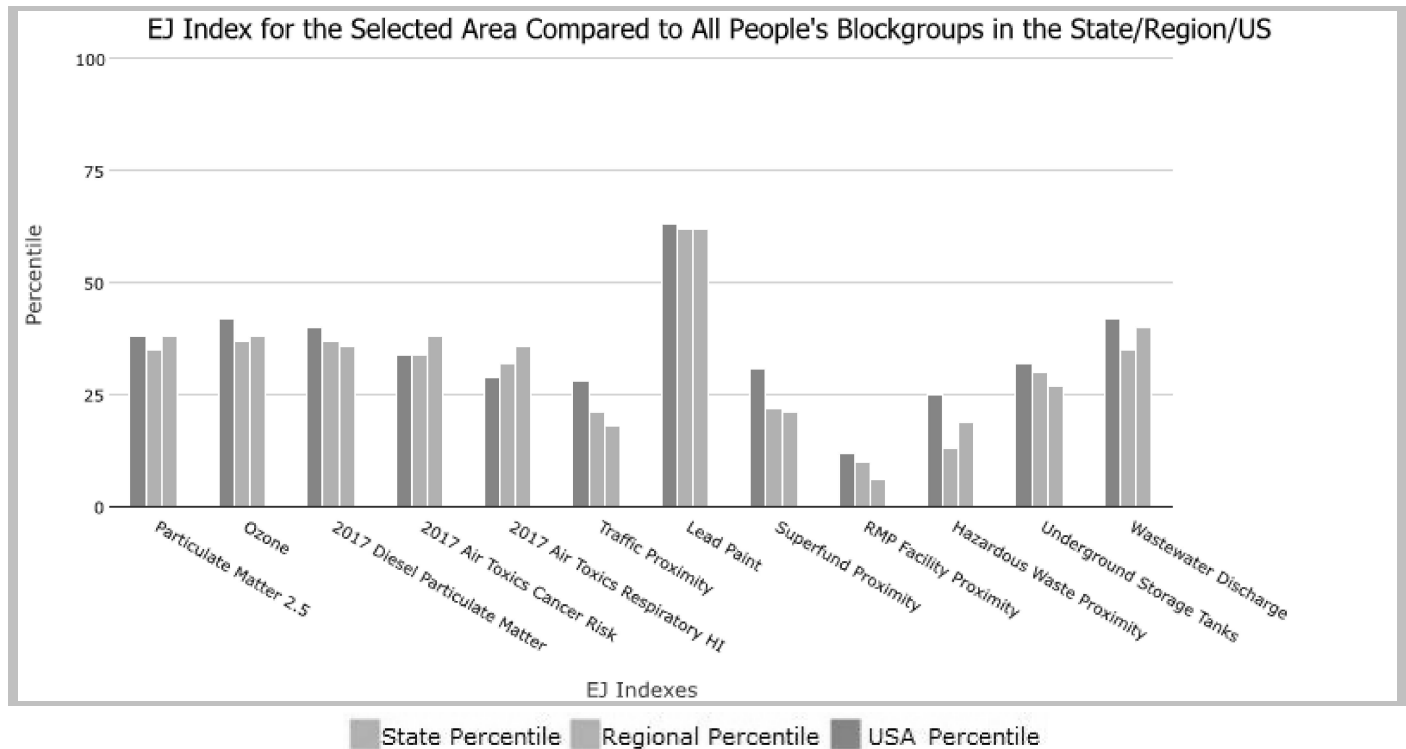
5 miles Ring Centered at 31.296228,-85.466638, ALABAMA, EPA Region 4

Approximate Population: 29,107

Input Area (sq. miles): 78.53

Michelin - Dothan

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
Environmental Justice Indexes			
EJ Index for Particulate Matter 2.5	38	35	38
EJ Index for Ozone	38	37	42
EJ Index for 2017 Diesel Particulate Matter*	36	37	40
EJ Index for 2017 Air Toxics Cancer Risk*	38	34	34
EJ Index for 2017 Air Toxics Respiratory HI*	36	32	29
EJ Index for Traffic Proximity	18	21	28
EJ Index for Lead Paint	62	62	63
EJ Index for Superfund Proximity	21	22	31
EJ Index for RMP Facility Proximity	6	10	12
EJ Index for Hazardous Waste Proximity	19	13	25
EJ Index for Underground Storage Tanks	27	30	32
EJ Index for Wastewater Discharge	40	35	42



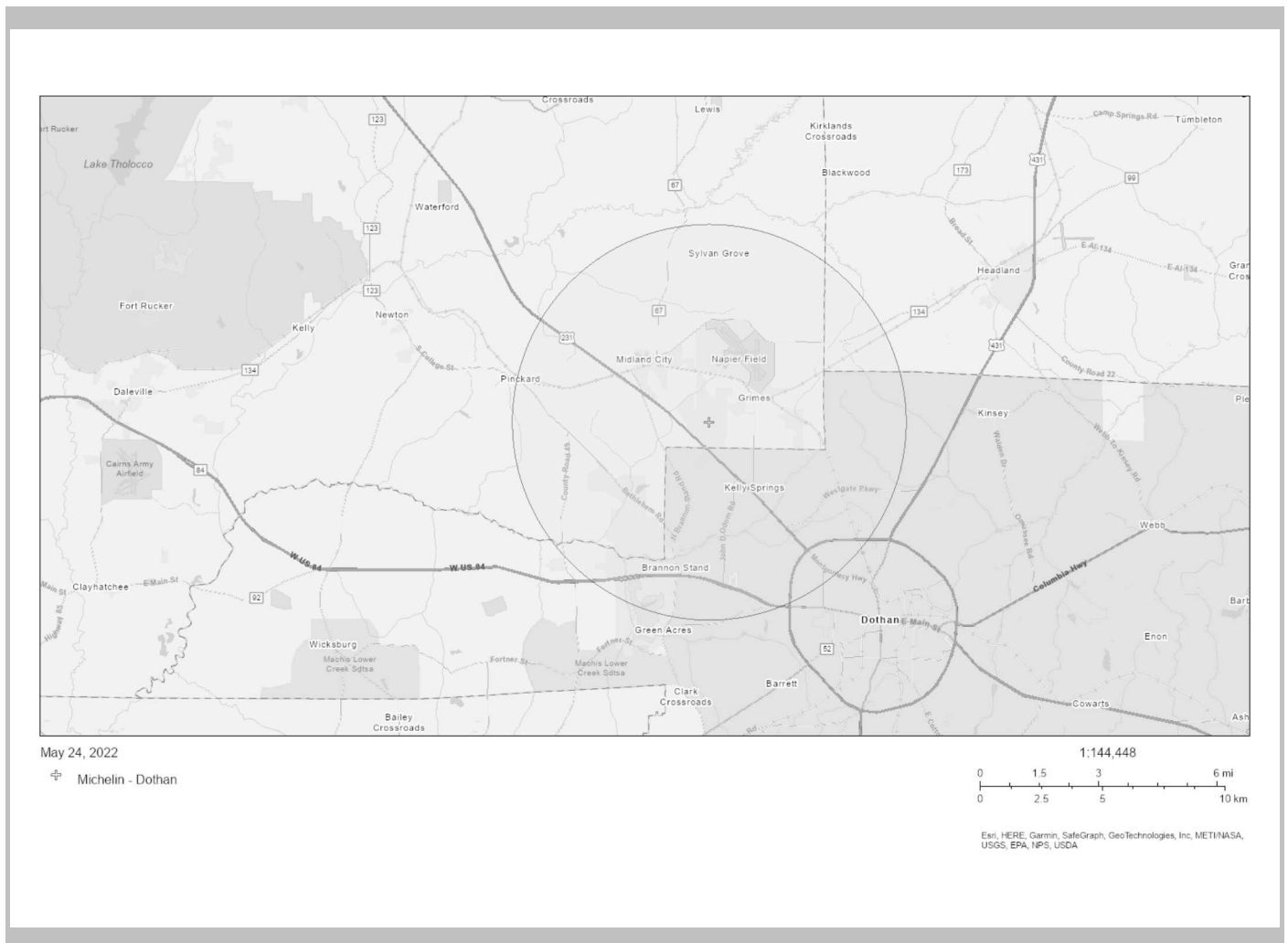
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5 miles Ring Centered at 31.296228,-85.466638, ALABAMA, EPA Region 4

Approximate Population: 29,107

Input Area (sq. miles): 78.53

Michelin - Dothan



Sites reporting to EPA	
Superfund NPL	1
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	4

EJScreen Report (Version 2.0)



5 miles Ring Centered at 31.296228,-85.466638, ALABAMA, EPA Region 4

Approximate Population: 29,107

Input Area (sq. miles): 78.53

Michelin - Dothan

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Pollution and Sources							
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	8.22	8.9	10	8.18	53	8.74	39
Ozone (ppb)	35	39.1	8	37.9	31	42.6	12
2017 Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	0.154	0.216	40	0.261	<50th	0.295	<50th
2017 Air Toxics Cancer Risk* (lifetime risk per million)	30	34	55	31	80-90th	29	80-90th
2017 Air Toxics Respiratory HI*	0.48	0.47	80	0.4	90-95th	0.36	90-95th
Traffic Proximity (daily traffic count/distance to road)	240	230	75	430	61	710	51
Lead Paint (% Pre-1960 Housing)	0.064	0.18	34	0.15	47	0.28	32
Superfund Proximity (site count/km distance)	0.12	0.054	91	0.083	83	0.13	72
RMP Facility Proximity (facility count/km distance)	1.1	0.41	88	0.6	82	0.75	77
Hazardous Waste Proximity (facility count/km distance)	0.83	0.83	65	0.62	77	2.2	53
Underground Storage Tanks (count/km ²)	2.2	1.7	75	3.5	63	3.9	60
Wastewater Discharge (toxicity-weighted concentration/m distance)	6.7E-05	0.42	33	0.45	39	12	28
Socioeconomic Indicators							
Demographic Index	31%	36%	49	37%	46	36%	51
People of Color	29%	34%	54	39%	46	40%	47
Low Income	32%	37%	43	35%	48	31%	57
Unemployment Rate	6%	6%	59	6%	59	5%	62
Linguistically Isolated	1%	1%	76	3%	57	5%	50
Less Than High School Education	9%	14%	37	13%	43	12%	50
Under Age 5	6%	6%	56	6%	56	6%	54
Over Age 64	18%	17%	61	17%	63	16%	66

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's 2017 Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

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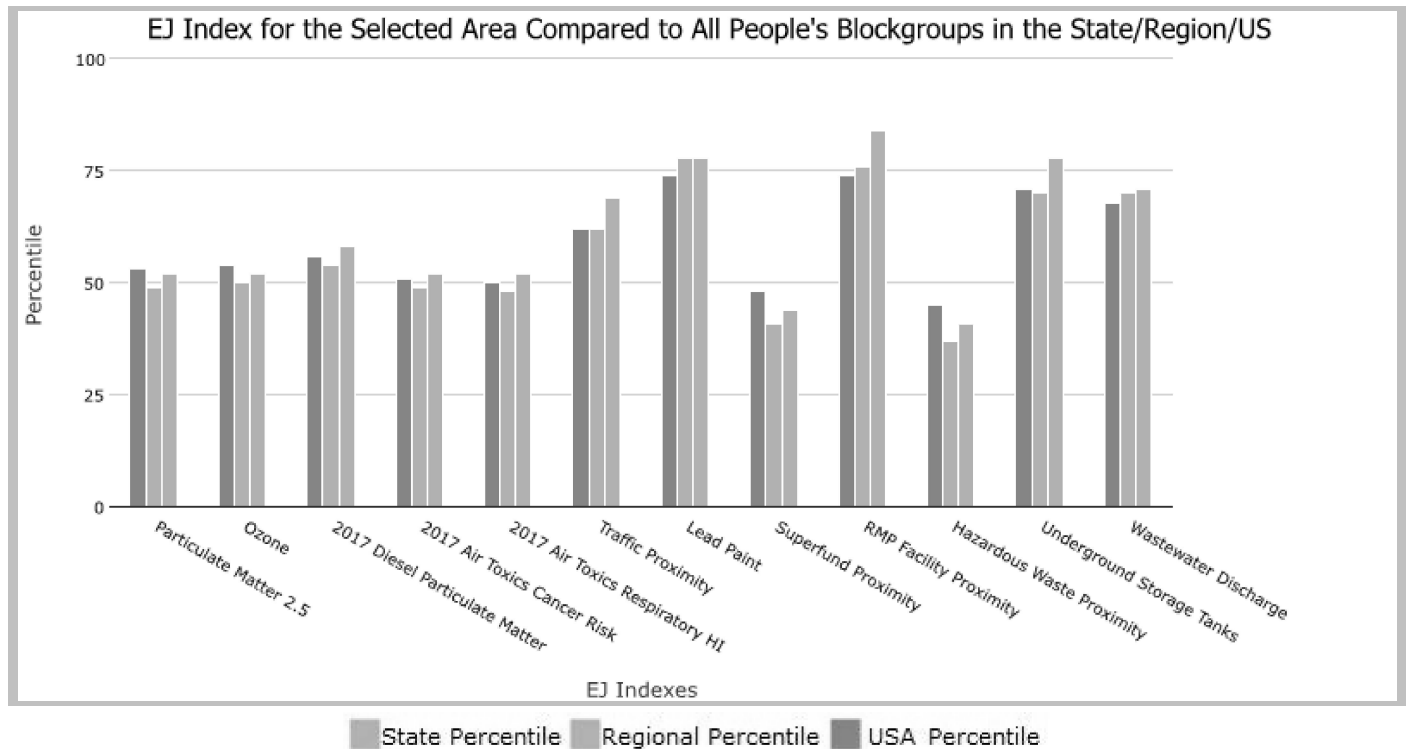
10 miles Ring Centered at 31.296228,-85.466638, ALABAMA, EPA Region 4

Approximate Population: 92,512

Input Area (sq. miles): 314.03

Michelin - Dothan

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
Environmental Justice Indexes			
EJ Index for Particulate Matter 2.5	52	49	53
EJ Index for Ozone	52	50	54
EJ Index for 2017 Diesel Particulate Matter*	58	54	56
EJ Index for 2017 Air Toxics Cancer Risk*	52	49	51
EJ Index for 2017 Air Toxics Respiratory HI*	52	48	50
EJ Index for Traffic Proximity	69	62	62
EJ Index for Lead Paint	78	78	74
EJ Index for Superfund Proximity	44	41	48
EJ Index for RMP Facility Proximity	84	76	74
EJ Index for Hazardous Waste Proximity	41	37	45
EJ Index for Underground Storage Tanks	78	70	71
EJ Index for Wastewater Discharge	71	70	68



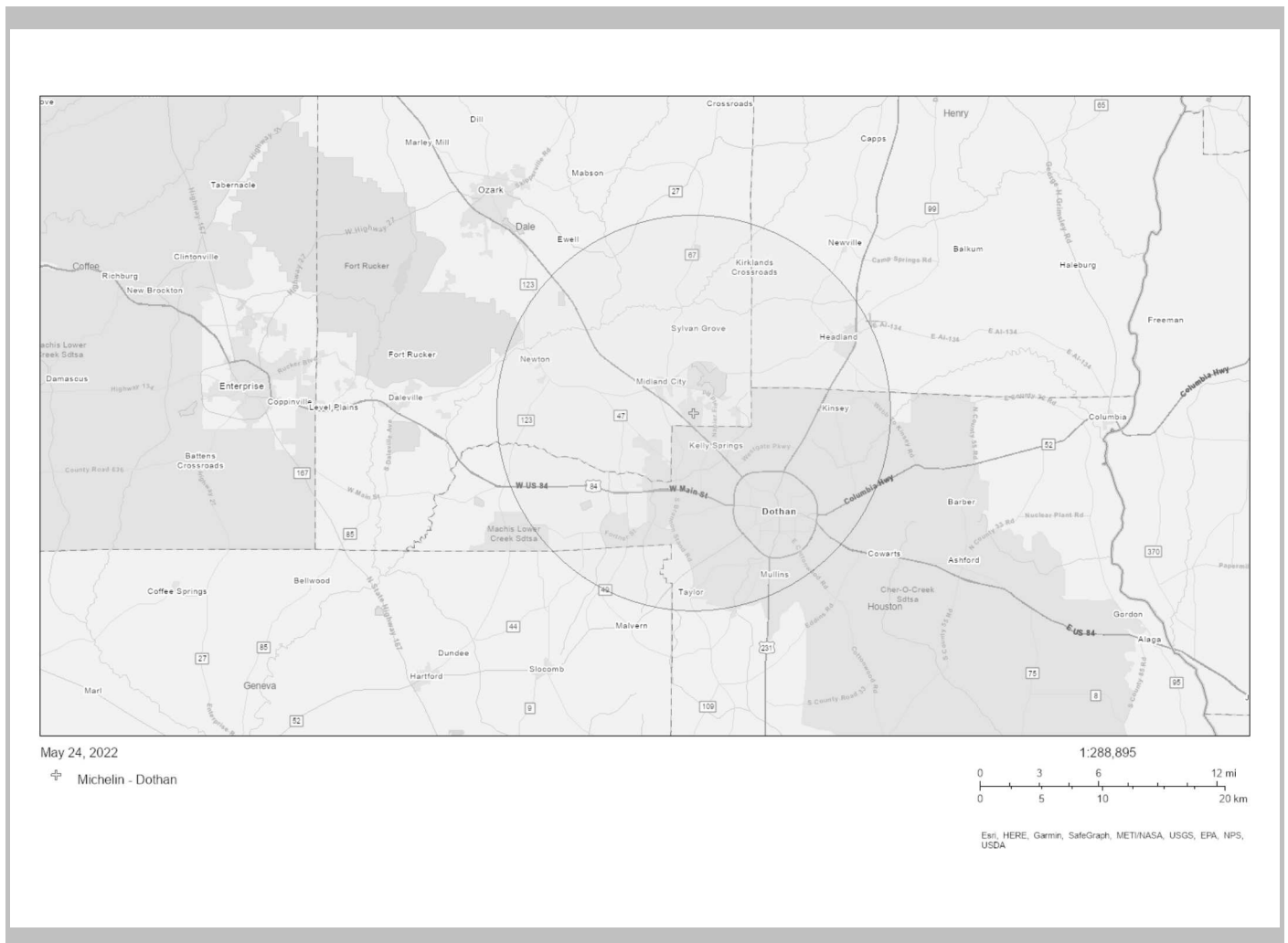
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10 miles Ring Centered at 31.296228,-85.466638, ALABAMA, EPA Region 4

Approximate Population: 92,512

Input Area (sq. miles): 314.03

Michelin - Dothan



Sites reporting to EPA	
Superfund NPL	1
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	5

EJScreen Report (Version 2.0)



10 miles Ring Centered at 31.296228,-85.466638, ALABAMA, EPA Region 4

Approximate Population: 92,512

Input Area (sq. miles): 314.03

Michelin - Dothan

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Pollution and Sources							
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	8.2	8.9	8	8.18	52	8.74	39
Ozone (ppb)	35	39.1	7	37.9	31	42.6	12
2017 Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	0.157	0.216	42	0.261	<50th	0.295	<50th
2017 Air Toxics Cancer Risk* (lifetime risk per million)	30	34	55	31	80-90th	29	80-90th
2017 Air Toxics Respiratory HI*	0.45	0.47	63	0.4	80-90th	0.36	80-90th
Traffic Proximity (daily traffic count/distance to road)	230	230	75	430	61	710	51
Lead Paint (% Pre-1960 Housing)	0.17	0.18	65	0.15	71	0.28	50
Superfund Proximity (site count/km distance)	0.096	0.054	87	0.083	78	0.13	65
RMP Facility Proximity (facility count/km distance)	1.2	0.41	90	0.6	84	0.75	80
Hazardous Waste Proximity (facility count/km distance)	0.47	0.83	54	0.62	67	2.2	43
Underground Storage Tanks (count/km ²)	2.9	1.7	81	3.5	69	3.9	66
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.0001	0.42	36	0.45	42	12	31
Socioeconomic Indicators							
Demographic Index	38%	36%	63	37%	58	36%	61
People of Color	37%	34%	63	39%	55	40%	54
Low Income	39%	37%	56	35%	60	31%	67
Unemployment Rate	7%	6%	66	6%	67	5%	70
Linguistically Isolated	1%	1%	73	3%	53	5%	47
Less Than High School Education	13%	14%	53	13%	59	12%	64
Under Age 5	6%	6%	59	6%	61	6%	58
Over Age 64	17%	17%	57	17%	60	16%	63

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's 2017 Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

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