

NEDO

The Goodyear Tire & Rubber Company

P.O. Box 1069
Topeka, Kansas 66601-1069

Phone (785) 295-7466
Fax (785) 295-7172

RECEIVED

November 3, 2014

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SENT CERTIFIED MAIL
7007 1490 0000 1649 7953

Rasha Allen
Kansas Department of Health and Environment
Bureau of Air and Radiation
1000 SW Jackson, Suite 310
Topeka, Kansas 66612-1366

BUREAU OF AIR

C-12619

Rasha

RE: The Goodyear Tire & Rubber Co
Topeka Plant (Source ID #: 1770007)
Prevention of Significant Deterioration (PSD) Construction Permit Modification Request

Dear Ms. Allen:

The Goodyear Tire & Rubber Co (Goodyear) is submitting this letter to request a modification to the March 28, 2003 Prevention of Significant Deterioration (PSD) construction permit issued by the Kansas Department of Health and Environment (KDHE) for the Topeka, Kansas facility. The 2003 PSD construction permit was a result of a consent agreement Goodyear entered with the KDHE in 2000. The PSD permit allows the Topeka facility to use coupling agent in the mixing and curing operations provided that VOC emissions resulting from the use of coupling agent in these processes does not exceed 440 tons in any consecutive 12-month period.¹

By submission of this modification request, Goodyear is proposing to remove Condition 2 under the Permit Conditions section of the 2003 PSD construction permit which requires the Topeka facility to install an ozone monitor at the site if VOC emissions resulting from the use of coupling agent in the mixing and curing processes exceeds 100 tons per year in any consecutive 12-month period. Specifically, Condition 2 states, "If the VOC emissions from the mixing and curing equipment generated by the use of the coupling agent exceed 100 tons in any consecutive 12 month period, Goodyear shall comply with ambient air analysis requirements at 40 CFR 52.21(m)."

Condition 2 under the Permit Conditions section of the 2003 PSD construction permit was not a condition in the consent decree issued by the KDHE. Rather, this condition originated from the post-construction monitoring requirement found in 40 CFR 52.21(m)(2). 40 CFR 52.21(m)(2) requires the owner of a major source or major modification to conduct ambient monitoring after construction of the stationary source or modification as the Administrator determines it necessary to determine the effect emissions from the stationary source or modification may have, or are having, on air quality in the area. In lieu of immediate post-construction monitoring, the KDHE

¹ The permit does not specifically list which mixers are included in the 440 ton per year limit. The KDHE has advised, however, that their intent at the time of permit issuance was to include only those mixers which were taken into account in the application when deriving the 440 ton per year limit. This would include #1 Mixer through #11 Mixer (i.e. EU-BB01 through EU-BB11, respectively). Note, EU-MX01 has since replaced EU-BB01 per the October 17, 2011 construction approval as revised on June 16, 2014.

established the 100 ton per year monitoring threshold. The primary driver for the requirement to install and maintain a site specific ozone monitor was that there were no ozone monitors within close proximity to the Topeka facility at that time. At the time of permit issuance the closest ozone monitor was the Wyandotte County station located in Kansas City, Kansas, which is approximately 55 miles east of the Topeka facility. Since issuance of the 2003 PSD permit, however, an ozone monitor was installed in Topeka, Kansas. The monitor is currently located at 2501 Randolph Avenue, which is less than 6 miles southwest of the Topeka facility. Given the close proximity of the existing Topeka monitor to Goodyear Topeka, the data obtained from the ozone monitor at 2501 Randolph Avenue is expected to be representative of the air quality at the Topeka facility.

The Topeka facility has never exceeded the 100 ton per year monitoring threshold. In fact, Goodyear Topeka has consistently emitted between 70 and 80 tons VOC per year from the mixing and curing processes since issuance of the 2003 PSD, which is well below the 100 ton per year monitoring threshold. Since a representative air quality monitor is now available for the Topeka facility, however, Goodyear believes Condition 2 under the Permit Conditions section of the 2003 PSD construction permit is no longer needed. Tom Gross, Air Monitoring and Planning Chief at the KDHE, agreed with Goodyear's assessment during a February 10, 2014 meeting between the KDHE, Goodyear, and Trinity Consultants which was held at the KDHE. Mr. Gross concurred that it is not necessary to have two monitors within such close proximity as they would both be measuring the same ambient air. For this reason, he too stated the condition in the Topeka facility's PSD permit to install and maintain an ozone monitor upon exceedance of the 100 ton per year threshold is no longer needed.

Attachment A includes a red-lined version of the 2003 PSD denoting the changes Goodyear is proposing.

If there are any questions regarding the information presented in this letter, please do not hesitate to call me at (785) 295-7466.

Sincerely,



Curt Deitz
Environmental Manager

Attachment

cc: Kristen Chrislip, Trinity Consultants
Nick Johnson, Trinity Consultants

ATTACHMENT A

RED-LINED PERMIT



K A N S A S

RODERICK L. BREMBY, SECRETARY

DEPARTMENT OF HEALTH AND ENVIRONMENT

KATHLEEN SEBELIUS, GOVERNOR

March 28, 2003

Source ID No. 1770007

Mr. Myron Hodge
Environmental Manager
The Goodyear Tire & Rubber Company
P.O. Box 1069
Topeka, Kansas 66601

Re: Air Emission Source Construction Permit (Coupling Agent Usage)

Dear Mr. Hodge:

Enclosed is the Air Emission Source Construction Permit for the usage of the coupling agent.

Please review the permit carefully because the permit obligates Goodyear to certain requirements.

As provided for in K.S.A. 2002 Supp. 65-3008b(e), an owner or operator may request a hearing within 15 days after affirmation, modification or reversal of a permit decision pursuant to subsection (b) of K.S.A. 2002 Supp. 65-3008a. In the Request for Hearing, the owner or operator shall specify the provision of this act or rule and regulation allegedly violated, the facts constituting the alleged violation and secretary's intended action. Such request must be submitted to Ms. Susan Vogel, Administrative Appeals Section, Office of the Secretary, Kansas Department of Health and Environment, Suite 590, 1000 SW Jackson, Topeka, Kansas 66612-1368. Failure to submit a timely request shall result in a waiver of the right to hearing.

Notify Ed Kalas, the Air Program Field Staff at the Shawnee County Health Agency, 1615 West 8th Street, Topeka, Kansas 66606 at (785) 368-2059 when the project begins operation so that an evaluation can be conducted.

The Source ID Number cited above should be included in all communications with KDHE in reference to this permit.

DIVISION OF ENVIRONMENT
Bureau of Air & Radiation
Air Construction Permit Section
CURTIS STATE OFFICE BUILDING, 1000 SW JACKSON ST., STE 310, TOPEKA, KS 66612-1366
Voice 785-296-1570 Fax 785-291-3953 <http://www.kdhe.state.ks.us>
Printed on Recycled Paper

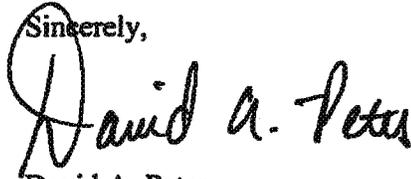
Page 2

Mr. Myron Hodge

March 28, 2003

If you have any questions about this permit, please contact me at (785) 296-1615.

Sincerely,

A handwritten signature in black ink that reads "David A. Peter". The signature is written in a cursive style with a large, looped initial "D".

David A. Peter

Engineering Associate

Air Operating Permit & Compliance Section

DAP:saw

Enclosure

c: Ed Kalas, Shawnee County Health Agency Air Program Field Staff

C-3233



K A N S A S

RODERICK L. BREMBY, SECRETARY

KATHLEEN SEBELIUS, GOVERNOR

DEPARTMENT OF HEALTH AND ENVIRONMENT

AIR EMISSION SOURCE CONSTRUCTION PERMIT

Source ID No.: 1770007

Effective Date: March 28, 2003

Source Name: The Goodyear Tire & Rubber Company

SIC Code: 3011, Tires and Inner Tubes

NAICS Code: 326211, Tire Manufacturing (except Retreading)

Source Location: 2000 Northwest Highway 24
Topeka, Kansas 66601

Mailing Address: P.O. Box 1069
Topeka, Kansas 66601

Contact Person: Mr. Myron Hodge, Environmental Manager
Telephone No. (785) 295-7466

This permit is issued pursuant to K.S.A. 65-3008 as amended; and consists of the conditions contained herein, the permit application dated May 2000, and all revisions. In the event that any condition(s), requirement(s), or limitation(s) contained herein is not in exact agreement with the permit application, or any of its revisions, the condition(s), requirement(s), and/or limitation(s) contained herein shall control.

Description of Activity Subject to Air Pollution Control Regulations

The Goodyear Tire & Rubber Company operates a tire manufacturing plant in Topeka, Kansas. Goodyear Topeka currently manufactures tires for trucks and off the road equipment, primarily earth

movers. Goodyear has modified the existing plant by introducing silica and coupling agent in the rubber formulation of certain compounds. The introduction of silica and coupling agent improves performance characteristics of tires by reducing rolling resistance, increasing tread life, and improving stopping traction. When silica reacts with the coupling agent at mixing temperatures, ethanol (a volatile organic compound) is formed and emitted. The potential-to-emit of ethanol from the introduction of silica and coupling agent is greater than 40 tons per year.

The Coupling Agent Project constitutes a major modification under Prevention of Significant Deterioration (PSD) [40 CFR 52.21, incorporated at K.A.R. 28-19-17]. The project emissions increase is significant for volatile organic compound (VOC) emissions. The Coupling Agent Project will be subject to Best Available Control Technology (BACT) requirements for VOC emissions.

The project is subject to the provisions of K.A.R. 28-19-300 (construction permits and approvals; applicability) because the potential-to-emit of VOCs from the project is greater than 40 tons per year.

Significant Applicable Air Regulations

The project, as proposed, is subject to Kansas Administrative Regulations relating to air pollution control. The following air quality regulations were determined to be applicable to this source:

1. K.A.R. 28-19-17 Prevention of Significant Deterioration of Air Quality.
2. K.A.R. 28-19-650(a)(3) Emissions Opacity Limits

Air Emission Unit Technical Specifications

The following equipment or equivalent is approved:

1. The use of a coupling agent in the manufacture of rubber tires.

Air Emissions Estimates from the Proposed Activity

Pollutant	Uncontrolled Net Increase in Emissions (tons/year)	BACT-Controlled Net Increase in Emissions (tons/year)
Volatile Organic Compounds (VOC)	440	440

Air Emission Limitations

K.A.R. 28-19-650(a)(3): Opacity of visible emissions limited to 20%

Permit Conditions

1. The owner or operator shall limit the amount of VOCs emitted from the mixing and curing operations generated from the use a coupling agent to less than 440 tons in each consecutive 12-month period calculated and updated monthly. Compliance with this permit condition shall be demonstrated by maintaining records of the total monthly use of silane agent in the mixing area, the amount of silane agent added to the rubber compounds actually cured, and the monthly VOC emissions.
2. ~~If the VOC emissions from the mixing and curing equipment generated by the use of the coupling agent exceed 100 tons in any consecutive 12-month period, Goodyear shall comply with ambient air analysis requirements at 40 CFR 52.21(m).~~

Recordkeeping

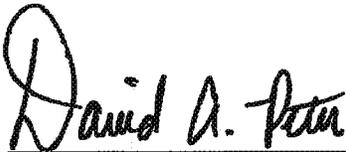
1. Records of emissions of VOCs generated from the use of the coupling agent shall be updated monthly, no later than the last day of the month following the month to which the record relates. Records of emissions of VOCs shall specify the date the record was updated and the amounts of VOCs emitted during the month. Records of the monthly usage of silane agent in the mixing area and the monthly amount of silane agent added to the rubber compounds actually cured shall also be maintained. If the appropriate records are not maintained, it will be considered an air emission violation due to the VOC emission restrictions in permit condition #1.
2. Records shall be maintained on-site for at least 2 years from the date of the record.

General Provisions

1. This document shall become void if the construction or modification has not commenced within 18 months of the effective date, or if the construction or modification is interrupted for a period of 18 months or longer.
2. A construction permit or approval must be issued by KDHE prior to commencing any construction or modification of equipment or processes which results in a potential-to-emit increase equal to or greater than the thresholds specified at K.A.R. 28-19-300.

3. Upon presentation of credentials and other documents as may be required by law, representatives of the KDHE (including authorized contractors of the KDHE) shall be allowed by the permittee to:
 - a. enter upon the premises where a regulated facility or activity is located or conducted or where records must be kept under conditions of this document;
 - b. have access to and copies of, at reasonable times, any records that must be kept under conditions this document;
 - c. inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this document; and
 - d. sample or monitor, at reasonable times, for the purposes of assuring compliance with this document or as otherwise authorized by the Secretary of the KDHE, any substances or parameters at any location.
4. The emission unit or stationary source which is the subject of this document shall be operated in compliance with all applicable requirements of the Kansas Air Quality Act and the federal Clean Air Act.
5. This document is subject to periodic review and amending as deemed necessary to fulfill the intent and purpose of the Kansas Air Quality Statutes and Regulations.
6. This document does not relieve the permittee of the obligation to obtain other approvals, permits, licenses, or documents of sanction which may be required by other federal, state, or local agencies.
7. Issuance of this document does not relieve the owner or operator of any requirement to obtain an air quality operating permit under any applicable provision of K.A.R. 28-19-500.

Permit Engineer

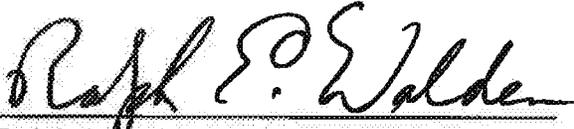


David A. Peter
Engineering Associate
Air Operating Permit & Compliance Section

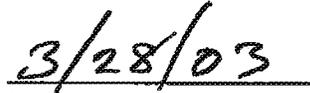


Date Signed

Issued by



Ralph E. Walden, P.E., Chief
Air Construction Permit Section
Bureau of Air and Radiation



Date Signed

DAP:saw

c: Ed Kalas, Topeka-Shawnee County Health Agency
C-3233