



April 21, 2016

Source ID No. 1770007

Mr. Curt Deitz  
Environmental Manager  
The Goodyear Tire & Rubber Company  
P.O. Box 1069  
Topeka, KS 66601

SUBJECT: Revised Prevention of Significant Deterioration (PSD) Air Emission Source Construction Permit for the Coupling Agent Project

Dear Mr. Deitz:

The Kansas Department of Health and Environment (KDHE) reviewed The Goodyear Tire & Rubber Company's (Goodyear) request to revise the PSD Air Emission Source Construction Permit issued on March 28, 2003 (as referenced by C-3233). Specifically, Goodyear requests removal of a permit condition associated with ambient air quality analysis requirements as specified under the PSD regulations. Based on considerations evaluated specific to the project and the area, the permit condition is deemed no longer appropriate and is being eliminated by this permit revision.

Enclosed is the revised Air Emission Source Construction Permit for the Coupling Aging Project at Goodyear located in Topeka, Kansas. **Please review the permit carefully as it obligates Goodyear Topeka to certain requirements.**

Currently, Goodyear Topeka operates under a Class I Operating Permit renewed on August 12, 2009. An application for renewal of the Class I Operating Permit was submitted by Goodyear Topeka in February 2014. The revision to the March 28, 2003 Construction Permit will be reflected in the upcoming renewal of the operating permit.

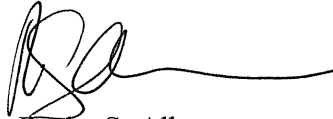
As provided for in K.S.A. 65-3008b(e), an owner or operator may request a hearing within 15 days after affirmations, modification or reversal of a permit decision pursuant to subsection (b) of K.S.A. 65-3008a. In the Request for Hearing, the owner or operator shall specify the provision of this act or rule and regulation allegedly violated, the facts constituting the alleged violation and secretary's intended action. Such a request must be submitted to: Director, Office of Administrative Hearings, 1020 S. Kansas Avenue, Topeka, Kansas 66612-1327. Failure to submit a timely request shall result in a waiver of the right to a hearing.

Include source ID number 1770007 in all communications with the KDHE regarding this facility.

Page 2  
Mr. Curt Deitz  
April 21, 2016

If you have any questions regarding this permit, please contact me at (785) 296-1693.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rasha S. Allen', with a long horizontal line extending to the right.

Rasha S. Allen  
Environmental Scientist  
Air Permitting Section

RSA:saw  
Enclosure  
c: Ward Burns, EPA Region VII  
Pat Simpson, NEDO  
C-12619 (Revision to C-3233)



## AIR EMISSION SOURCE CONSTRUCTION PERMIT

Source ID No.: 1770007

Effective Date: March 28, 2003 (Revised April 21, 2016)

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 US Highway 24  
Topeka, Kansas 66618

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

Contact Person: Mr. Curt Deitz, 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 (Goodyear) 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. As a result, an Air Emission Source Construction Permit (as referenced by C-3233) for the operational modification was issued to Goodyear Topeka on March 28, 2003.

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<sup>1</sup>]. The project emissions increase is significant for volatile organic compound (VOC) emissions (VOC is a precursor to ozone formation). The Coupling Agent Project is subject to Best Available Control Technology (BACT) requirements for VOC emissions, which is considered BACT for ozone.

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.

In November 2014, Goodyear Topeka submitted a request seeking a revision of the March 28, 2003 Construction Permit, specifically, removal of item 2 under the **Permit Conditions** section. This permit condition requires Goodyear Topeka to comply with ambient air quality analysis requirements as specified in 40 CFR 52.21(m), if VOC emissions generated from mixing and curing equipment by the use of coupling agent exceed 100 tons in any consecutive 12-month period. Specifically, Goodyear Topeka would be required, upon exceedance of the 100 ton per year threshold, to conduct ambient monitoring by installing and maintaining an ozone monitor to determine the effect emissions from the modification may have, or are having, on air quality in the area. At the time of permit issuance, this requirement was warranted and deemed necessary as there was not an ozone monitor within close proximity to Goodyear Topeka; the closest ozone monitoring station was located in Kansas City, Kansas.

During evaluation of the request, consideration was given that there is currently an ozone monitor located in Topeka, Kansas, approximately six miles southwest of the Goodyear Topeka facility. The data obtained from this monitor is sufficient and can be expected to be representative of ambient air quality data for ozone at the Goodyear Topeka facility. Therefore, the above mentioned permit condition is no longer appropriate and is being eliminated by this permit revision.

### **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<sup>2</sup> 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

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<sup>1</sup> K.A.R. 28-19-17 was amended on November 22, 2002 and shall be interpreted to refer to K.A.R. 28-19-350.

<sup>2</sup> See Footnote 1.

## Air Emissions Estimates from the Proposed Activity

<b>Pollutant</b>	<b>Uncontrolled Net Increase in Emissions (tons/year)</b>	<b>BACT-Controlled Net Increase in Emissions (tons/year)</b>
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.

## 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 any 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 Writer**

  
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Rasha S. Allen  
Air Permitting Section

4/21/16  
\_\_\_\_\_  
Date Signed

RSA:saw  
c: Pat Simpson, NEDO  
C-12619 (Revision to C-3233)