

Notice Concerning Proposed Kansas Air Quality
Construction Permit

Notice is hereby given that the Kansas Department of Health and Environment (KDHE) is soliciting comments regarding a proposed revision of an air quality construction permit. The Goodyear Tire & Rubber Company (Goodyear), located at 2000 Northwest US Highway 24, Topeka, Kansas 66618, has applied for a revision to an air quality construction permit in accordance with the provisions of K.A.R. 28-19-300. The initial permit was issued on March 28, 2003 and approved Goodyear to introduce 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.

Emissions of volatile organic compounds (VOC), a precursor to ozone formation, were evaluated during the initial permit review process, and a permit was issued in accordance with the provisions of K.A.R. 28-19-17 (amended November 22, 2002, and shall be interpreted to refer to K.A.R. 28-19-350), which adopts by reference the federal standards, procedures and requirements of 40 CFR 52.21, Prevention of Significant Deterioration (PSD) of Air Quality. These air quality regulations apply to major stationary sources and major modifications of major stationary sources located in areas designated as "attainment" or "unclassifiable" under the federal Clean Air Act. Attainment areas are areas where the air quality meets or is better than the National Ambient Air Quality Standards (NAAQS). Unclassifiable areas are areas where the air quality cannot be classified on the basis of available information as meeting or not meeting the NAAQS.

The PSD regulations require evaluation of emission reduction techniques to identify the best available control technology (BACT) for each regulated pollutant for which the emission rate exceeds the PSD significant level. The purpose of BACT is to affect the maximum degree of reduction achievable, taking into account energy, environmental, and economic impacts for each regulated pollutant under review. Estimated emissions from the project exceeded the PSD significant level for VOC.

Since issuance of the initial permit, the department reevaluated the basis for a permit condition requiring Goodyear Topeka, upon exceedance of 100 tons of VOC in any consecutive 12-month period, to install an ozone monitor. At the time of initial permit issuance, there was not an ozone monitor within close proximity to Goodyear Topeka, deeming the requirement appropriate. An ozone monitor has since been installed in Topeka, Kansas. Based on the considerations specified below, the permit condition is no longer appropriate and is being eliminated by the proposed permit revision.

An ambient air quality analysis was performed during the initial PSD permit application review, and is still representative. The proposed change to the PSD permit does not include any emissions change. After considering data specific to the project and the area, the department has concluded that the ozone monitor located in Topeka, Kansas, approximately six miles southwest of the Goodyear Topeka facility, is representative of ambient air quality data for ozone at the Goodyear Topeka facility. The project will not cause or significantly contribute to air pollution in violation of any NAAQS. The EPA has not established a 1-hour Class II maximum allowable increment for VOC or ozone. Therefore, no calculation of the potential consumption of such increment is possible.

No adverse impacts on soils and vegetation in the area are expected, since there is no proposed emissions change. Any federal land manager who has reason to believe they may have a class I area adversely impacted by the emissions from the project has the opportunity to present the KDHE with a demonstration of the adverse impact on the air quality-related values of the federal class I area during the comment period.

A public comment period has been established to allow citizens the opportunity to express any concerns they may have regarding the proposed permitting action. The public comment period is to begin on Thursday, March 17, 2016 and will end on Monday, April 18, 2016 at noon. During this comment period, public comments shall be accepted only on proposed revisions to the permit. All comments should be submitted in writing to Rasha S. Allen, Bureau of Air, 1000 SW Jackson, Suite 310, Topeka, KS 66612-1366.

Any member of the public may request the Department to hold a public hearing to receive comments on the proposed issuance of the draft air quality construction permit. A written request to hold a public hearing should be sent to the attention of Rasha S. Allen at the address listed above or by FAX to (785) 291-3953, and must be received by noon on Monday, April 18, 2016.

A copy of the proposed permit, permit application, all supporting documentation, and all information relied upon during the permit application review process are available for public review for a period of 30 days from the date of publication during normal business hours (8:00 AM to 5:00 PM) at the KDHE, Bureau of Air, 1000 SW Jackson, Suite 310, Topeka, KS 66612-1366. A copy of the proposed permit and all supporting documentation can also be reviewed at the KDHE Northeast District Office, 800 West 24th Street, Lawrence, KS 66046. To obtain or review the proposed permit and supporting documentation, contact Rasha S. Allen, (785) 296-1693, at the KDHE central office or the air program field staff, (785) 842-4600, at the KDHE Northeast District Office. The standard departmental cost will be assessed for any copies requested.

These same materials are available, free of charge, at the KDHE Bureau of Air website, <http://www.kdheks.gov/bar/index.html>.

Susan Mosier, MD, Secretary
Kansas Department of Health and Environment