New York State Department of Environmental Conservation
Facility DEC ID: 9146400030

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 9-1464-00030/00199
Mod 0 Effective Date: 12/02/2004 Expiration Date: 12/01/2009

Mod 1 Effective Date: 06/20/2006 Expiration Date: 12/01/2009

Permit Issued To: GOODYEAR DUNLOP TIRES NORTH AMERICA LTD
1144 EAST MARKET ST
AKRON, OH 44316-0001

Contact: DAVID A WOODRING
GOODYEAR TIRE AND RUBBER COMPANY
1144 EAST MARKET ST., D/110F
AKRON, OH 44316-0001
(330) 796-0565

Facility: GOODYEAR DUNLOP TIRES NORTH AMERICA LTD
10 SHERIDAN DR
TONAWANDA, NY 14150

Contact: MARK R CRAFT
GOODYEAR DUNLOP TIRES NA LTD
PO BOX 1109
BUFFALO, NY 14240-1109
(716) 879-8497

Description:
Minor Title V permit modification to add a new extrusion line for 2000 motorcycle tires per day with a permitted tread end cement station. The facility maintains similar operations and the applicable requirements are the same. No new conditions added. Emissions occur only on biased ply tires manufactured which is 20% of the time. Estimated Potential to emit Volatile Organic Compounds is 20 tons per year, less than the applicable deminimus for new source review.

New York State Department of Environmental Conservation
Facility DEC ID: 9146400030

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: DOUGLAS E BORSCHEL
270 MICHIGAN AVE
BUFFALO, NY 14203-2999

Authorized Signature: _____ Date: ___ / ___ / _____

Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees, and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.

New York State Department of Environmental Conservation
Facility DEC ID: 9146400030

LIST OF CONDITIONS

DEC GENERAL CONDITIONS
General Provisions
Facility Inspection by the Department
Relationship of this Permit to Other Department Orders and Determinations
Applications for Permit Renewals and Modifications
Permit Modifications, Suspensions and Revocations by the Department
Facility Level
Submission of Applications for Permit Modification or Renewal -REGION 9
HEADQUARTERS

DEC GENERAL CONDITIONS
****** General Provisions ******
For the purpose of your Title V permit, the following section contains state-only enforcable terms and conditions
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:
The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:
The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:
A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:
Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13

Item 3.1:
The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:
The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 4: Permit Modifications, Suspensions and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 4.1:
The Department reserves the right to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

a) materially false or inaccurate statements in the permit application or supporting papers;
b) failure by the permittee to comply with any terms or conditions of the permit;
c) exceeding the scope of the project as described in the permit application;
d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 9 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:
Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2999
(716) 851-7165

New York State Department of Environmental Conservation
Permit ID: 9-1464-00030/00199 Facility DEC ID: 9146400030

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: GOODYEAR DUNLOP TIRES NORTH AMERICA LTD
1144 EAST MARKET ST
AKRON, OH 44316-0001

Facility: GOODYEAR DUNLOP TIRES NORTH AMERICA LTD
10 SHERIDAN DR
TONAWANDA, NY 14150

Authorized Activity By Standard Industrial Classification Code:
3011 - TIRES AND INNER TUBES

Mod 0 Permit Effective Date: 12/02/2004 Permit Expiration Date: 12/01/2009

Mod 1 Permit Effective Date: 06/20/2006 Permit Expiration Date: 12/01/2009

LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS
Facility Level
1-1 6NYCRR 200.6: Acceptable Ambient Air Quality
1-2 6NYCRR 201-6.5(a)(7): Fees
3 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
4 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
5 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
6 6NYCRR 201-6.5(e): Compliance Certification
7 6NYCRR 202-2.1: Compliance Certification
8 6NYCRR 202-2.5: Recordkeeping requirements
1-3 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
1-4 6NYCRR 200.7: Maintenance of Equipment
1-5 6NYCRR 201-1.7: Recycling and Salvage
1-6 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
1-7 6NYCRR 201-3.2(a): Exempt Sources - Proof of Eligibility
1-8 6NYCRR 201-3.3(a): Trivial Sources - Proof of Eligibility
1-9 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
1-10 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
1-11 6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
1-12 6NYCRR 201-6.5(f)(6): Off Permit Changes
1-13 6NYCRR 202-1.1: Required Emissions Tests
1-14 6NYCRR 211.3: Visible Emissions Limited
10 40CFR 68: Accidental release provisions.
11 40CFR 82, Subpart F: Recycling and Emissions Reduction
1 6NYCRR 200.3: False statement
2 6NYCRR 201-6: Emission Unit Definition
1-15 6NYCRR 201-7: Facility Permissible Emissions
*1-16 6NYCRR 201-7: Capping Monitoring Condition
*1-17 6NYCRR 201-7: Capping Monitoring Condition
*1-18 6NYCRR 201-7: Capping Monitoring Condition
*1-19 6NYCRR 201-7: Capping Monitoring Condition
*1-20 6NYCRR 201-7: Capping Monitoring Condition
9 6NYCRR 231-2.6(a): Compliance Certification
Emission Unit Level
12 6NYCRR 201-6: Emission Point Definition By Emission Unit
13 6NYCRR 201-6: Process Definition By Emission Unit
1-21 6NYCRR 201-7: Emission Unit Permissible Emissions

EU=0-0EU01
14 6NYCRR 227-1.3: Compliance Certification

EU=0-0EU01,Proc=002
15 6NYCRR 225-1.8: Compliance Certification
16 6NYCRR 227.2(b)(1): Compliance Certification

EU=0-0EU02
17 6NYCRR 212.4(c): Compliance Certification
18 6NYCRR 212.6: Compliance Certification
19 40CFR 64: Compliance Certification
20 40CFR 64: Compliance Certification

EU=0-0EU03
21 6NYCRR 212.6: Compliance Certification

EU=0-0EU03,Proc=004,ES=0ES17
22 40CFR 60.542(a)(3), NSPS Subpart BBB: Compliance Certification
23 40CFR 60.543(d), NSPS Subpart BBB: Compliance Certification

EU=0-0EU04
24 6NYCRR 212.6: Compliance Certification

EU=0-0EU05
25 6NYCRR 212.6: Compliance Certification
26 40CFR 60.542(a)(5)(i), NSPS Subpart BBB: Compliance Certification
27 40CFR 60.543(b)(4), NSPS Subpart BBB: Compliance Certification
28 40CFR 60.546(f), NSPS Subpart BBB: Compliance Certification
29 40CFR 60.546(j), NSPS Subpart BBB: Compliance Certification

EU=0-0EU06
30 6NYCRR 212.4(c): Compliance Certification
31 6NYCRR 212.6: Compliance Certification

EU=0-0EU06,Proc=015
32 6NYCRR 212.3(b): Compliance Certification
33 6NYCRR 212.4: Compliance Certification

EU=0-0EU07
34 6NYCRR 212.6: Compliance Certification

EU=0-0EU08
35 6NYCRR 212.6: Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS
Facility Level
36 ECL 19-0301: Contaminant List
37 6NYCRR 201-1.4: Unavoidable noncompliance and violations
44 6NYCRR 211.2: Air pollution prohibited
Emission Unit Level

EU=0-0EU01,Proc=002

46 6NYCRR 225-1.2(a)(2): Compliance Demonstration

47 6NYCRR 227-1.2(a)(2): Compliance Demonstration

NOTE: * preceding the condition number indicates capping.

FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

Item A: Emergency Defense - 6NYCRR Part 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 201-1.10(b)
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to

Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: **Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)**
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: **Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)**
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: **Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: **Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: **Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR Part 201-6.5(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in

order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)

This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the

Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit

is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: **Permit Exclusion - ECL 19-0305**
The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: **Federally Enforceable Requirements - 40 CFR 70.6(b)**
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

Condition 1-1: **Acceptable Ambient Air Quality**
Effective between the dates of 06/20/2006 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 200.6

Item 1-1.1:
Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit

any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Condition 1-2: Fees
Effective between the dates of 06/20/2006 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(7)

Item 1-2.1:
The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

Condition 3: Recordkeeping and reporting of compliance monitoring
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-6.5(c)

Item 3.1:
The following information must be included in any required compliance monitoring records and reports:

(i) The date, place, and time of sampling or measurements;

(ii) The date(s) analyses were performed;

(iii)The company or entity that performed the analyses;

(iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;

(v) The results of such analyses including quality assurance data where required; and

(vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

Condition 4: Monitoring, Related Recordkeeping, and Reporting Requirements.
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(2)

Item 4.1:
Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable

regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 5: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(3)(ii)

Item 5.1:
The Compliance Certification activity will be performed for the Facility.

Item 5.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

(1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-6.5(e)

Item 6.1:
The Compliance Certification activity will be performed for the Facility.

Item 6.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Requirements for compliance certifications with terms and conditions contained in this facility permit include the

following:

i. Compliance certifications shall contain:
- the identification of each term or condition of the permit that is the basis of the certification;
- the compliance status;
- whether compliance was continuous or intermittent;
- the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
- such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions; and
- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

USEPA Region 2

Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

270 Michigan Avenue
Buffalo, NY 14203-2999

The address for the BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 7.1:
The Compliance Certification activity will be performed for the Facility.

Item 7.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due by April 15th for previous calendar year

Condition 8: Recordkeeping requirements
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 8.1:
(a) The following records shall be maintained for at least five years:

(1) a copy of each emission statement submitted to the department; and

(2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 1-3: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 06/20/2006 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 215

Item 1-3.1:
No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, refuse, rubbish for salvage, or rubbish generated by industrial or commercial activities.

MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 1-4: Maintenance of Equipment
Effective between the dates of 06/20/2006 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 200.7

Item 1-4.1:
Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Condition 1-5: Recycling and Salvage
Effective between the dates of 06/20/2006 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 1-5.1:
Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 1-6: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 06/20/2006 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 1-6.1:
No person shall remove, handle or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Condition 1-7: Exempt Sources - Proof of Eligibility
Effective between the dates of 06/20/2006 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-3.2(a)

Item 1-7.1:
The owner and/or operator of an emission source or unit that is eligible to be exempt may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Condition 1-8: Trivial Sources - Proof of Eligibility
Effective between the dates of 06/20/2006 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-3.3(a)

Item 1-8.1:
The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Condition 1-9: Standard Requirement - Provide Information
Effective between the dates of 06/20/2006 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(4)

Item 1-9.1:
The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 1-10: General Condition - Right to Inspect
Effective between the dates of 06/20/2006 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(8)

Item 1-10.1:
The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 1-11: Standard Requirements - Progress Reports
Effective between the dates of 06/20/2006 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-6.5(d)(5)

Item 1-11.1:
Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

(i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any

preventive or corrective measures adopted.

Condition 1-12: Off Permit Changes
Effective between the dates of 06/20/2006 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-6.5(f)(6)

Item 1-12.1:
No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

Condition 1-13: Required Emissions Tests
Effective between the dates of 06/20/2006 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 1-13.1:
For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

Condition 1-14: Visible Emissions Limited
Effective between the dates of 06/20/2006 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 211.3

Item 1-14.1:
Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material

having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 10: Accidental release provisions.
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 40CFR 68

Item 10.1:
If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;

b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:

1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,

2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

Condition 11: Recycling and Emissions Reduction
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 11.1:
The permittee shall comply with all applicable provisions of 40 CFR Part 82.

The following conditions are subject to annual compliance certification requirements for Title V permits only.

Condition 1: False statement
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 200.3

Item 1.1:
No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

Condition 2: Emission Unit Definition
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-6

Item 2.1(From Mod 1):
The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-0EU03
Emission Unit Description:
Tread extrusion is performed to combine several types of previously mixed rubber compounds. The extruder consists of a power driven screw within a stationary cylinder. A die is attached to the head of the screw to produce the desired shape or cross section of the extruded rubber. Extrusion can be performed with both warm or cold rubber feed. The extruder is jacketed to maintain the desired operating temperature.

Building(s): 02
08
10

Item 2.2(From Mod 0):
The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-0EU01
Emission Unit Description:
Steam is produced by a combination of five (5) boilers that are fired by either natural gas (P001) or #6 fuel oil (P002). Boilers number one (1) and two (2) exhaust through emission point 00001. These built-up boilers, manufactured by Babcock & Wilcox, are rated at 59.00 mmbtu/hr each. Boilers number five (5) and six (6) exhaust through emission point 00003. These built-up boilers, manufactured by Babcock & Wilcox, are rated at 60.00 mmbtu/hr each. Boiler number seven (7) exhausts through emission point 00004. This package boiler, manufactured by Cleaver Brooks, is rated at 29.30 mmbtu/hr.

Building(s): 22

Item 2.3(From Mod 0):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-0EU02

Emission Unit Description:

Raw materials handling and mixing. Rubber is mixed in either "base" or "finish" banbury mixers. Base mixers take natural and synthetic rubber and combine them with carbon black, pigments and oils to produce a rubber "stock" that is further used in other processes to form the various components that are used to "build" a tire. A powered fan is used to pull dust and fumes (mainly VOC's) off of the mixer and through a dust collector. Once the rubber "stock" is mixed it is rolled into a continuous sheet which is sent to a soap/water dip tank. This soap solution coats the rubber sheet so that it does not stick to itself. A hood over the dip tank exhausts through an uncontrolled emission point. From the soap tank the rubber "stock" is sent to a conveyor where ambient room air is blown across the sheet to dry the water and soap solution off of the rubber "stock" before it is wig-wagged onto a pallet. Finish mixers take rubber "stock" that has already passed through the base mixers and add various additives such as accelerators, zinc oxides, retarders, antioxidants and softeners to produce specific types of rubber used to "build" a tire.
Banbury No. 6 has changed from a four wing to a six wing rotor. This change may increase the rubber production capacity of this banbury mixer by as much as 15%. The facility output is limited by the number of available tire presses to process rubber produced in the banbury mixers and therefore this change should not be considered "debottlenecking". Potential increase in VOC emissions due to this change is 5 tons per year, most of which will be due to export of additional mixed rubber to other Goodyear plants.

Organo-silane coupling agents are added to some of the rubber mixed in the banbury mixers. The purpose of the organo-silane coupling agent is to bond the rubbers, silicas, and carbon black and assist in cross-linking for vulcanization of the tire. Ethanol is evolved during the reaction of silica, rubber and other compounds in the rubber mixture. The rate of ethanol evolution is dependent on several factors, including the concentrations of silica and organo-silane in the mixture, the mixing temperature, the processing time, and the moisture content of the silica. There are no current plans to apply coupling agents to all rubber mixed at the plant. Additional VOC

emissions from adding the coupling agent to the mix has been less than 5 tons per year.

Also included in this emission unit is a refiner/warm up mill ventilation system, (emission source ES15- emission point 01-55) The # 9 banbury powder dump stations vent to a separate control system prior to manifolding to a common stack. Both sources are subject to the existing monitoring conditions in the title V permit under 6 NYCRR 212.6

Building(s): 01

Item 2.4(From Mod 0):
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 0-0EU04
Emission Unit Description:

The calendering process is used to bond a continuous textile or numerous steel wires to one (1) or two (2) layers of rubber for use in the tire building process. The continuous textile product, or the numerous steel wires, pass through a series of rollers which one (1) or two (2) rubber strips also pass through. Under pressure and elevated temperatures induced by the rollers, the rubber is bonded to the textile product or steel wires. The nip of the rollers can be adjusted to vary the thickness of the calendered product. The rubberized fabric/steel wires are then cooled and cut to the proper dimension.

Building(s): 02
04

Item 2.5(From Mod 0):
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 0-0EU05
Emission Unit Description:

The various components of a tire (bead, sidewall and tread) are manually assembled. The green tire is then sprayed with a release agent to aide in the molding/curing process. The green tire is loaded into an isostatic press that forms and vulcanizes the green tire. The tire is pressed and vulcanized by the same operation. With permit modification # 1, a new south O/E Green Tire Spray Booth will be installed and identified as emission point 14-07, emission source ES32. The applicable regulations are the same as those for the existing booths listed in the original title V permit.

Building(s): 10
11
14

Item 2.6(From Mod 0):
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 0-0EU06
Emission Unit Description:
Tires are tested for uniformity prior to shipment. During this process, excess rubber is sometimes mechanically ground off the tire to bring it into permissible specifications.
Included in this emission unit, by the permit modification #1, is a new tire repair station for ATV tires (Emission Point 10-07). The tire repair stations will be subject to the same particulate and opacity standards as the rest of the sources identified in this emission unit.

Building(s): 08
10
12
13
14A

Item 2.7(From Mod 0):
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 0-0EU07
Emission Unit Description:
Tires are tested for QA/QC purposes. This involves cutting up samples of tires for analytical testing and inspection.

Building(s): 06
10

Item 2.8(From Mod 0):
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 0-0EU08
Emission Unit Description:
Rubber ply (synthetic fabric i.e. nylon, polyester, etc. covered on both sides with rubber stock) is directed through a field of high energy radiation which pre-cures the rubber. This electron processing system (known as ebr unit) is similar to a microwave in that the high energy is produced by high voltage DC, accelerated and directed at

the rubber ply. This high voltage electric energy produces ozone which will be exhausted by a powered fan without any control equipment. Past experience and manufactures data indicate that up to 0.5 pounds of ozone can be generated per hour of operation.

Building(s): 04

Condition 1-15: Facility Permissible Emissions
Effective between the dates of 06/20/2006 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-7

Item 1-15.1:
The sum of emissions from the emission units specified in this permit shall not equal or exceed the following
Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 000064-17-5 (From Mod 1) PTE: 78,000 pounds per year
Name: ETHYL ALCOHOL (ETHANOL)

CAS No: 0NY100-00-0 (From Mod 1) PTE: 49,800 pounds per year
Name: HAP

CAS No: 0NY210-00-0 (From Mod 1) PTE: 198,000 pounds per year
Name: OXIDES OF NITROGEN

CAS No: 0NY998-00-0 (From Mod 1) PTE: 85,000 pounds per year
Name: VOC

Condition 1-16: Capping Monitoring Condition
Effective between the dates of 06/20/2006 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-7

Item 1-16.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 231-2

Item 1-16.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-16.3:
The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 1-16.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-16.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-16.6:
The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 1-16.7:
Compliance Certification shall include the following monitoring:

Capping: Yes
Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
VOC

Non-stack Fugitive Emissions from Solvent Usage

Fugitive emission reduction credits are documented in the Malcolm Purine 9/95 report from sources such as label cementing, cold feed extruder, tire building and intermediate losses from storage, transfer and miscellaneous minor uses. The reductions are due to process and environmental changes. Dunlop performed a detailed evaluation of emissions in 1993 and used 1993 tire production records as a base year. It is assumed that the amount of solvent used per year is directly proportional to the amount of tires produced, an index to 1993 is used to establish emissions for years other than

1993. This is summarized in Table 3-3 of the report. The main reasons for the substantial decrease in fugitive solvent emissions from 1991 to the present are:

The installation of air conditioning in the tire building area provides the proper temperature and humidity conditions needed to keep the rubber surfaces naturally tacky and virtually eliminated the use of manually applied solvent during tire production.

Discontinuing the production of bias passenger and truck tires in September 1992. This primarily affected solvent use in the truck tire building area, since bias truck tires required more solvent than the radial tires that replaced them. This was due to the lack of advanced technology now used in the production of radial truck tires which substantially increased the inherent tackiness of the tire compounds used and has drastically reduced the use of manually applied solvent to aid in the tire building process.

Changing solvents from rubber solvent to the less volatile heptane reduced remaining solvent usage.

Baseline Fugitive emissions average = 194.2 tpy for 1989 and 1990
fugitive VOC emission limit = 142.5 tpy
Total Fugitive ERC credits = 51.7 tpy say 52 tpy

In order to maintain these credits the Permittee accepts a facility permit condition which will require continuous verification of plant solvent usage.

Fugitive VOC Facility Permit Conditions

1. The Permittee is limited to 142.5 tpy of fugitive VOC emissions and will track fugitive emissions to demonstrate compliance. The Permittee will submit semi annual reports which contain facility wide VOC purchase and disposal records, VOC content, documentation of the amounts used at point sources and the difference attributed to fugitive emissions. In addition, the Permittee must compute annual fugitive VOC emissions using a rolling 12-month period. The consumption records shall be based on verifiable data

such as storage/transfer volume records to different stations in the plant. The Permittee shall maintain purchase orders and/or invoices of the VOC containing material to confirm the general accuracy of the records. These records shall be kept on site for a minimum of 5 years. This information shall be made available to the Department upon request.

2. Any noncompliance with the 142.5 tpy fugitive VOC emission limit shall be reported to the department within 30 days of occurrence. Noncompliance constitutes a violation and is grounds for enforcement action; for ERC certification termination; or for denial of facility permit renewal applications.

3. All submittals to the department shall be certified as to the truth, completeness, and accuracy of all information recorded and reported.

4. The above permit conditions do not preclude the Permittee from complying with all other applicable state and federal regulations.

Parameter Monitored: VOC CONTENT
Upper Permit Limit: 142.5 tons per year
Reference Test Method: EPA Methods
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 1-17: Capping Monitoring Condition
Effective between the dates of 06/20/2006 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-7

Item 1-17.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 201-6

Item 1-17.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-17.3:
The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 1-17.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-17.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-17.6:
The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 1-17.7:
Compliance Certification shall include the following monitoring:

Capping: Yes
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
GoodYear Dunlop Tires North America (GDTNA) will limit the annual potential to emit Hazardous Air Pollutants, (HAP'S) from the facility to 10 tons single/ 25 tons total per year. GDTNA will maintain records at the facility on a monthly basis, which verify the facility's annual actual HAP emissions. These records will be kept in a 12 month rolling average format. GDTNA will report to the Department any exceedance of the annual potential to emit conditions within 30 days after the exceedance. Individual emission of HAP such as naphthalene are limited to 9.9 tons per year each.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: RAW MATERIAL
Parameter Monitored: NAPHTHALENE
Upper Permit Limit: 9.9 tons per year
Reference Test Method: EPA Methods
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 1-18: Capping Monitoring Condition
Effective between the dates of 06/20/2006 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-7

Item 1-18.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 201-6

Item 1-18.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-18.3:
The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 1-18.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-18.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-18.6:
The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 1-18.7:
Compliance Certification shall include the following monitoring:

Capping: Yes
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
GoodYear Dunlop Tires North America (GDTNA) will limit the annual potential to emit Hazardous Air Pollutants, (HAP'S) from the facility to 10 tons single/ 25 tons total per year. GDTNA will maintain records at the facility on a monthly basis, which verify the facility's annual actual HAP emissions. These records will be kept in a 12 month rolling average format. GDTNA will report to the Department any exceedance of the annual potential to emit conditions within 30 days after the exceedance.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: RAW MATERIAL
Parameter Monitored: HAP
Upper Permit Limit: 24.9 tons per year
Reference Test Method: EPA Methods
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 1-19: Capping Monitoring Condition
Effective between the dates of 06/20/2006 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-7

Item 1-19.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 231-2.2

Item 1-19.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms,

conditions and standards in this permit.

Item 1-19.3:
The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 1-19.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-19.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-19.6:
The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 000064-17-5 ETHYL ALCOHOL (ETHANOL)

Item 1-19.7:
Compliance Certification shall include the following monitoring:

Capping: Yes
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
Following is a "cap" for ethanol emissions at the facility level permitted under the title V modification number 2.

Organo-silane coupling agents will be added to additional amount of rubber mixed in the banbury mixers over the amount mixed reported in Mod 1. The purpose of the organo-silane coupling agent is to bond the rubbers, silicas, and carbon black and assist in cross-linking for vulcanization of the tire. Ethanol is evolved during the reaction of silica, rubber, and other compounds in the rubber mixture. Approximately four(4) moles of ethanol are evolved per mole of organo-silane coupling agent. Four moles are equivalent to 20.5 % by weight of the

organo-silane coupling agent. The four mole determination has been established as the theoretical upper limit of ethanol evolution. The general assumptions for relating molar emission rate to batch drop temperature are shown below:

Drop Temperature	Mixing Moles	Curing Moles
<300-310 degrees F	1	3
320-340 degrees F	2	2
> 345 degrees F	3	1

Mixing emissions are not necessarily in proportion to curing emissions as the potential exists to export organo-silane containing rubber compounds for curing at other facilities. Likewise, curing emissions are not necessarily in proportion to mixing emissions as the potential exists to import and cure organo-silane containing rubber compounds mixed at other facilities.

In order to avoid NSR applicability and additional RACT controls, GDTNA Tonawanda will implement a facility-wide ethanol cap of thirty-nine(39) tons per year from the use of organo-silane coupling agents. By implementing a facility-wide cap it is not necessary to utilize a cap emissions for either the mixing(EU02) or curing(EU05) areas. The facility wide cap of 39 tons per year ethanol will be less than the RACT toleration level of one hundred and sixty five (165) tons per year.

In order to document compliance with 6NYCRR part 212.10 RACT the facility will track and calculate monthly ethanol emissions from EU 02 Materials Handling and Mixing and EU05 Tire Building and Curing. Cumulatively, total ethanol emissions will be tracked on a twelve(12) month rolling average basis.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: RAW MATERIAL
Parameter Monitored: ETHYL ALCOHOL (ETHANOL)
Upper Permit Limit: 39 tons per year
Reference Test Method: 40 CFR 60 Method 25
Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 1-20: Capping Monitoring Condition
Effective between the dates of 06/20/2006 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-7

Item 1-20.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 227-2.3

Item 1-20.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-20.3:
The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 1-20.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-20.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-20.6:
The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 1-20.7:

Compliance Certification shall include the following monitoring:

Capping: Yes
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:

Dunlop Tire Corp. operates 5 existing natural gas and # 6 oil fired stationary combustion installations as well as a few insignificant sources which contribute to a facility potential to exceed 100 tons per year of Nitrogen Oxide (NOx) emissions. New York State Code of Rules and Regulations part 227-2 requires that facilities with the potential to exceed 100 tons per year (tpy) of NOx emissions must install Reasonable Available Control Technology (RACT) or limit emissions below the threshold.

Dunlop has proposed to manage fuel usage and perform fuel switching to limit emissions of NOx from the facility to less than 100 tpy. This will be accomplished by monitoring fuel usage and calculating NOx emissions using emission factors to determine a rolling twelve month average. Detailed in a permit letter dated November 29,1995, are State and Federally enforceable permit conditions for the operation of the following boilers as follows:

Emission Point	Unit	Manufacturer	Heat Input-mmbtu/hr	
00001	A	Babcock&Wilcox	59.0	start-up date 8/59
00001	B	"	"	"
00003	A	"	60.0	start-up date 8/57
00003	B	"	"	"
00004		Cleaver Brooks	29.3	start-up date 12/84

Operating Permit Conditions:

1. Track actual fuel usage on a monthly basis, by metering natural gas and #6 fuel oil used by the boilers and all other fuel burning equipment at the facility.

2. Obtain monthly statements from the fuel oil supplier as

to the percent sulfur and nitrogen in the oil purchased. The nitrogen in oil test will be based on one of the following methods: ASTM D-3228-96, D4629-96, or D5291-96.

3. Calculate NOX emission based on the following AP-42 equation, except the NOx emissions from oil will be based on figure 2 of New York State's Air Guide-32.

FUEL OIL
-NOx= 20.54+104.39xN%=lbs of NOx/1000 gallons of oil burned
%Nitrogen determined by fuel supplier

NATURAL GAS
-NOx=140lbs/mm cu.ft.

The acceptable reporting format is as submitted in the initial request for a cap dated 03/16/95.

4. Facility wide total emissions of NOx shall not exceed 99 tpy as determined by summing the individual monthly emissions from the combustion of natural gas and #6 oil during any
consecutive 12 month period.

5. The facility must maintain monthly NOx emission records. Semi annual reports must be submitted to this office in accordance with the time frames stated below.

6. All fuel use records and corresponding emission calculations shall be kept on site for a minimum of five years. This information shall be made available to the department upon request.

7. Any noncompliance with the 99 tpy NOx emission limit shall be reported to the department within 30 days of occurrence. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: NATURAL GAS

Parameter Monitored: OXIDES OF NITROGEN
Upper Permit Limit: 99 tons per year
Reference Test Method: EPA Methods
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 9: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 231-2.6(a)

Item 9.1:
The Compliance Certification activity will be performed for the Facility.

Item 9.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

An Emission Reduction Credits Application dated 9/12/95 documents Volatile Organic compound reductions from the shutdown of several previously permitted sources and from reductions in fugitive emissions. The Malcolm Pirnie 9/95 report contains the appropriate emission reduction quantification forms, summary of emissions for a 5-year evaluation period for each shut down emission point and an evaluation of fugitive emission reductions. Fugitive Emission reductions are certified under a 231-2.13 special condition.

Stack Emissions

01K04 - tread end cement for bias truck and passenger tires, removed from service 9/92.
02B05-02- undertread cement for bias truck and passenger tires, removed from service 9/92 02B05-03- undertread cement for bias truck tires, removed from service 1/92
02-03- undertread cement for Radial Light Truck Tires removed from service 4/91
12-05- bead dipping, removed from service 2/93

Table 2-6 in the report summarizes the baseline year, total solvent usage and average baseline year emissions

for each source. The total emission reduction credit for the above removed sources is 105 tpy. Permitting of these sources for future use will be subject to the current regulations at the time of start-up.

The technology changes that allowed for the VOC reductions are use of an extruded thin tacky rubber liner that is placed on the under side of the tread in lieu of solvent based cement. This allowed for the elimination of VOC's associated with sources 02B05-02, 02B05-03 and 02-03. A similar technology advancement replaced the solvent in bead dipping, source 12-05. A thin tacky rubber liner is wrapped around the beads instead of dipping in solvent. Bias tire production was discontinued in September of 1992. Bias tire treads were extruded with side walls as one piece. The ends of these treads were cemented at emission point 01K04. Radial tires are not extruded with side walls and therefore a smaller area of tread end is cemented. The new tread end cementing line (Emission Unit EU03, Process 004) meet the New Source Performance Standard, Subpart BBB limit of 10 grams VOC per tire cemented each month. These technology changes are proven advancements, verifiable and permanent.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

****** Emission Unit Level ******

Condition 12: Emission Point Definition By Emission Unit
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-6

Item 12.1(From Mod 1):
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0EU03

Emission Point: 00217
Height (ft.): 48 Diameter (in.): 32
Building: 02

Emission Point: 00218
Height (ft.): 48 Diameter (in.): 24
Building: 02

Emission Point: 00808
Height (ft.): 40 Diameter (in.): 20
Building: 08

Emission Point: 00809
Height (ft.): 31 Diameter (in.): 18
Building: 08

Emission Point: 00810
Height (ft.): 40 Diameter (in.): 20
Building: 08

Emission Point: 01008
Height (ft.): 40 Diameter (in.): 20
Building: 10

Emission Point: 01009
Height (ft.): 40 Diameter (in.): 18
Building: 10

Emission Point: 01010
Height (ft.): 40 Diameter (in.): 20
Building: 10

Item 12.2(From Mod 0):
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0EU01

Emission Point: 00001
Height (ft.): 31 Diameter (in.): 78
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 22

Emission Point: 00003
Height (ft.): 31 Diameter (in.): 78
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 22

Emission Point: 00004
Height (ft.): 103 Diameter (in.): 24
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 22

Item 12.3(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0EU02

Emission Point: 00125
Height (ft.): 10 Diameter (in.): 13
Building: 01

Emission Point: 00126
Height (ft.): 59 Diameter (in.): 28
Building: 01

Emission Point: 00128
Height (ft.): 45 Diameter (in.): 42
Building: 01

Emission Point: 00129
Height (ft.): 47 Diameter (in.): 26
Building: 01

Emission Point: 00132
Height (ft.): 59 Diameter (in.): 28
Building: 01

Emission Point: 00134
Height (ft.): 48 Diameter (in.): 36
Building: 01

Emission Point: 00135
Height (ft.): 47 Diameter (in.): 26
Building: 01

Emission Point: 00138
Height (ft.): 59 Diameter (in.): 32
Building: 01

Emission Point: 00140
Height (ft.): 45 Diameter (in.): 36
Building: 01

Emission Point: 00144
Height (ft.): 59 Diameter (in.): 32
Building: 01

Emission Point: 00146
Height (ft.): 45 Diameter (in.): 42
Building: 01

Emission Point: 00147
Height (ft.): 47 Diameter (in.): 26
Building: 01

Emission Point: 00151
Height (ft.): 59 Diameter (in.): 31
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 01

Emission Point: 00152
Height (ft.): 47 Diameter (in.): 36
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 01

Emission Point: 00153
Height (ft.): 58 Diameter (in.): 11
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 01

Emission Point: 00155
Height (ft.): 47 Diameter (in.): 21
Building: 01

Emission Point: 01F15
Height (ft.): 60 Diameter (in.): 28
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 01

Emission Point: 01H17
Height (ft.): 45 Diameter (in.): 24
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 01

Item 12.4(From Mod 0):
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0EU03

Emission Point: 00213
Height (ft.): 38 Diameter (in.): 24
Building: 02

Emission Point: 00214
Height (ft.): 38 Diameter (in.): 24
Building: 02

Emission Point: 00215
Height (ft.): 38 Diameter (in.): 44
Building: 02

Emission Point: 00404

Height (ft.): 34 Diameter (in.): 18
Building: 04

Emission Point: 00405
Height (ft.): 24 Diameter (in.): 10
Building: 04

Emission Point: 00406
Height (ft.): 35 Diameter (in.): 24
Building: 04

Emission Point: 00407
Height (ft.): 30 Diameter (in.): 10
Building: 04

Emission Point: 02-19
Height (ft.): 40 Diameter (in.): 15
Building: 02

Item 12.5(From Mod 0):
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0EU04

Emission Point: 00219
Height (ft.): 28 Diameter (in.): 22
Building: 02

Emission Point: 00220
Height (ft.): 22 Diameter (in.): 21
Building: 02

Emission Point: 00401
Height (ft.): 42 Diameter (in.): 12
Building: 04

Emission Point: 00402
Height (ft.): 35 Diameter (in.): 28
Building: 04

Item 12.6(From Mod 0):
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0EU05

Emission Point: 01006
Height (ft.): 38 Diameter (in.): 24

Building: 10

Emission Point: 01104
Height (ft.): 40 Diameter (in.): 24
Building: 11

Emission Point: 01105
Height (ft.): 40 Diameter (in.): 16
Building: 11

Emission Point: 01404
Height (ft.): 32 Diameter (in.): 24
Building: 14

Emission Point: 01405
Height (ft.): 30 Diameter (in.): 24
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 14

Item 12.7(From Mod 0):
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0EU06

Emission Point: 00811
Height (ft.): 41 Diameter (in.): 24
Building: 08

Emission Point: 00812
Height (ft.): 14 Diameter (in.): 17
Building: 08

Emission Point: 01004
Height (ft.): 35 Diameter (in.): 24
Building: 10

Emission Point: 01007
Height (ft.): 18 Diameter (in.): 10
Building: 10

Emission Point: 01206
Height (ft.): 18 Diameter (in.): 10
Building: 12

Emission Point: 01301
Height (ft.): 30 Diameter (in.): 8
Building: 13

Emission Point: 01307
Height (ft.): 18 Diameter (in.): 10
Building: 13

Emission Point: 01310
Height (ft.): 18 Diameter (in.): 8
Building: 13

Emission Point: 01406
Height (ft.): 30 Diameter (in.): 24
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 14A

Emission Point: 01407
Height (ft.): 30 Diameter (in.): 24
Building: 14

Emission Point: 13S02
Height (ft.): 14 Diameter (in.): 8
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 13

Emission Point: 13S04
Height (ft.): 14 Diameter (in.): 18
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 13

Emission Point: 13S05
Height (ft.): 14 Diameter (in.): 18
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 13

Emission Point: 13S06
Height (ft.): 14 Diameter (in.): 18
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 13

Emission Point: 13S07
Height (ft.): 48 Diameter (in.): 26
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 13

Item 12.8(From Mod 0):
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0EU07

Emission Point: 00614
Height (ft.): 30 Diameter (in.): 12
Building: 06

Emission Point: 01005
Height (ft.): 19 Diameter (in.): 8

Building: 10

Item 12.9(From Mod 0):
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0EU08

Emission Point: 00410
Height (ft.): 38 Diameter (in.): 24
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 04

Condition 13: Process Definition By Emission Unit
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-6

Item 13.1(From Mod 1):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU03
Process: 004 Source Classification Code: 3-08-001-13
Process Description:
Tread extruding. Extrusion is often performed to combine several types of previously mixed rubber compounds. The extruder consists of a power driven screw within a stationary cylinder. A die is attached to the head of the screw to produce the desired shape or cross section of the extruded rubber. Extrusion can be performed with both warm or cold rubber feed. The extruder is jacketed to maintain the desired operating temperatures. In this process the tread portion of the different types of tires manufactured at Dunlop tire are extruded. The extruded rubber treads are marked with a letter/number identification code. Ink is transferred to the tread surface by an offset printer and/or an inkjet printer. Treads are cut to length and the ends are sprayed with a sticky cement solution to make them tacky for the building. These treads will be used later in the tire building area.

Emission Source/Control: 0ES16 - Process

Emission Source/Control: 0ES17 - Process

Emission Source/Control: 0ES18 - Process

Item 13.2(From Mod 0):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU01
Process: 001 Source Classification Code: 1-02-006-02
Process Description:
Natural gas combustion of boilers. Steam is produced by a combination of five (5) boilers that are fired by natural gas. Boilers number (1) and (2) exhaust through emission point 00001. These built-up boilers, manufactured by Babcock & Wilcox, are rated at 59.00 mmbtu/hr each. Boilers number five (5) and six (6) exhaust through emission point 00003. These built-up boilers, manufactured by Babcock & Wilcox, are rated at 60.00 mmbtu/hr each. Boiler number seven (7) exhausts through emission point 00004. This package boiler, manufactured by Cleaver Brooks, is rated at 29.30 mmbtu/hr.

Emission Source/Control: 0ES01 - Combustion
Design Capacity: 59 million Btu per hour

Emission Source/Control: 0ES02 - Combustion
Design Capacity: 59 million Btu per hour

Emission Source/Control: 0ES03 - Combustion
Design Capacity: 60 million Btu per hour

Emission Source/Control: 0ES04 - Combustion
Design Capacity: 60 million Btu per hour

Emission Source/Control: 0ES05 - Combustion
Design Capacity: 29.3 million Btu per hour

Item 13.3(From Mod 0):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU01
Process: 002 Source Classification Code: 1-02-004-02
Process Description:
#6 oil combustion in boilers. Steam is produced by a combination of 5 boilers that are fired by #6 oil. Boilers # 1 and # 2 exhaust through E.P. # 1. These built-up boilers, manufactured by Babcock & Wilcox, are rated at 59 mmbtu/hr each. Boilers #5 and #6 exhaust through E. P. 3. These built-up boilers, manufactured by B&W are rated at 60 mmbtu/hr each. Boiler # 7 exhaust through E.P. #4. This package boiler, manufactured by Cleaver Brooks, is rated at 29.30 mmbtu/hr.

Emission Source/Control: 0ES01 - Combustion
Design Capacity: 59 million Btu per hour

Emission Source/Control: 0ES02 - Combustion
Design Capacity: 59 million Btu per hour

Emission Source/Control: 0ES03 - Combustion
Design Capacity: 60 million Btu per hour

Emission Source/Control: 0ES04 - Combustion
Design Capacity: 60 million Btu per hour

Emission Source/Control: 0ES05 - Combustion
Design Capacity: 29.3 million Btu per hour

Item 13.4(From Mod 0):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU02
Process: 003 Source Classification Code: 3-08-001-27
Process Description:
Rubber mixing department 201. Natural rubber, synthetic rubber, carbon black, oils and pigments are mixed together in 2,000 horsepower, high speed, shear type banbury mixers. Each batch produces approximately 475 pounds of rubber "stock". The mixed rubber "stock" is utilized further through the tire manufacturing process to extrude and roll various shapes and components used in the construction of tires. After mixing, the rubber "stock" is coated with a water and soap solution and is dried via fans blowing ambient air across the rubber "stock".

Emission Source/Control: 0ES15 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0ES09 - Process

Item 13.5(From Mod 0):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU03
Process: 005 Source Classification Code: 3-08-001-14
Process Description:
Sidewall extruding. Extrusion is often performed to combine several types of previously mixed rubber compounds. The extruder consists of a power driven screw within a stationary cylinder. A die is attached to the

lead of the screw to produce the desired shape or cross section of the extruded rubber. Extrusion can be performed with both warm or cold rubber feed. The extruder is jacketed to maintain the desired operating temperature. In this process the sidewall portion of the different types of tires manufactured at Dunlop tire are extruded. These sidewalls will be used later in the tire building area.

Emission Source/Control: 0ES19 - Process

Item 13.6(From Mod 0):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU03
Process: 006 Source Classification Code: 3-08-001-14
Process Description:

Profile extruding. Extrusion is often performed to combine several types of previously mixed rubber compounds. The extruder consists of a power driven screw within a stationary cylinder. A die is attached to the head of the screw to produce the desired shape or cross section of the extruded rubber. Extrusion can be performed with both warm or cold rubber feed. The extruder is jacketed to maintain the desired operating temperature. In this process the profile portion of the different types of tires manufactured at Dunlop tire are extruded. These profiles will be used later in the tire building area.

Emission Source/Control: 0ES20 - Process

Item 13.7(From Mod 0):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU03
Process: 007 Source Classification Code: 3-08-010-02
Process Description:

Inner liner extruding. Extrusion is often performed to combine several types of previously mixed rubber compounds. The extruder consists of a power driven screw within a stationary cylinder. A die is attached to the head of the screw to produce the desired shape or cross section of the extruded rubber. Extrusion can be performed with both warm or cold rubber feed. The extruder is jacketed to maintain the desired operating temperature. In this process the inner liner portion of the different types of tires manufactured at Dunlop tire are extruded. These inner liners will be used later in the tire building

area.

Emission Source/Control: 0ES21 - Process

Emission Source/Control: 0ES22 - Process

Item 13.8(From Mod 0):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU03
Process: 008 Source Classification Code: 3-08-001-06
Process Description:
Cement room department 203. Paint spray for the inside and outside of the tires are mixed in 1,000 gallon tanks and are later transferred to smaller portable tanks. Solvent and water based paint and cements are dispensed into 100 - 300 gallon portable tanks via a gasoline style dispensing nozzle.

Emission Source/Control: 0ES23 - Process

Emission Source/Control: 0ES24 - Process

Emission Source/Control: 0ES25 - Process

Item 13.9(From Mod 0):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU03
Process: P09 Source Classification Code: 3-08-001-15
Process Description:
Calendering, extrusion of sticky, thin rubber underlayment aides in adhering tread to carcass of tire during construction.

Emission Source/Control: OES26 - Process

Item 13.10(From Mod 0):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU04
Process: 009 Source Classification Code: 3-08-001-15
Process Description:
Fabric calendering department 202. As tire plies are being wound up in a fabric liner, the liner is being sucked clean of lint and dust particles which are captured by a cyclone. The fabric for making tire plies is then

coated with a thin film of rubber on both sides in the calender. The heat and vapor from this process are exhausted through a hood exhaust.

Emission Source/Control: 0ES26 - Control
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 0ES27 - Process

Item 13.11(From Mod 0):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU04
Process: 010 Source Classification Code: 3-08-001-31
Process Description:
Steel calendering department 602. Rubber stock is warmed up prior to being fed to a steel cord calendering line. Fumes from the warming mill are captured and exhausted to the atmosphere via emission point 02-19. After warming , the rubber stock is calendered (rolled between/around steel wire) to form a sheet of rubber with wire embedded within it. The fumes from the calendering process are captured and exhausted to the atmosphere via emission point 02-20.

Emission Source/Control: 0ES28 - Process

Emission Source/Control: 0ES29 - Process

Item 13.12(From Mod 0):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU05
Process: 011 Source Classification Code: 3-08-001-23
Process Description:
Tire building department. 208. The inside green truck tires and motorcycle tires are sprayed with a water-based coating. The constituents of the coating are as follows: 50 to 60 percent water, 10 to 20 percent silicone, and 20 to 30 percent mica. An estimated 5 percent of the product will be emitted to the emission points due to overspray. The resulting emissions will be vented to the atmosphere via emission point 11-04, for the bias truck tire spray booth and 11-05 for the motorcycle spray booth.

Emission Source/Control: 0ES30 - Process

Item 13.13(From Mod 0):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU05
Process: 012 Source Classification Code: 3-08-001-06
Process Description:
Tire building department 209. The inside of green atv tires are sprayed with a water-based coating. The constituents of the coating are as follows: 50 to 60 percent water, 10 to 20 percent silicone, and 20 to 30 percent mica. An estimated 5 percent of the product will be emitted to the emission point due to overspray. The resulting emissions will be vented to the atmosphere via emission point 10-06. 1day/24 hr x 3000 tires per day x 35 g/tire x 1 lb/454 g x 50% solids x 5% overspray = 0.24 lb/hr solids. 340 day s/yr x 24 hr/day x 0.24 lb/hr = 1,958.4 lb/yr solids.

Emission Source/Control: 0ES31 - Process

Item 13.14(From Mod 0):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU05
Process: 013 Source Classification Code: 3-08-001-23
Process Description:
Tire building department 233. The inside of green truck and passenger car tires are sprayed with a water-based coating. The constituents of the coating are as follows: 50 to 60 percent water, 10 to 20 percent silicone, and 20 to 30 percent mica. An estimated 5 percent of the product will be emitted to the emission points due to overspray. The resulting emissions will be vented to the atmosphere via emission point 14-04 for the light truck radial and passenger car tire spray booth and 14-05 for the original equipment tires spray booth.

Emission Source/Control: 0ES32 - Process

Item 13.15(From Mod 0):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU06
Process: 014 Source Classification Code: 3-08-005-01
Process Description:
Mtr finishing dept. 614. Cured tires are sent to finishing dept. 614 (mtr finishing) where they are tested

for uniformity. A small percentage (approx. 1%) are determined to be "out of specifications" and as such require grinding to remove rubber to bring them back into the range of acceptable tolerances for tire uniformity. Occupied in bldg 8 and 10.

Emission Source/Control: 0ES33 - Process

Emission Source/Control: 0ES34 - Process

Emission Source/Control: 0ES35 - Process

Item 13.16(From Mod 0):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU06
Process: 015 Source Classification Code: 3-08-005-01
Process Description:
Finishing dept. 237. Cured tires are sent to finishing dept. 237 where they are tested for uniformity. A small percentage (approximately 1%) are determined to be "out of specifications" and as such require grinding to remove rubber to bring them back into the range of acceptable tolerances for the uniformity. Occupied in bldg 12,13,14.

Emission Source/Control: 0ES36 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 0ES38 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 0ES39 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 0ES41 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 0ES42 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 0ES43 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 0ES45 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 0ES46 - Control

Control Type: SINGLE CYCLONE

Emission Source/Control: 0ES37 - Process

Emission Source/Control: 0ES40 - Process

Emission Source/Control: 0ES44 - Process

Emission Source/Control: 0ES47 - Process

Item 13.17(From Mod 0):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU07
Process: P07 Source Classification Code: 3-08-001-33
Process Description: Tires are tested for QA/QC purposes.

Emission Source/Control: 0ES48 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 0ES49 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: P0007 - Process

Item 13.18(From Mod 0):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU08
Process: P08 Source Classification Code: 3-08-001-26
Process Description:
Electron processing system (ERB)- rubber ply is directed through a high voltage field which partly cures the rubber. Ozone is given off the high voltage equipment which is collected and exhausted through a fan and out a stack. No control equipment.

Emission Source/Control: 00001 - Process

Condition 1-21: Emission Unit Permissible Emissions
Effective between the dates of 06/20/2006 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 201-7

Item 0-21.1:
The sum of emissions from all regulated processes specified in this permit for the emission unit cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: 0-0EU01

CAS No: 0NY210000 (From Mod 0)
Name: OXIDES OF NITROGEN
PTE(s): 22.6 pounds per hour
198,000 pounds per year

Condition 14: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 227-1.3

Item 14.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU01

Item 14.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
Dunlop will operate boilers in manner consistent with good operating & maintenance practices, thus ensuring compliance with opacity limitations. Dunlop maintains standard operating procedures for boilers (ES01, ES02, ES03, ES04, ES05) which contains procedures for maintenance and any necessary calibration annually or more frequently, if appropriate. In response to opacity concerns in 1996, Dunlop completed an action plan to diminish or eliminate smoke associated with the use of #6 oil in the boilers. Actions performed are as follows:
1. Installation of new electric motor driven jack shaft actuators on all four water tube boilers that control the air dampers. The actuators receive an electronic signal through a pcc-2000 computer system which advise when the boiler is calling for more fuel;
2. Installation of PCC-2000 computerized combustion control system to improve boiler efficiency and provide operators with real time boiler operating conditions;
3. Tuning of boilers to slow down rate of response;
4.installation of controls to reactivate the cross-over pressure reducing valve between 150 psi and 250 psi steam distribution lines to establish a loop steam system;

5. Replacement of fuel oil gun nozzles and screens;
6. Installation of closed circuit TV camera to allow boiler house supervisor and operator to monitor the stack's off gases from within the building;
7. Preventative maintenance of boilers including burners and burner cones.

The operators of the boilers are licensed boiler engineers. Dunlop also employs the services of a boiler maintenance company that regularly performs tune-up procedures on industrial/commercial boilers. The service company maintains certifications from the boiler manufacturers as authorized service providers. In addition, the operation of the 5 boilers are reviewed by representatives of Dunlop's insurance provider to comply with insurance requirements. Records of all maintenance procedures will be maintained and provided to the department upon request.
Dunlop shall not operate the boilers in a manner which creates opacity greater than 20 percent (six minute average), except for one six-minute period per hour of not more than 27 percent opacity. Daily observations of stack opacity will be performed on boilers in operation. If any visible emissions above normal are observed, the source owner or operator shall:
1) Verify that the equipment and/or control device causing the visible emissions is operating according to manufacturer's specifications or other site-specific acceptable operating conditions. If the equipment or control device is not operating properly, the Permittee shall take corrective action immediately to eliminate excess emissions.
2) Conduct an opacity test using a certified opacity reader in accordance with Method 9 (40 CFR 60 , Appendix A) if the corrective action taken in (1) does not rectify the opacity problem within 24 hours. Conduct such a test at least once each daylight shift until corrective action successfully rectifies the opacity problem or until 2 consecutive Method 9 tests over 2 periods indicate no visible emissions.
3) Report the observance of visible emissions and the substance of any corrective action, in accordance with the deviation reporting requirements in this permit.
If the opacity continues a Method 9 observation must be performed within 24 hours and results reported

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent
Reference Test Method: METHOD 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6 MINUTE AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 15: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 225-1.8

Item 15.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU01
Process: 002

Item 15.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Records of fuel quantity burned and supplier fuel sulfur analysis must be maintained for the purpose of demonstrating compliance with the limits in 6NYCRR part 225-1. Fuel Supplier monthly statements for fuel purchased and sulfur content is acceptable.

Monitoring Frequency: MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 16: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 227.2(b)(1)

Item 16.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU01

Process: 002

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 16.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
Particulate emission limit for stationary combustion installation firing oil. The owner or operator shall complete the following once per term of this permit:

1) Submit to the Department an acceptable protocol for the testing of particulate emission limit cited in this condition. The protocol shall be submitted at least 30 days in advance of the proposed test date and the Department given an opportunity to witness the test.

2) Perform a stack test, based upon the approved test protocol, to determine compliance with the particulate emission limit cited in this condition.

3) Submit an acceptable stack test report within 45 days after the stack test.

3) All records shall be maintained at the facility for a minimum of five years.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.10 pounds per million Btus
Reference Test Method: Method 5
Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 17: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 17.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU02

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 17.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Dunlop will monitor control device parameters, specifically pressure drop, as an indicator that the emission control equipment is operating properly and meeting the degree of air cleaning required under 212.9 (b) (i.e. table 2). These pieces of equipment will also be operated in accordance with good operating and maintenance practices as suggested by the manufacturer of the control equipment. Observation of pressure drop to occur weekly and records of maintenance kept on site.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 18: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 212.6

Item 18.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU02

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 18.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
Dunlop will operate emission unit EU02 sources in a manner consistent with good operating and maintenance

practices, thus ensuring compliance with opacity limit of 20% or greater during any 6 consecutive minutes from any process emission source, except for emission of uncombined water.
The Permittee shall conduct daily visual emissions inspections during daylight hours and only when the source is in operation. Visual inspections shall consist of a visual survey of each stack or process emissions point over a 2 minute period to identify if there are visible emissions. 0% opacity is normal for this equipment. If any visible emissions are observed, the source owner or operator shall:
1) Verify that the equipment and/or control device causing the visible emissions is operating according to manufacturer's specifications or other site-specific acceptable operating conditions. If the equipment or control device is not operating properly, the Permittee shall take corrective action immediately to eliminate excess emissions.
2) Conduct an opacity test using a certified opacity reader in accordance with Method 9 (40 CFR 60 , Appendix A) if the corrective action taken in (1) does not rectify the opacity problem within 24 hours. Conduct such a test once per day until corrective action successfully rectifies the opacity problem or until 2 consecutive Method 9 tests over2 periods indicate no visible emissions.
3) Report the observance of visible emissions and the substance of any corrective action, in accordance with the deviation reporting requirements in this permit.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA method 22
Monitoring Frequency: DAILY
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 19: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 40CFR 64

Item 19.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU02

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 19.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
GDTNA Tonawanda will perform daily qualitative opacity assessments for the seven sources subject to CAM requirements within emission unit EU02 (emission points 01-26, 01-44, 01-38, 01H17, 01-32, 01-51, 01-53). The observer performing the qualitative opacity assessments will be familiar with US EPA method 22 procedures. The Permittee shall conduct daily visual emissions inspections during daylight hours and only when the source is in operation. Visual inspections shall consist of a visual survey of each stack or process emissions point over a 2 minute period to identify if there are visible emissions. 0% opacity is normal for this equipment. If any visible emissions are observed, the source owner or operator shall:
1) Verify that the equipment and/or control device causing the visible emissions is operating according to manufacturer's specifications or other site-specific acceptable operating conditions. If the equipment or control device is not operating properly, the Permittee shall take corrective action immediately to eliminate excess emissions.
2) Conduct an opacity test using a certified opacity reader in accordance with Method 9 (40 CFR 60 , Appendix A) if the corrective action taken in (1) does not rectify the opacity problem within 24 hours. Conduct such a test at least once per day until corrective action successfully rectifies the opacity problem or until 2 consecutive Method 9 tests over2 periods indicate no visible emissions.
3) Report the observance of visible emissions and the substance of any corrective action, in accordance with the deviation reporting requirements in this permit.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: Method 22
Monitoring Frequency: DAILY
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 20: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 40CFR 64

Item 20.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU02

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 20.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
Several emission points in Emission unit EU02 are subject to CAM because potential emissions of particulates, prior to control, exceed the 100 tpy applicability threshold in 40 CFR part 64. The permittee will monitor pressure drop across the cartridge filter for emission points 01-26, 01-44, 01-38, 01H17, 01-32, 01-51, 01-53 on a weekly basis as an indicator that the emission control equipment is operating properly. An excursion is proposed as a pressure drop reading outside of the normal operating range of the control equipment (0.5 to 7.0 inches of water). An excursion shall trigger immediate corrective actions, including a maintenance inspection to be completed within 8 hours of the perceived exceedance. Maintenance of control equipment and calibration of differntial pressure devices shall be performed per manufacturers specifications. Records of repairs and calibrations shall be kept on site.

Report the observance of exceedance outside the normal operating range and the substance of any corrective action, in accordance with the deviation reporting requirements in this permit.

Parameter Monitored: PRESSURE CHANGE
Lower Permit Limit: 0.5 inches of water
Upper Permit Limit: 7.0 inches of water
Monitoring Frequency: WEEKLY
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 21: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 212.6

Item 21.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU03

Item 21.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Dunlop will operate emission unit EU03 in a manner consistent with good operating practices, thus ensuring compliance with opacity limit of 20% or greater during any 6 consecutive minutes from any process emission source, except for emission of uncombined water.
Emission unit eu03 is comprised of only uncontrolled emission sources. For the emission points within EU03 (02-17,08-09, 02-18, 08-10, 08-08, 04-06, 02-13, 02-14, 02-15, 04-04, 04-05, 04-07), proper operation will ensure opacity compliance.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.

Subsequent reports are due every 6 calendar month(s).

Condition 22: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 40CFR 60.542(a)(3), NSPS Subpart BBB

Item 22.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU03
Process: 004 Emission Source: 0ES17

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 22.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
For each tread end cementing operation: Discharge into the atmosphere no more than 10 grams of VOC per tire cemented for each month. Compliance determined by monitoring VOC content of cement and number of treads processed. Exceedances are to be corrected immediately or within two days of calculating the monthly average . Exceedances are to be included in applicable reports in this permit.

Monitoring Frequency: MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 23: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 40CFR 60.543(d), NSPS Subpart BBB

Item 23.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU03
Process: 004 Emission Source: 0ES17

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 23.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
This section of the rule contains methods and calculations for determining compliance with the gram/tire limits specified in 60.542(a)(3), (a)(5)(i), (a)(5)(ii), (a)(7)(i), and (a)(7)(ii). Monitoring of VOC density, mass of VOC per month and total number of treads cemented per month are to be tracked to determine compliance.
The overspray waste cement solvent content collected at the spray station is analyzed for VOC once every six months. waste cement that is disposed of off site for fuels blending or incineration and cement that is reintroduced into the cement tank for reuse can be subtracted from the total amount of VOC released to atmosphere at this source. Exceedances are to be corrected within two days after determining monthly average or as soon as possible. All exceedances must be reported to this office as required by this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 24: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 212.6

Item 24.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU04

Item 24.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Dunlop will operate emission unit EU04 sources in a manner consistent with good operating and maintenance practices, thus ensuring compliance with opacity limit of 20% or greater during any 6 consecutive minutes from any process emission source, except for emission of uncombined water. Emission unit EU04 is comprised of both controlled and uncontrolled emission sources. For the controlled emission point (04-01), Dunlop will inspect and maintain cyclone weekly. This piece of equipment will also be operated in accordance with manufacturers specifications. For uncontrolled emission points within EU04 (02-19, 02-20, 04-02), proper operation will ensure opacity compliance. Records of all maintenance will be maintained on site.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 25: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 212.6

Item 25.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU05

Item 25.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Dunlop will operate emission unit EU05 in a manner consistent with good operating practices, thus ensuring compliance with opacity limit of 20% or greater during any 6 consecutive minutes form any process emission source, except for emission of uncombined water. Emission unit EU05 is comprised of only uncontrolled emission sources. For the emission points within EU05(10-06, 11-04, 11-05, 14-04, 14-05) proper operation will prevent opacity exceedances. Records of all maintenance will be kept on site.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 26: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 40CFR 60.542(a)(5)(i), NSPS Subpart BBB

Item 26.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU05

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 26.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Limit is 1.2 grams of VOC per tire sprayed with an inside green tire spray, for each month. Compliance determined by method 24 anaylsis of coating as specified in 40 cfr 60.543(b)(4) and 545(f).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 27: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 40CFR 60.543(b)(4), NSPS Subpart BBB

Item 27.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU05

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 27.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Monitor VOC content of spray to determine compliance with this section for VOC content less than 1% by weight. Formulation data or analysis using method 24 required annually unless formulation changes in which case formulation data or method 24 analysis report due within 30 days of change.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 28: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 40CFR 60.546(f), NSPS Subpart BBB

Item 28.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU05

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 28.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Maintain EPA method 24 data for VOC analysis of green tire spray formulation. Must be less than 1% by weight VOC.

Monitoring Frequency: CONTINUOUS
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 29: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 40CFR 60.546(j), NSPS Subpart BBB

Item 29.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU05

Item 29.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
For each tread end cement operation and green tire spray operation(inside and outside) using water based sprays containing less than 1.0%, by weight, of VOC as described in 60.543(b)(1) 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. 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. 40 cfr 60.545(f) requires record maintenance of formulation data or the results of Method 24 analysis conducted to verify the VOC content of the spray.

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 12 calendar month(s).

Condition 30: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 30.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU06

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 30.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
All of the emission points are controlled by cyclone separation devices. Dunlop will monitor the control device operation by routinely performing visual inspections of the body of the cyclone during maintenance activities. The cyclone separation devices are emptied weekly. The associated duct work is cleaned two times per week. Inspections of the system are performed during each of these events. Additionally, the maintenance department performs a semiannual preventative maintenance procedure. Records of these events are on file and available for review. This applies to all emission points with control under this emission unit. Semi annual reports are required as detailed in 201-6 of this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 31: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 212.6

Item 31.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU06

Item 31.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Dunlop will operate emission unit EU06 sources in a

manner consistent with good operating and maintenance practices, thus ensuring compliance with opacity limit of 20% or greater during any 6 consecutive minutes from any process emission source, except for emission of uncombined water.
Emission unit EU06 is comprised of both controlled and uncontrolled emission sources. For controlled emission points (13S05, 13S06, 13S04, 12-06, 13-07, 13S09, 13-10 and 13S06). Dunlop proposes that the activities indicated for 212.3 and 212.4 compliance will serve , in part, as a compliance demonstration with respect to part 212.6. all of the emission points are controlled by cyclone separation devices. Dunlop proposes to monitor the control device operation by routinely performing visual inspections of the body of the cyclone during maintenance activities. The cyclone separation devices are checked weekly and emptied if necessary. The associated duct work is cleaned two times per week. Inspections are performed during each of these events. Additionally, the maintenance department performs semiannual preventative maintenance procedure and records maintained. For uncontrolled emission points within eu06 (08-11, 08-12, 10-04, 13S07, 13-01, and 14-06), the only activity necessary to ensure opacity compliance is for process operators to continue to operate the emissions-producing equipment in a proper manner, thereby avoiding any operational problems.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 32: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 212.3(b)

Item 32.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU06
Process: 015

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 32.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
All emission points are controlled by cyclone separation devices. Dunlop proposes to monitor control device operation by routinely performing visual inspection of the body of the cyclone during maintenance activities. Cyclone separation devices are emptied weekly if necessary. The associated duct work is cleaned two times per week. Inspections of the system are performed during each of these events. Additionally, the maintenance department performs a semiannual preventative maintenance procedure. Records of these preventative procedures are on file in the maintenance department and will be made available to the department personnel upon request. Emission points 13S01,13S04 and 13S05 emit solid particulate matter emissions. These emissions are specified as "B" rated pollutants. Therefore the permissible emission rate for these points are 0.15 grains/dscf of exhaust gas.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 33: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 212.4

Item 33.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU06
Process: 015

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 33.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

All emission points are controlled by cyclone separation devices. Dunlop proposes to monitor control device operation by routinely performing visual inspection of the body of the cyclone during maintenance activities. Cyclone separation devices are emptied weekly if necessary. The associated duct work is cleaned two times per week. Inspections of the system is performed during each of these events. Additionally, the maintenance department performs a semiannual preventative maintenance procedure. All records of mentioned activities are maintained on site.

Emission points 13S06, 12-06, 13-07, 13S09, and 13-10 emit solid particulate matter subject to the 0.05 grains/dscf standard.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 34: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 212.6

Item 34.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU07

Item 34.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Dunlop will operate emission unit EU07 in a manner consistent with good operating and maintenance practices, thus ensuring compliance w/opacity limit of 20% or greater during any 6 consecutive minutes from any process emission source, except for emission of uncombined water.

Emission unit EU07 is comprised of two controlled emission sources, controlled by cyclone separation devices. For

controlled emission points 10-05 and 06-14, Dunlop proposes to monitor the control devices operation by routinely performing visual inspections of the body of the cyclones during maintenance activities. The cyclones are emptied weekly if necessary, duct work cleaned two times per week and inspection of the system performed during each of these events. Additionally the maintenance department performs a semiannual preventative maintenance procedure. All records of activities maintained on site.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 35: Compliance Certification
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable Federal Requirement: 6NYCRR 212.6

Item 35.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU08

Item 35.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Dunlop will operate emission unit EU08 in a manner consistent with good operating practices, thus ensuring compliance with opacity limit of 20% or greater during any 6 consecutive minutes from any process emission source, except for emission of uncombined water.
Emission unit EU08 is comprised of a single uncontrolled emission source. For emission source ES50 and associated emission point 04-10, the only activity necessary to ensure opacity compliance is proper operation. The magnitude of emissions are minimal and opacity has essentially been a non-issue for a similar source operated at another Dunlop facility.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

STATE ONLY APPLICABLE REQUIREMENTS
The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 36: Contaminant List
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable State Requirement: ECL 19-0301

Item 36.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this

permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000064-17-5
Name: ETHYL ALCOHOL (ETHANOL)

CAS No: 0NY100-00-0
Name: HAP

CAS No: 0NY210-00-0
Name: OXIDES OF NITROGEN

CAS No: 0NY075-00-0
Name: PARTICULATES

CAS No: 007446-09-5
Name: SULFUR DIOXIDE

CAS No: 0NY998-00-0
Name: VOC

Condition 37: Unavoidable noncompliance and violations
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable State Requirement: 6NYCRR 201-1.4

Item 37.1:
At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction

occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 44: Air pollution prohibited
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable State Requirement: 6NYCRR 211.2

Item 44.1:
No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

****** Emission Unit Level ******

Condition 46: Compliance Demonstration
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable State Requirement: 6NYCRR 225-1.2(a)(2)

Item 46.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0EU01
Process: 002

Regulated Contaminant(s):
CAS No: 007446-09-5 SULFUR DIOXIDE

Item 46.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
The no. 6 residual fuel oil utilized for boilers will be restricted to max of 1.5% sulfur by weight. This can be verified via documentation from Dunlop's fuel supplier and independent analysis of the fuel stock. Analysis performed monthly and reported to NYSDEC on a semi-annual basis. The format of the report is based on a 12 month rolling average. This documentation is maintained at the facility and is available to NYSDEC during any on-site inspection. This requirement is associated with emission unit EU01. Contained within EU01 are emission sources ES01, ES02, ES03, ES04, and ES05. ES01 and ES02 exhaust to emission point 00001, ES03 and ES04 exhaust to 00003 and ES05 exhausts to 00004.

Parameter Monitored: SULFUR
Upper Permit Limit: 1.5 percent by weight
Reference Test Method: METHOD 19
Monitoring Frequency: PER DELIVERY
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 47: Compliance Demonstration
Effective between the dates of 12/02/2004 and 12/01/2009

Applicable State Requirement: 6NYCRR 227-1.2(a)(2)

Item 47.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0EU01
Process: 002

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 47.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
Dunlop proposes to utilize published particulate emission factor from AP-42 for no. 6 fuel oil together with heating value of fuels of interest to demonstrate compliance with particulate emission limitation of 0.2 lbs/mmbtu for oil for boiler 1,2,5,6. This is intended to be a worst case calculation, as shown below. Note that a particulate limitation does not exist when combusting natural gas, which is also utilized as a primary fuel.
Boiler nos. 1,2,5,6 - no. 6 oil
Particulate emission factor:
9.19(S) +3.22 lbs/1000 gal, where S=sulfur content, %
9.19(1.5)+3.22= 17 lbs/ 1000 gallons= 0.017 lbs/gallon
0.017 lbs/gallon x gal/138,000 btu x 1,000,000 btu/mmbtu
=0.123 lbs particulate/mmbtu
(*note: typical sulfur content of #6 oil in this area is 1.1%)
Reflects compliance with 227-1.2(a)(2).
This requirement is associated with emission unit EU01.
Contained within EU01 is emission sources ES01, ES02, ES03, ES04. ES01 and ES02 exhaust to 00001 and ES03 and ES04 exhaust to 00003.
ES05, boiler no. 7 is not applicable to this requirement due to the rated capacity of the unit (<50 mmbtu/hr)
A stack test may be required to demonstrate compliance if opacity exceedances occur.

Work Practice Type: PROCESS MATERIAL THRUPUT
Process Material: NUMBER 6 OIL
Upper Permit Limit: 0.2 pounds per million Btus
Reference Test Method: METHOD 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 6 calendar month(s).