PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 9-1464-00030/00199
Effective Date: 01/23/2018 Expiration Date: 01/22/2023

Permit Issued To:SUMITOMO RUBBER USA, LLC
PO BOX 1109
BUFFALO, NY 14240-1109

Contact: MARK R CRAFT
SUMITOMO RUBBER USA LLC
PO BOX 1109
BUFFALO, NY 14240-1109
(716) 879-8497

Facility: SUMITOMO RUBBER USA LLC
10 Sheridan Dr
Tonawanda, NY 14150

Contact: MARK R CRAFT
SUMITOMO RUBBER USA, LLC
PO BOX 1109
BUFFALO, NY 14240-1109
(716) 879-8497

Description:

Sumitomo Rubber produces truck, motorcycle and automobile tires and is located at 10 Sheridan Drive in the Town of Tonawanda, Erie County. The ownership changed from Goodyear Dunlop Tires North America, Ltd. to Sumitomo Rubber USA, LLC during the first half of 2016, and the facility is now called Sumitomo Rubber. The facility produces about 12,000 tires a day. The facility consists of 1.9 million square feet of manufacturing and warehousing on 130+ acres of land. This permit includes a multiyear project to increase production.

The facility mixes all the ingredients together to make rubber, extrudes rubbers into shapes, combines metal and fabric into rubber strips (calendaring), assembles tires, vulcanizes and cures tires, shapes finished tires, and performs quality assurance and quality control on the final products which are then stored in a large warehouse on site. Five boilers generate process steam and heat at for the facility. Four boilers are dual fuel, natural gas and residual oil. One boiler burns only natural gas. Three emergency engines are on site along with a number of emission sources that are exempt from air permitting.

Sumitomo Project Description
The permit renewal incorporates a major modification for expanded operations by increasing the utilization of the six current Banbury mixers and installing a new Banbury mixer over a three year period. Production of passenger/light truck tires will increase from approximately 5,000 tires per day to 10,000 tires per day along with maintaining current production of 5,000 motorcycle tires per day and 2,000 medium truck/bus tires per day for a facility wide rubber production capacity of 250 million pounds of rubber tire components per year. Since this project removed a bottleneck in prior facility operations, facility wide emissions were evaluated to determine New Source Review (NSR) applicability. The facility is an existing major source for both nonattainment NSR and Prevention of Significant Deterioration. The only pollutant to have a Project Emission Potential greater than its Significant Project Threshold is volatile organic compounds (VOC). The facility does not have any contemporaneous decreases in VOC emissions so the project is subject to control requirements that meet the definition of Lowest Achievable Emission Rate (LAER) for VOC and to use Emission Reduction Credits (ERCs) to offset the increase in VOC emissions. For the existing Banbury mixers, the bulk of the VOC emissions are in the form of ethanol which is formed as a result of using organo-silane coupling agents. Of the six current Banbury mixers, only mixers 8 and 9 (emission sources 0ES08 and 0ES09) are equipped with the appropriate raw material feed systems to accommodate the use of large quantities of the coupling agent. Phase 1 of the modification includes routing the exhaust from mixers 8 and 9 to a new regenerative thermal oxidizer (RTO #1, emission source RTO01) to comply with the LAER requirements of NSR. LAER for Phase 1 is 3.4 lb pounds of VOCs per hour. Phase 2 is the installation of a new Banbury mixer, Mixer 10, (emission source 0ES0A) which can incorporate large quantities of the coupling agents. Its exhaust will be routed to the same RTO (RTO #1,) to meet the LAER requirement. LAER for Phase 2 of the project is 5.1 pounds of VOCs per hour. The facility will be using 137.93 tons of VOC ERCs, they created from reductions in 1993, to offset the increase in VOC emissions.

The facility previously had an emission cap that limited ethanol emissions to 39 tons a year to avoid applicability of NSR. As part of the modification, facility operations expanded and ethanol emissions have a potential greater than 39 tons a year. This cap remains in effect until the RTO is operating, then the LAER limits and facility-wide VOC limits must be met. Ethanol is included in the new facility wide VOC netting limit.

A prior permit modification which was incorporated with the Ren 2 Mod 0 Title V permit allowed for the usage of resorcinol as a raw material. The usage of this material generated emissions of VOCs and the projected increase was less than 20 tons of VOC. Thus, that modification was subject to the reasonable possibility provisions under 6 NYCRR Part 231-11.2(b) with recordkeeping requirements for a period of five years.

The five year period has come to a close with annual VOC emissions from the usage of resorcinol below 20 tons in accordance with Part 231-11.2(b). Since there is no longer a reasonable possibility that the modification to add resorcinol as a raw material triggered the Significant Project Threshold of 40 tons VOC, the condition limiting its usage has been removed from this permit, Ren 3 Mod 0 Title V permit. Upon further review of Resorcinol, it was determined that its vapors deposit below 300 F and that it would be emitted as a particulate. It is no longer considered a VOC. Particulate emissions from the mixers are controlled by cartridge filter dust collectors.

For pollutants other than VOC, the emission increases from the project were less than the applicability thresholds for a major modification under Part 231. However, since the emissions from the existing sources were based on projected facility output, the facility is required to comply with the reasonable possibility provisions of Part 231. For a period of at least five years after the issuance of the Ren 3 Mod 0 the facility will maintain a description of the modification including the sources associated with the project and their project emission potential.

This permit renewal included an updated VOC RACT Analysis for the whole facility, revised on June 27, 2017. The Analysis concluded that only Banbury Mixers 8 and 9 along with their discharge conveyors exceed the VOC RACT thresholds in 6 NYCRR Part 212-3 of 15 pounds per day and 3 pounds per hour from each emission point. Mixers 8 and 9 are part of the increased production project and required to install LAER, which was accepted to be an RTO. This meets and exceeds the RACT requirement of 81% control. A technical and economic feasibility study was conducted for the two conveyors. It identified three feasible control technologies. It concluded that none were economically feasible. Therefore, no emission controls are required for the mixer 8 and 9 conveyors. An updated RACT Analysis is due in five years with the next permit renewal application.

EPA’s AERSCREEN program was used to conduct a Part 212 air dispersion evaluation using the facility wide emissions. Sumitomo also conducted a Part 212 air dispersion evaluation of the emissions that increase with the production increase project. Both evaluations concluded that the ambient air concentrations were acceptable, following the Department’s DAR-1 Policy, Guidelines for the Evaluation and Control of Ambient Air Contaminants Under Part 212.

The following minor permit modifications occurred during the recent permit term and were added to this permit:

- A heat recovery unit that boilers 1, 2, 5 and 6 can exhaust through, emission point 00005, was added to the boiler house in late 2010. This increased the energy efficiency of the boiler hours. This did not result any new emissions.

- A natural gas emergency generator was installed in May 2011 to provide electric backup to the plants information system. The 268 hp engine is subject to the New Source Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, 40 CFR 60 subpart JJJJ. Subpart JJJJ conditions have been added to the permit.
- A new rotoclone hydrostatic precipitator was added to the MTR Finishing Department in March 2012. This included emission point 10011 and is subject to the same particulate and visible emission requirements as the existing rotoclone.
- Banbury mixer #11's two-wing rotor was replaced with a six-wing rotor in early 2013. This increased the number of batches of rubber produced hourly which increased the potential VOC emissions less than 3 tons a year from emission points 01H17 and 01F15. The increase was below New Source Review and Prevention of Significant Deterioration programs. The VOC emissions are below 3 pounds and hour so a VOC RACT review was not required.

Permit conditions were revised to use updated information. Permit conditions were added for revised regulations and for new regulations that now apply to the facility. Permit conditions were removed for requirements that no longer apply. The following changes were made to the permit: changed all references of 'Dunlop', 'Goodyear Dunlop Tires North America', 'GDTNA' or similar to 'this facility' or similar; updated the NOx emission cap emission factors to the current emission factors in EPA's AP-42 document; updated the boiler particulate compliance demonstration permit condition using the current sulfur in fuel limit in 6NYCRR Part 225-1; added a condition for the new sulfur in fuel requirements in 6NYCRR Part 225-1; added a condition for the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63 subpart JJJJJJ which requires fuel oil monitoring to evaluate applicability; consolidated the Continuous Assurance Monitoring (CAM, 40 CFR Part 64) permit conditions into one; added permit conditions for 40 CFR Part 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines that apply to the fire pump emergency engine and lighting emergency generator; added permit conditions for 40 CFR 60 Subpart JJJJ, New Source Standards of Performance for Stationary Spark Ignition Internal Combustion Engines that applies to the information system emergency generator; corrected errors with emission sources and emission point identifications; and corrected typos.

The fire pump emergency diesel engine, information system emergency natural gas engine (generator), and the lighting system emergency natural gas engine (generator) were added to the permit. They are exempt from air permitting but subject to EPA regulations that have been added to the permit.

Background

1.) The facility consists of eight emission units, where emission unit (EU) 0-0EU01 includes all 5 boilers, a boiler house heat exchanger and the three emergency engines; EU 0-0EU02 includes raw material handling and rubber mixing; EU 0-0EU03 includes tread extrusion processes; EU 0-0EU04 includes calendering, where a continuous textile or steel wires are bonded to one or two layers of rubber; EU 0-0EU05 includes assembling tires from multiple pieces of rubber which are loaded into isostatic presses that vulcanize (cures) the tire; EU 0-0EU06 includes testing the tires for uniformity and shaping to meet specifications; EU 0-0EU07 includes Quality Assurance and Quality Control destructive testing; and EU 0-0EU08 includes the electron processing system (EBR) which pre-cures rubber.
2.) Annual emission limits (caps) from previous permits are included in this permit. The caps include:
- Capping fugitive volatile organic compounds (VOC) to less than 142.5 ton per year (tpy) to create 52 tpy of VOC Emission Reduction Credits (ERC's). These ERC's were created when VOC emissions decreased due to process changes, adding air condition to the facility and reducing solvent usage during the 1991-1993 time frame.
- Capping individual Hazardous Air Pollutants (HAPs) emissions to 9.9 tpy to stay below the major source applicability limit of 10 tpy.
- Capping total HAP emissions to 24.9 tpy to stay below the major source applicability limit of 25 tpy.
- Capping Oxides of Nitrogen (NOx) at 99 tpy to stay below the major source applicability criteria of 100 tpy. This cap keeps the facility below the 100 tpy applicability criteria for NOx RACT also.

The permit includes a condition that documents the creation of 105 tpy VOC ERC's after the bias tire line was shutdown between April 1991 and February 1993. The facility is subject to 40 CFR 60 Subpart BBB, New Source Standards of Performance for the Rubber Tire Manufacturing Industry. Subpart BBB regulates the VOC's from tread end cementing operation and the VOC's from the green tire spraying operation.

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: DAVID S DENK
DIVISION OF ENVIRONMENTAL PERMITS
270 MICHIGAN AVE
BUFFALO, NY 14203-2915

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 compliance 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 any 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.

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, modifications and transfers
Permit modifications, suspensions or revocations by the Department
Facility Level
Submission of application 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 enforceable 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, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

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.

Item3.2:
The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and 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 or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:
The Department reserves the right to exercise all available authority 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 application for permit modification or renewal-REGION 9 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (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 14203-2915
(716) 851-7165

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:SUMITOMO RUBBER USA, LLC
PO BOX 1109
BUFFALO, NY 14240-1109

Facility: SUMITOMO RUBBER USA LLC
10 Sheridan Dr
Tonawanda, NY 14150

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

Permit Effective Date: 01/23/2018 Permit Expiration Date: 01/22/2023

LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS
Facility Level

1 6 NYCRR 200.6: Acceptable Ambient Air Quality
2 6 NYCRR 201-6.4 (a) (7): Fees
3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
6 6 NYCRR 201-6.4 (e): Compliance Certification
7 6 NYCRR 202-2.1: Compliance Certification
8 6 NYCRR 202-2.5: Recordkeeping requirements
9 6 NYCRR 215.2: Open Fires - Prohibitions
10 6 NYCRR 200.7: Maintenance of Equipment
11 6 NYCRR 201-1.7: Recycling and Salvage
12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
14 6 NYCRR 201-3.2 (a): Compliance Certification
15 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
16 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
17 6 NYCRR 201-6.4 (a) (8): Right to Inspect
18 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
19 6 NYCRR 202-1.1: Required Emissions Tests
20 40 CFR Part 68: Accidental release provisions.
21 40CFR 82, Subpart F: Recycling and Emissions Reduction
22 6 NYCRR 200.3: False statement
23 6 NYCRR Subpart 201-6: Emission Unit Definition
24 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
25 6 NYCRR Subpart 201-7: Facility Permissible Emissions
*26 6 NYCRR Subpart 201-7: Capping Monitoring Condition
*27 6 NYCRR Subpart 201-7: Capping Monitoring Condition
*28 6 NYCRR Subpart 201-7: Capping Monitoring Condition
*29 6 NYCRR Subpart 201-7: Capping Monitoring Condition
*30 6 NYCRR Subpart 201-7: Capping Monitoring Condition
31 6 NYCRR 211.1: Air pollution prohibited
32 6 NYCRR 212-3.1 (f): Compliance Certification
33 6 NYCRR 225-1.2 (e): Compliance Certification
34 6 NYCRR 231-2.6 (a): Compliance Certification
35 6 NYCRR 231-6.4: Compliance Certification
36 6 NYCRR 231-6.4: Compliance Certification
37 6 NYCRR 231-11.1: Compliance Certification
38 6 NYCRR 231-11.2 (b): Compliance Certification
39 40CFR 60, NSPS Subpart JJJ: Compliance and Enforcement
40 40CFR 63, Subpart JJJJJJ: Compliance and Enforcement
41 40CFR 63, Subpart ZZZZ: Compliance and Enforcement
42 40 CFR 64.8: Elements of a Quality Improvement Plan

Emission Unit Level

43 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
44 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

EU=0-0EU01
45 6 NYCRR 227-1.3: Compliance Certification
46 40CFR 63, Subpart ZZZZ: Compliance Certification

EU=0-0EU01,Proc=002
47 40CFR 63.11194(a), Subpart JJJJJJ: Compliance Certification

EU=0-0EU01,EP=00006

48 40CFR 60.4243(b)(1), NSPS Subpart JJJJ: Compliance by purchasing a certified engine
49 40CFR 60.4243(d), NSPS Subpart JJJJ: Compliance Certification

EU=0-0EU02
50 6 NYCRR 212-1.6 (a): Compliance Certification
51 40 CFR Part 64: Compliance Certification

EU=0-0EU02,EP=00160,Proc=003,ES=RTO01
52 6 NYCRR 212-3.1 (a): Compliance Certification
53 6 NYCRR 212-3.1 (a): Compliance Certification
54 6 NYCRR 231-6.5: Compliance Certification
55 6 NYCRR 231-6.5: Compliance Certification
56 6 NYCRR 231-6.5: Compliance Certification
57 6 NYCRR 231-6.5: Compliance Certification

EU=0-0EU03
58 6 NYCRR 212-1.6 (a): Compliance Certification

EU=0-0EU03,Proc=004,ES=0ES17
59 40CFR 60.542(a)(3), NSPS Subpart BBB: Compliance Certification

EU=0-0EU04
60 6 NYCRR 212-1.6 (a): Compliance Certification

EU=0-0EU05
61 6 NYCRR 212-1.6 (a): Compliance Certification
62 6 NYCRR 231-6.5: Compliance Certification
63 40CFR 60.542(a)(5)(i), NSPS Subpart BBB: Compliance Certification
64 40CFR 60.542(a)(5)(ii), NSPS Subpart BBB: Compliance Certification

EU=0-0EU06
65 6 NYCRR 212-1.6 (a): Compliance Certification
66 6 NYCRR 212-2.4 (b): Compliance Certification

EU=0-0EU07
67 6 NYCRR 212-1.6 (a): Compliance Certification

EU=0-0EU08
68 6 NYCRR 212-1.6 (a): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS
Facility Level

69 ECL 19-0301: Contaminant List
70 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities

Emission Unit Level

EU=0-0EU01,Proc=002

71 6 NYCRR 227-1.2 (a) (2): Compliance Demonstration
72 6 NYCRR 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: **Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 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 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item B: **Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.2 (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 C: **Certification by a Responsible Official - 6 NYCRR 201-6.2 (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 D: **Requirement to Comply With All Conditions - 6 NYCRR 201-6.4 (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 E: **Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.4 (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 F: **Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4 (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 G: **Property Rights - 6 NYCRR 201-6.4 (a) (6)**

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

Item H: **Severability - 6 NYCRR 201-6.4 (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 I: **Permit Shield - 6 NYCRR 201-6.4 (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 J: Reopening for Cause - 6 NYCRR 201-6.4 (i)

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

i. When additional applicable requirements under the act become applicable to a title V facility with a remaining permit term of 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 the 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 section 201- 6.6 of this Subpart.

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 K: **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 L: **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: **Acceptable Ambient Air Quality**
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 200.6

Item 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 2: **Fees**
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (7)

Item 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 72-0303.

Condition 3: **Recordkeeping and Reporting of Compliance Monitoring**
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 201-6.4 (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 201-6.2 of Part 201.

Condition 4: **Records of Monitoring, Sampling, and Measurement**
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 201-6.4 (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 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 201-6.4 (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 201-6.2(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 may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent 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) and one copy shall be sent to the Administrator (or his or her representative). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 6: **Compliance Certification**
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 201-6.4 (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 annual compliance certifications may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent 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) and one copy shall be sent to the Administrator (or his or her representative). The mailing addresses for the above referenced persons are:

Chief – Stationary Source Compliance Section
USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer
NYSDEC Region 9 Headquarters
270 Michigan Avenue
Buffalo, NY 14203-2915

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 1/30/2019.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 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 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 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 9: Open Fires - Prohibitions
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 215.2

Item 9.1:
Except as allowed by Title 6 NYCRR Section 215.3, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item 9.2
Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:
(a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
(b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
(c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
(d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
(e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
(f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
(g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
(h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
(i) Prescribed burns performed according to Part 194 of this Title.
(j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
(k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
(l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

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 10: Maintenance of Equipment
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 200.7

Item 10.1:
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 11: Recycling and Salvage
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 11.1:
Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 12.1:
No person shall unnecessarily 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 13: Exempt Sources - Proof of Eligibility
Effective between the dates of 01/23/2018 and 01/22/2023

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

Item 13.1:
The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

Condition 14: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

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

Item 14.1:
The Compliance Certification activity will be performed for the Facility.

Item 14.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
The emergency engines are exempt from air permitting provided each engine operates less than 500 hours per year, on a 12-month rolling total basis, per 6NYCRR 201-3.2(c)(6). Records will be kept on site of operating hours and will be made available upon request.

Parameter Monitored: HOURS OF OPERATION
Upper Permit Limit: 500 hours per year
Monitoring Frequency: MONTHLY
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 15: Trivial Sources - Proof of Eligibility
Effective between the dates of 01/23/2018 and 01/22/2023

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

Item 15.1:
The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

Condition 16: Requirement to Provide Information
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (4)

Item 16.1:
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 17: Right to Inspect
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (8)

Item 17.1:
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 18: Off Permit Changes
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 201-6.4 (f) (6)

Item 18.1:
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 201-6.4 shall not apply to any change made pursuant to this paragraph.

Condition 19: Required Emissions Tests
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 19.1:
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.

Condition 20: Accidental release provisions.
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:40 CFR Part 68

Item 20.1:
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 21: Recycling and Emissions Reduction
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:40CFR 82, Subpart F

Item 21.1:
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 22: False statement
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 200.3

Item 22.1:
No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

Condition 23: Emission Unit Definition
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 23.1:
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 (process P001) or #6 fuel oil (process 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 and operates on natural gas only. Boilers (1), (2), (5) and (6) have the ability to exhaust to a heat recovery unit prior to release through emission point 00005.
This emission unit also includes three emergency engines, which are exempt from air permitting provided each engine operates less than 500 hours per year. The engines are included in this permit to document their presence and because they are subject to federal regulations for engines.
- Diesel fire pump engine (0ES61) with associated emission point 00007,
- Natural gas information system backup generator (ISGEN) with associated emission point 00006, and
- Natural gas backup lighting generator (0ES62) with associated emission point 00008.

Building(s): #1 Substa
22
Fire Pump

Item 23.2:
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 final (also known as productive or non-productive) 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 processed in the finish mixers. A fan is used to pull dust and fumes (VOC's) off of each 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 for each mixer 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 stacked onto a pallet. Final 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 for tire components. Organo-silane coupling agents are added to some tread compounds 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 and the mixing temperature.
The facility is undertaking a two phase project to increase production:
PHASE 1
A regenerative thermal oxidizer (Emission Control RTO01) will be constructed and used to control VOC emissions from existing Banbury Mixers 8 and 9 (existing Emission Sources 0ES08 and 0ES09). The RTO will be located downstream of the dust collectors that control PM emissions from Mixers 8 and 9 (existing Emission Controls EC08A and EC09A). Emission point 00160 will be constructed to vent emissions from the RTO to the atmosphere. Existing Emission Points 00138 (Mixer 8) and 00151 (Mixer 9) will be re-purposed as alternate/RTO bypass emission points for use when: the rubber mixed doesn’t include organo-silane couplers; to protect the RTO from upset conditions; to vent the mixer exhaust fans during startup or shutdown of the RTO; and at times the mixers are not operating.

PHASE 2
A planned future Banbury mixer, Mixer 10, will be constructed in Phase 2 of this project. The Banbury Mixer is identified as Emission Source 0ES0A, which generates the majority of VOC emissions and all of the PM emissions. Emission Source ES0AB refers to the roller die take away conveyor and dip tank for the rubber from Mixer 10 which generate a small amount of VOC emissions. Emission Point 00161 will be constructed to vent emissions from the take-away conveyor and dip tank. A dust collector/baghouse (Emission Control EC0AA) will be constructed and used to control PM emissions from the planned future Mixer 10. When rubber with organo-silane coupling agent is mixed, the emissions from the dust collector/baghouse will be directed to the RTO to control VOC emissions from Mixer 10, and then out Emission Point 00160. When rubber is mixed without organo-silane coupling agent, the mixer exhaust will go to the PM dust collector and then will be directed to Emission Point 00162 instead of the RTO.

Building(s): 01

Item 23.3:
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
04
08
10

Item 23.4:
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 23.5:
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.

Building(s): 10
11
14

Item 23.6:
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.

Building(s): 08
10
12
13
14A

Item 23.7:
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 23.8:
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 manufacture's data indicate that up to 0.5 pounds of ozone can be generated per hour of operation.

Building(s): 04

Condition 24: Progress Reports Due Semiannually
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 201-6.4 (d) (4)

Item 24.1:
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 25: Facility Permissible Emissions
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 25.1:
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 PTE: 78,000 pounds per year
Name: ETHYL ALCOHOL (ETHANOL)

CAS No: 000075-09-2 PTE: 20,000 pounds per year
Name: DICHLOROMETHANE

CAS No: 000091-20-3 PTE: 20,000 pounds per year
Name: NAPHTHALENE

CAS No: 000108-10-1 PTE: 20,000 pounds per year
Name: 2-PENTANONE, 4-METHYL

CAS No: 000108-88-3 PTE: 20,000 pounds per year
Name: TOLUENE

CAS No: 000110-54-3 PTE: 20,000 pounds per year
Name: HEXANE

CAS No: 001330-20-7 PTE: 20,000 pounds per year
Name: XYLENE, M, O & P MIXT.

CAS No: 0NY100-00-0 PTE: 50,000 pounds per year
Name: TOTAL HAP

CAS No: 0NY210-00-0 PTE: 200,000 pounds per year
Name: OXIDES OF NITROGEN

CAS No: 0NY998-00-0 PTE: 403,000 pounds per year
Name: VOC

Condition 26: Capping Monitoring Condition
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 26.1:
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:

6 NYCRR Subpart 231-6

Item 26.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 26.3:
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 26.4:
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 26.5:
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 26.6:
The Compliance Certification activity will be performed for the Facility.

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

Item 26.7:
Compliance Certification shall include the following monitoring:

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

39 ton Ethanol Cap

1.) Ethanol emissions are capped at 39 tons per year until the regenerative thermal oxidizer, RTO #1 (emission source RTO01) is operating. Once the RTO is operating this cap is no longer in effect and then the plant must meet the lowest achievable emission rate (LAER) and facility wide VOC cap permit conditions.

2.) The facility will track and calculate monthly ethanol emissions from emission units 0EU02, raw materials handling and mixing, and 0EU05, tire building and curing. The monthly emissions will be used to calculate a rolling 12-month emission total.

3.) Records of the monthly and 12-month rolling total calculations shall be kept on site.

4.) Report the monthly and 12-month rolling totals semiannually.

Parameter Monitored: ETHYL ALCOHOL (ETHANOL)
Upper Permit Limit: 39 tons
Monitoring Frequency: MONTHLY
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 27: Capping Monitoring Condition
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 27.1:
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:

6 NYCRR Subpart 231-2

Item 27.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 27.3:
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 27.4:
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 27.5:
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 27.6:
The Compliance Certification activity will be performed for the Facility.

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

Item 27.7:
Compliance Certification shall include the following monitoring:

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

Non-stack Fugitive VOC Emissions from Solvent Usage

Fugitive emission reduction credits are documented in the Malcolm Pirnie September 1995 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. The facility 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:

1.) 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.

2.) 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.

3.) 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 emission reduction 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 from solvent usage and will track the fugitive emissions to demonstrate compliance.

a.) The Permittee must compute annual fugitive VOC emissions using a rolling 12-month period.

b.) The Permittee will submit semiannual reports which contain the 12-month rolling totals for each month in the reporting period.

c.) The following records shall be kept on site and made available upon request: facility wide solvent usage and VOC content of solvents. 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 such data 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 limit for fugitive VOC emissions from solvents 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's
Upper Permit Limit: 142.5 tons
Reference Test Method: EPA Methods
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 28: Capping Monitoring Condition
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 28.1:

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:

6 NYCRR Subpart 201-6

Item 28.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 28.3:
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 28.4:
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 28.5:
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 28.6:
The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000075-09-2	DICHLOROMETHANE
CAS No: 000108-10-1	2-PENTANONE, 4-METHYL
CAS No: 000108-88-3	TOLUENE
CAS No: 000110-54-3	HEXANE
CAS No: 001330-20-7	XYLENE, M, O & P MIXT.
CAS No: 000091-20-3	NAPHTHALENE

Item 28.7:
Compliance Certification shall include the following monitoring:

Capping: Yes
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
1.) The facility will limit the annual actual emissions of each single Hazardous Air Pollutant (HAP) to less than 10 tons per year. The individual HAP's are identified

above.

2.) Maintain records at the facility on a monthly basis that verify the facility's annual actual HAP emissions. Emissions are calculated from these records:
- the chemical content and usage of tread end cement, marking ink, miscellaneous paint, and solvents;
- rubber production and AP-42 emission factors; and
- fuel combustion and ap-42 emission factors.

3.) These records will be kept in a 12-month rolling total format.

4.) Report to the Department any exceedance of the annual actual emissions within 30 days after the exceedance.

5.) Report the actual 12-month rolling individual HAP emissions to the Department semiannually.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: RAW MATERIAL
Parameter Monitored: NAPHTHALENE
Upper Permit Limit: 19,999 pounds
Reference Test Method: EPA Methods
Monitoring Frequency: MONTHLY
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 29: Capping Monitoring Condition
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 29.1:
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:

6 NYCRR Subpart 201-6

Item 29.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 29.3:
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 29.4:
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 29.5:
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 29.6:
The Compliance Certification activity will be performed for the Facility.

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

Item 29.7:
Compliance Certification shall include the following monitoring:

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

1.) The facility will limit the annual actual emissions of total Hazardous Air Pollutants (HAPs) to less than 25 tons per year.

2.) Maintain records at the facility on a monthly basis that verify the facility's annual actual HAP emissions. Emissions are calculated from these records:
- chemical content and usage of tread end cement, marking ink, miscellaneous paint, and solvents;
- rubber production and AP-42 emission factors; and
- fuel combustion and ap-42 emission factors.

3.) These records will be kept in a 12-month rolling total format.

4.) Report to the Department any exceedance of the annual actual emissions within 30 days after the exceedance.

5.) Report the actual 12-month rolling HAP emissions to the Department semiannually.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: RAW MATERIAL
Parameter Monitored: TOTAL HAP
Upper Permit Limit: 49,999 pounds
Reference Test Method: EPA Methods
Monitoring Frequency: MONTHLY
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 30: Capping Monitoring Condition
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 30.1:
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:

6 NYCRR 227-2.3

Item 30.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 30.3:
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 30.4:
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 30.5:
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 30.6:
The Compliance Certification activity will be performed for the Facility.

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

Item 30.7:
Compliance Certification shall include the following monitoring:

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

100 tpy NOx Cap

The facility operates 5 existing combustion installations (dual fuel boilers) that can fire natural gas and # 6 fuel oil, as well as a few insignificant sources. The facility potential to emit exceeds 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 emit exceeding 100 tons per year (tpy) of NOx emissions meet Reasonable Available Control Technology (RACT) emission limits, or limit emissions below the applicability threshold.

The facility will 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 total. State and Federally enforceable permit conditions for the operation of the following boilers are detailed in a permit letter dated November 29, 1995; as follows:

Emission
Point Unit Manufacturer Heat Input - million Btu/hr
00001 A Babcock & Wilcox 59.0 start-up date 8/59
00001 B Babcock & Wilcox 59.0 start-up date 8/59
00003 A Babcock & Wilcox 60.0 start-up date 8/57

00003 B Babcock & Wilcox 60.0 start-up date 8/57
00004 Cleaver Brooks 29.3 start-up date 12/84

Operating Permit Conditions:

1. Facility wide emissions of NOx shall not exceed 100 tpy

as determined by summing the individual monthly emissions from the combustion of natural gas and #6 fuel oil during any consecutive 12 month period.

2. 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.

3. Obtain monthly statements from the fuel oil supplier as to the percent sulfur and nitrogen in the oil delivered. The nitrogen in oil test will be based on one of the following methods: ASTM D-3228-96, D4629-96, D5291-96 including current versions of these methods.

4. Calculate NOx emissions based on the following EPA AP-42 methods:

FUEL OIL
NOx = 55 lbs of NOx/1000 gallons of oil burned
Source: EPA's AP-42, Section 1.3, table 1.3-1, #6 oil < 100 million Btu/hr

NATURAL GAS
NOx = 140 lbs NOx/million cu.ft.
Source: EPA's AP-42, Section 1.4, table 1.4-1, < 100 million Btu/hr
(To be consitant with previous emissions calculation methods, they will continue to use this 140 lb/MMBtu emission factor.)

5. The facility must maintain monthly NOx emission records. Semiannual reports must be submitted to the department 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 this 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 re-issuance, or modification; or for denial of a permit renewal application.

8. Report the actual 12-month rolling NOx emissions to the Department semiannually.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: NATURAL GAS
Parameter Monitored: OXIDES OF NITROGEN
Upper Permit Limit: 199,999 pounds
Reference Test Method: EPA Methods
Monitoring Frequency: MONTHLY
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 31: Air pollution prohibited
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 211.1

Item 31.1:
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.

Condition 32: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 212-3.1 (f)

Item 32.1:
The Compliance Certification activity will be performed for the Facility.

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

Item 32.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

VOC RACT ANALYSIS

1.) The facility is a major source of Volatile Organic Compounds (VOCs). A VOC Reasonably Available Control Technology (VOC RACT) Analysis was submitted with the Title V Air Permit renewal application, dated February 9, 2015. Portions of the RACT Analysis were revised and submitted on October 12, 2016. A revised RACT analysis was

submitted on June 27, 2017.

2. The Analysis concluded that only Banbury Mixers 8 and 9 along with their discharge conveyors in EU 0-0EU02 exceed the VOC RACT thresholds in 6NYCRR Part 212-3 of 15 pounds per day and 3 pounds per hour from each emission point. Mixers 8 & 9 are part of the increased production project and are required to install the Lowest Achievable Emission Rate (LAER). LAER was accepted to be the use of an Regenerative Thermal Oxidizer (RTO). This meets and exceeds the RACT requirement of 81% control. A technical and economic feasibility was conducted for the two conveyors. It identified three feasible control technologies. It concluded that none were economically feasible. Therefore, no emission controls are required for the mixer 8 & 9 conveyors.

3.) The VOC emission rate potentials from other emission points built after August 15, 1994 are less than 3.0 pounds per hour and actual emissions are less than 15.0 pounds per day, so they did not require a RACT Analysis [6NYCRR 212-3.1(f)]. The VOC emission rate potential from emission points built before this date do not exceed the 3.0 pound per day applicability threshold [6 NYCRR Part 212-3.1(a)(c)].

4.) Any facility that is subject to 6NYCRR Part 212-3, Reasonably Available Control Technology for Major Facilities, after May 31, 1995 will remain subject to the RACT provisions even if the annual potential to emit NOx or VOCs later fall below the applicability threshold. [6NYCRR 212-3.1(e)]

5.) A RACT demonstration for VOC emissions must be submitted with each application for a permit to operate, including permit modifications and renewals. RACT must be implemented on these emission points when operation commences. A RACT analysis is not required for new emission points that do not meet the RACT applicability thresholds in 6NYCRR 212-3.

6.) The VOC RACT Analysis must be keep for at least 5 years. This condition contains no monitoring requirements.

7.) Semiannually report the compliance status, as required by 6NYCRR Part 201-6.4.

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 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 33: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 225-1.2 (e)

Item 33.1:
The Compliance Certification activity will be performed for the Facility.

Item 33.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:

Owners and/or operators of any stationary combustion installation that fires residual oil are limited to the purchase of residual oil with a sulfur content of 0.50% sulfur on or after July 1, 2014 and to the firing of residual oil with a sulfur content of 0.50% on or after July 1, 2016.

Data collected pursuant to this Subpart must be tabulated and summarized in a form acceptable to the Department, and must be retained for at least five years. The owner of a Title V facility must furnish to the Department such records and summaries, on a semiannual calendar basis, within 30 days after the end of the semiannual period. All other facility owners or distributors must submit these records and summaries upon request of the Department.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: RESIDUAL FUEL (#4, #5 AND/OR #6 FUEL OIL)
Parameter Monitored: SULFUR CONTENT
Upper Permit Limit: 0.50 percent by weight
Monitoring Frequency: PER DELIVERY
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 34: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

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

Item 34.1:
The Compliance Certification activity will be performed for the Facility.

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

This permit condition creates 105 tons per year of Volatile Organic Compound emission reduction credits.

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

1. 01K04 - tread end cement for bias truck and passenger tires, removed from service 9/92.
2. 02B05-02- undertread cement for bias truck and passenger tires, removed from service 9/92
3. 02B05-03- undertread cement for bias truck tires, removed from service 1/92
4. 02-03- undertread cement for Radial Light Truck Tires removed from service 4/91
5. 12-05- bead dipping, removed from service 2/93

The total emission reduction credit for the above removed sources is 105 tpy. Table 2-6 in the report summarizes the baseline year, total solvent usage and average baseline year emissions for each source. 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:
1. 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.

2. A similar technology advancement replaced the solvent in bead dipping. A thin tacky rubber liner is wrapped around the beads instead of dipping in solvent, source 12-05.
3. 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.
4. 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.

Semiannually confirm that the technology changes described above are in use as origianlly described.

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 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 35: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 231-6.4

Item 35.1:
The Compliance Certification activity will be performed for the Facility.

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

Item 35.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Use of Emission Reduction Credits

1.) This condition documents the applicant's use of emission reduction credits to offset increased volatile organic compound (VOC) emissions associated with a two phase project. Phase 1 is scheduled to commence in 2018 when the use of coupling agents in the rubber mix will increase, primarily from Banbary mixers 8 and 9. Regenerative thermal oxidizer (RTO) #1 will be installed to control VOC's, primarily ethanol, from mixers 8 & 9. Phase 2 is scheduled to commence in late 2018 when a new rubber mixer, Mixer 10, is installed. RTO #1 will also be used to control the VOC emissions from Mixer 10. Phase 2 will de-bottleneck facility operations.

2.) The Project Emission Potential (PEP) for Phase 1 is 62.10 tpy of VOCs, for Phase 2 is 57.84 tpy of VOCs, and for the whole project is 119.94 tpy of VOCs. The increase in VOC's must be offset using a 1.15 offset ratio (119.94 x 1.15 = 137.93 tons).

3.) The facility will use 137.93 tons of VOC Emission Reduction Credits (ERC's) that the facility created previously when they 1.) reduced use of solvents throughout the facility, 2.) stopped producing bias passenger and light truck tires, and 3.) shut down some emission points.

4.) A separate condition that limits VOC emissions 201.5 tons a year (12-month rolling total basis) will be used to demonstrate compliance with the project emission potentials.

5.) The condition does not include monitoring or reporting requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 36: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 231-6.4

Item 36.1:
The Compliance Certification activity will be performed for the Facility.

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

Item 36.2:
Compliance Certification shall include the following monitoring:

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

FACILITY VOC LIMIT

1.) Facility wide VOC's are limited to 201.5 tons per year on a 12-month rolling total basis. This limit, along with the use of emission reduction credits and Lowest Achievable Emission Rates (LAER) were initiated to comply with the New Source Review requirements in 6NYCRR Part 231-6, Modifications to Existing Major Facilities in Nonattainment Areas and Attainment Areas of the State

within the Ozone Transport Region.

2.) Calculate the monthly VOC emissions at the facility using fuel consumption, type of rubber mixed, the amount of rubber mixed per month, the coupler percentage in each batch, the coupler type, the ethanol emissions released per pound of coupling agent, rubber processing information along with emission factors from EPA's AP-42 document and the Rubber Manufacturing Association, or department approved emission factors. (Use same emission calculation methods as in the November 22, 2016 permit modification application.)

3.) Records supporting the above calculations must be kept for at least five years.

4.) Submit semiannually the 12-month rolling total VOC emissions for each month of the reporting period. Supporting information shall be submitted upon request.

Parameter Monitored: VOC
Upper Permit Limit: 201.5 tons
Monitoring Frequency: MONTHLY
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 37: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 231-11.1

Item 37.1:
The Compliance Certification activity will be performed for the Facility.

Item 37.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Any new major facility, NSR major modification or facility netting out of applicability subject to this Part must comply with the requirements of 6 NYCRR Part 201-6.5(a) of this Title and the following:

(1) Within 30 days of commencement of construction, the applicant must notify the department in writing that construction has begun.

(2) The filing of a request by the permittee for a permit

modification or renewal, or of a notification by the permittee of planned changes or anticipated noncompliance does not authorize the permittee to undertake any action without department approval. The permittee shall not begin actual construction or operate a new or modified facility without department approval in accordance with this Chapter. Operation in a manner other than authorized by a permit shall be grounds for enforcement.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 38: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 231-11.2 (b)

Item 38.1:
The Compliance Certification activity will be performed for the Facility.

Item 38.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

For a modification with a project emission potential that does not utilize the emissions exclusion allowed under section 231-4.1(b)(41)(i)(c) of this Part and which is less than 50 percent of the applicable significant project threshold in Table 3, Table 4 or Table 6 of Subpart 231-13 of this Part, or for a modification with a project emission potential which when added to emissions excluded in accordance with clause 231-4.1(b)(41)(i)(c) of this Part is less than 50 percent of the applicable significant project threshold in Table 3, Table 4 or Table 6 of Subpart 231-13 of this Part, the facility owner or operator, in addition to complying with any requirements under Part 201 of this Title, must maintain the following information for a minimum of five years:

(1) A description of the modification.

(2) An identification of each new or modified emission source(s) including the associated processes and emission unit.

(3) The calculation of the project emission potential for each modified emission source(s) including supporting documentation.

(4) The date the modification commenced operation.

These recordkeeping requirements apply to exempt and trivial activities but do not affect their exempt or trivial permitting status under Subpart 201-3 of this Title. The facility must submit these records to the Department, upon the Department's request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 39: Compliance and Enforcement
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:40CFR 60, NSPS Subpart JJJJ

Item 39.1:
The Department has not accepted delegation of 40 CFR Part 60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engine. Any questions concerning compliance and/or enforcement of this regulation should be referred to USEPA Region 2, 290 Broadway, 21st Floor, New York, NY 10007-1866; (212) 637-4080. Should the Department decide to accept delegation of 40 CFR Part 60 Subpart JJJJ during the term of this permit, enforcement of this regulation will revert to the Department as of the effective date of delegation.

Condition 40: Compliance and Enforcement
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:40CFR 63, Subpart JJJJJJ

Item 40.1:
The Department has not accepted delegation of 40 CFR Part 63 Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources. Any questions concerning compliance and/or enforcement of this regulation should be referred to USEPA Region 2, 290 Broadway, 21st Floor, New York, NY 10007-1866; (212) 637-4080. Should the Department decide to accept delegation of 40 CFR Part 63 Subpart JJJJJJ during the term of this permit, enforcement of this regulation will revert to the Department as of the effective date of delegation.

Condition 41: Compliance and Enforcement
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:40CFR 63, Subpart ZZZZ

Item 41.1:
The Department has not accepted delegation of 40 CFR Part 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. Any questions concerning compliance and/or enforcement of this regulation should be referred to USEPA Region 2, 290 Broadway, 21st Floor, New York, NY 10007-1866; (212) 637-4080. Should the Department decide to accept delegation of 40 CFR Part 63 Subpart ZZZZ during the term of this permit, enforcement of this regulation will revert to the Department as of the effective date of delegation.

Condition 42: Elements of a Quality Improvement Plan
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:40 CFR 64.8

Item 42.1:
A) Elements of a Quality Improvement Plan (QIP) [40 CFR 64.8(b)]:
(1) The owner or operator shall maintain a written QIP, if required, and have it available for inspection.
(2) The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:
(i) Improved preventive maintenance practices.
(ii) Process operation changes.
(iii) Appropriate improvements to control methods.
(iv) Other steps appropriate to correct control performance.
(v) More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (i) through (iv) above).

B) If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined [40 CFR 64.8(c)].

C) Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act [40 CFR 64.8(e)].

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

Condition 43: Emission Point Definition By Emission Unit
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 43.1:
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.): 4765.091 NYTME (km.): 180.635 Building: 22

Emission Point: 00003
Height (ft.): 31 Diameter (in.): 78
NYTMN (km.): 4765.11 NYTME (km.): 180.613 Building: 22

Emission Point: 00004
Height (ft.): 103 Diameter (in.): 24
NYTMN (km.): 4765.097 NYTME (km.): 180.625 Building: 22

Emission Point: 00005
Height (ft.): 31 Diameter (in.): 36
NYTMN (km.): 4764.84 NYTME (km.): 180.207 Building: 22

Emission Point: 00006
Height (ft.): 24 Diameter (in.): 5
NYTMN (km.): 4764.84 NYTME (km.): 180.207 Building: 50

Emission Point: 00007
Height (ft.): 24 Diameter (in.): 5
NYTMN (km.): 4764.781 NYTME (km.): 180.247 Building: Fire Pump

Emission Point: 00008
Height (ft.): 24 Diameter (in.): 5
NYTMN (km.): 4764.811 NYTME (km.): 180.281 Building: #1 Substa

Item 43.2:
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
NYTMN (km.): 4765.064 NYTME (km.): 180.162 Building: 01

Emission Point: 00126
Height (ft.): 59 Diameter (in.): 28
NYTMN (km.): 4765.137 NYTME (km.): 180.186 Building: 01

Emission Point: 00128
Height (ft.): 45 Diameter (in.): 42
NYTMN (km.): 4765.13 NYTME (km.): 180.192 Building: 01

Emission Point: 00129
Height (ft.): 47 Diameter (in.): 26
NYTMN (km.): 4765.091 NYTME (km.): 180.192 Building: 01

Emission Point: 00132
Height (ft.): 59 Diameter (in.): 28
NYTMN (km.): 4765.078 NYTME (km.): 180.103 Building: 01

Emission Point: 00134
Height (ft.): 48 Diameter (in.): 36
NYTMN (km.): 4765.071 NYTME (km.): 180.098 Building: 01

Emission Point: 00135
Height (ft.): 47 Diameter (in.): 26
NYTMN (km.): 4765.042 NYTME (km.): 180.14 Building: 01

Emission Point: 00138
Height (ft.): 59 Diameter (in.): 32
NYTMN (km.): 4765.116 NYTME (km.): 180.152 Building: 01

Emission Point: 00140
Height (ft.): 45 Diameter (in.): 36
NYTMN (km.): 4765.123 NYTME (km.): 180.147 Building: 01

Emission Point: 00144
Height (ft.): 59 Diameter (in.): 32
NYTMN (km.): 4765.124 NYTME (km.): 180.16 Building: 01

Emission Point: 00146
Height (ft.): 45 Diameter (in.): 42
NYTMN (km.): 4765.143 NYTME (km.): 180.171 Building: 01

Emission Point: 00147
Height (ft.): 47 Diameter (in.): 26
NYTMN (km.): 4765.075 NYTME (km.): 180.173 Building: 01

Emission Point: 00151
Height (ft.): 59 Diameter (in.): 31
NYTMN (km.): 4765.109 NYTME (km.): 180.133 Building: 01

Emission Point: 00152
Height (ft.): 47 Diameter (in.): 36
NYTMN (km.): 4765.114 NYTME (km.): 180.137 Building: 01

Emission Point: 00155
Height (ft.): 47 Diameter (in.): 21
NYTMN (km.): 4765.053 NYTME (km.): 180.153 Building: 01

Emission Point: 00160
Height (ft.): 56 Diameter (in.): 64
NYTMN (km.): 4764.84 NYTME (km.): 180.207 Building: 01

Emission Point: 00161
Height (ft.): 56 Length (in.): Width (in.):
NYTMN (km.): 4764.84 NYTME (km.): 180.207 Building: 01

Emission Point: 00162
Height (ft.): Length (in.): Width (in.):
NYTMN (km.): 4764.84 NYTME (km.): 180.207 Building: 01

Emission Point: 01F15
Height (ft.): 60 Diameter (in.): 28
NYTMN (km.): 4765.088 NYTME (km.): 180.113 Building: 01

Emission Point: 01H17
Height (ft.): 45 Diameter (in.): 24
NYTMN (km.): 4765.096 NYTME (km.): 180.122 Building: 01

Item 43.3:
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
NYTMN (km.): 4765.036 NYTME (km.): 180.17 Building: 02

Emission Point: 00214
Height (ft.): 38 Diameter (in.): 24
NYTMN (km.): 4765.026 NYTME (km.): 180.161 Building: 02

Emission Point: 00215
Height (ft.): 38 Diameter (in.): 44
NYTMN (km.): 4765.013 NYTME (km.): 180.14 Building: 02

Emission Point: 00217
Height (ft.): 48 Diameter (in.): 32
NYTMN (km.): 4765.07 NYTME (km.): 180.182 Building: 02

Emission Point: 00218
Height (ft.): 48 Diameter (in.): 24
NYTMN (km.): 4765.086 NYTME (km.): 180.199 Building: 02

Emission Point: 00221
Height (ft.): 40 Diameter (in.): 15
NYTMN (km.): 4764.98 NYTME (km.): 180.144 Building: 02

Emission Point: 00406
Height (ft.): 35 Diameter (in.): 24
NYTMN (km.): 4764.991 NYTME (km.): 180.259 Building: 04

Emission Point: 00413
Height (ft.): 35 Diameter (in.): 44
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 04

Emission Point: 00808
Height (ft.): 40 Diameter (in.): 20
NYTMN (km.): 4765.196 NYTME (km.): 180.3 Building: 08

Emission Point: 00809
Height (ft.): 31 Diameter (in.): 18
NYTMN (km.): 4765.188 NYTME (km.): 180.293 Building: 08

Emission Point: 00810
Height (ft.): 40 Diameter (in.): 20
NYTMN (km.): 4765.161 NYTME (km.): 180.267 Building: 08

Emission Point: 01010
Height (ft.): 40 Diameter (in.): 20
NYTMN (km.): 4764.84 NYTME (km.): 180.207 Building: 10

Emission Point: 02-19
Height (ft.): 40 Diameter (in.): 15
NYTMN (km.): 4764.98 NYTME (km.): 180.144 Building: 02

Item 43.4:
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
NYTMN (km.): 4764.976 NYTME (km.): 180.201 Building: 02

Emission Point: 00220
Height (ft.): 22 Diameter (in.): 21
NYTMN (km.): 4764.961 NYTME (km.): 180.149 Building: 02

Emission Point: 00402
Height (ft.): 35 Diameter (in.): 28
NYTMN (km.): 4764.993 NYTME (km.): 180.288 Building: 04

Emission Point: 00412
Height (ft.): 35 Diameter (in.): 18
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 04

Item 43.5:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0EU05

Emission Point: 01404
Height (ft.): 32 Diameter (in.): 24
NYTMN (km.): 4765.009 NYTME (km.): 180.515 Building: 14

Emission Point: 01405

Height (ft.): 30 Diameter (in.): 24
NYTMN (km.): 4765.012 NYTME (km.): 180.497 Building: 14

Emission Point: 01409
Height (ft.): 8 Diameter (in.): 24
NYTMN (km.): 4764.84 NYTME (km.): 180.207 Building: 14

Emission Point: 01410
Height (ft.): 30 Diameter (in.): 24
NYTMN (km.): 4764.994 NYTME (km.): 180.492 Building: 14

Item 43.6:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0EU06

Emission Point: 00812
Height (ft.): 14 Diameter (in.): 17
NYTMN (km.): 4765.255 NYTME (km.): 180.369 Building: 08

Emission Point: 01011
Height (ft.): 40 Diameter (in.): 24
NYTMN (km.): 4765.12 NYTME (km.): 180.429 Building: 10

Emission Point: 01312
Height (ft.): 40 Diameter (in.): 18
NYTMN (km.): 4764.99 NYTME (km.): 180.49

Emission Point: 01406
Height (ft.): 30 Diameter (in.): 24
NYTMN (km.): 4765.092 NYTME (km.): 180.562 Building: 14A

Item 43.7:
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
NYTMN (km.): 4764.886 NYTME (km.): 180.329 Building: 06

Emission Point: 00615
Height (ft.): 30 Diameter (in.): 12
NYTMN (km.): 4764.84 NYTME (km.): 180.207 Building: 06

Item 43.8:
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.): 4765.002 NYTME (km.): 180.338 Building: 04

Condition 44: Process Definition By Emission Unit
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 44.1:
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 - 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 (5) and (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. Boilers (1), (2), (5) and (6) have the ability to exhaust to a heat recovery unit prior to release through emission point 00005.

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 44.2:
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:
OIL COMBUSTION - Steam is produced by a combination of 4 boilers that are fired by #6 fuel oil. Boilers number (1) and (2) exhaust through emission point 00001. These built-up boilers, manufactured by Babcock & Wilcox, are

rated at 59 MMBtu/hr each. Boilers number (5) and (6) exhaust through emission point 3. These built-up boilers, manufactured by Babcock & Wilcox are rated at 60 MMBtu/hr each. Boilers (1), (2), (5) and (6) have the ability to exhaust to a heat recovery unit prior to release through emission point 00005.

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

Item 44.3:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU01
Process: 1ED Source Classification Code: 2-02-001-02
Process Description:
One emergency engine firing diesel fuel to power an emergency fire pump. Engine by Clarke Fire Pump Drivers, rated at 110 HP, installed 4/25/97.

Emission Source/Control: 0ES61 - Combustion
Design Capacity: 110 horsepower (mechanical)

Item 44.4:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU01
Process: 1EG Source Classification Code: 2-02-002-02
Process Description:
Two emergency engines fueled by natural gas that power electrical generators. The Information System (IS) generator is a Olympian Power Systems 268 horse power (200 kW) unit, installed on December 12, 2011. The Backup Lighting Generator uses a Waukesha engine rated at 360 horsepower and was installed in 1997.

Emission Source/Control: 0ES62 - Combustion
Design Capacity: 360 horsepower (mechanical)

Emission Source/Control: ISGEN - Combustion
Design Capacity: 268 horsepower (mechanical)

Item 44.5:

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 variable speed, shear type Banbury mixers. A fan is used to pull dust and fumes (VOC's) from each mixer and through a dust collector. 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. The mixed rubber stock is further processed in the facility and provided as tire components.

The Mixing Department will be modified to include three new emission points (00160, 00161 and 00162), two new emission sources (0ES0A - planned future Mixer 10 and ES0AB - the associated roller die take-away conveyor/dip tank), and two emission controls (RTO01 – an regenerative thermal oxidizer (RTO) used to control VOC emissions from Banbury Mixers 8, 9 and 10 and EC0AA - a dust collector used to control PM from the planned future Banbury Mixer 10). Existing emission points for Mixers 8 and 9, EP 00138 and EP 00151, will be re-purposed as alternate/RTO bypass emission points for use when: the rubber mixed doesn't include organo-silane couplers; to protect the RTO from upset conditions; to vent the mixer exhaust fans during startup or shutdown of the RTO; and at times the mixers are not operating. When rubber with organo-silane coupling agent is mixed, the emissions downstream of Mixer 8, 9 and 10 dust collectors will be directed to the RTO to control VOC emissions and then out Emission Point 00160. When rubber is mixed without organo-silane coupling agent, the mixer's exhaust will continue to be directed to the dust collectors but emissions downstream of the dust collectors will be directed to Emission Point 00138 for Mixer 8, Emission Point 00140 for Mixer 9, and Emission Point 00162 for Mixer 10 instead of the RTO. A high efficiency cartridge filter will be installed between the primary mixer dust collectors and the RTO to minimize particulate matter that may enter the RTO. The pre-RTO filter system is a secondary level of control in addition to the primary particulate matter control dust collectors for Mixers 8, 9, and 10 (i.e., EC08A, EC09A, and EC0AA). Mixer 10 was referred to as Mixer A in most of the application submissions.

Emission Source/Control: EC06A - Control
Control Type: FABRIC FILTER

Emission Source/Control: EC07A - Control

Control Type: FABRIC FILTER

Emission Source/Control: EC08A - Control
Control Type: FABRIC FILTER

Emission Source/Control: EC09A - Control
Control Type: FABRIC FILTER

Emission Source/Control: EC0AA - Control
Control Type: FABRIC FILTER

Emission Source/Control: EC11A - Control
Control Type: FABRIC FILTER

Emission Source/Control: EC12A - Control
Control Type: FABRIC FILTER

Emission Source/Control: RTO01 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 0ES06 - Process

Emission Source/Control: 0ES07 - Process

Emission Source/Control: 0ES08 - Process

Emission Source/Control: 0ES09 - Process

Emission Source/Control: 0ES0A - Process

Emission Source/Control: 0ES11 - Process

Emission Source/Control: 0ES12 - Process

Emission Source/Control: 0ES14 - Process

Emission Source/Control: 0ES15 - Process

Emission Source/Control: ES06B - Process

Emission Source/Control: ES07B - Process

Emission Source/Control: ES08B - Process

Emission Source/Control: ES09B - Process

Emission Source/Control: ES0AB - Process

Emission Source/Control: ES11B - Process

Emission Source/Control: ES12B - Process

Item 44.6:
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 are extruded. The extruded rubber treads are marked with a letter/number identification code and striped with ink. Ink is transferred to the tread surface by an offset printer and/or an inkjet printer. Treads are cut to length and some of 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: FL224 - Control
Control Type: FABRIC FILTER

Emission Source/Control: FL227 - Control
Control Type: FABRIC FILTER

Emission Source/Control: FL228 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0ES16 - Process

Emission Source/Control: 0ES17 - Process

Emission Source/Control: 0ES18 - Process

Emission Source/Control: CS227 - Process

Emission Source/Control: CS228 - Process

Emission Source/Control: TC227 - Process

Emission Source/Control: TC228 - Process

Emission Source/Control: TM227 - Process

Emission Source/Control: TM228 - Process

Item 44.7:
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 are extruded. These sidewalls will be used later in the tire building area.

Emission Source/Control: 0ES19 - Process

Emission Source/Control: 0ES20 - Process

Item 44.8:
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 are extruded. These profiles will be used later in the tire building area.

Emission Source/Control: 0ES20 - Process

Item 44.9:
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 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 44.10:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU03
Process: 07A Source Classification Code: 3-08-001-30
Process Description:
STRIP EXTRUSION to combine several types of previously mixed rubber compounds. Extruder consists of a power driven screw with a stationary cylinder. A die is attached to the head of the screw to produce the desired shape of rubber. The extruder, located in Dept 238, is identified as ES21A and will have a warming mill, (ES22A) and vent out EP 00413. Ink is transferred to the tread surface by an offset printer and or inkjet using water based inks.

Emission Source/Control: ES21A - Process

Emission Source/Control: ES22A - Process

Item 44.11:
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: GC618 - Process

Item 44.12:
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. The fabric for making tire plies coated with a thin film of rubber on both sides in the calender. The heat and vapor from this process are exhausted through hood exhausts.

Emission Source/Control: 0ES27 - Process

Emission Source/Control: ES26A - Process

Item 44.13:
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 00219. 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 00220.

Emission Source/Control: 0ES28 - Process

Emission Source/Control: 0ES29 - Process

Item 44.14:
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 CURING DEPARTMENT 213. Green tires are loading into an isostatic press that forms and vulcanizes the tire. The tire is vulcanized and pressed by the same operation. Emissions from the tire presses are fugitive in nature as they exhaust through large ventilation fans located in the raised section of the roof above the tire presses. All of the tire presses are grouped into one emission source: 0ES53.

The green motorcycle tires (and associated molds and bladders) 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. Emissions of VOCs are fugitive. The coatings contain less than 1% VOCs.

Emission Source/Control: 0ES30 - Process

Emission Source/Control: 0ES53 - Process

Item 44.15:
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 CURING DEPARTMENT 214. Green tires are loading into an isostatic press that forms and vulcanizes the tire. The tire is vulcanized and pressed by the same operation. Emissions from the tire presses are fugitive in nature as they exhaust through large ventilation fans located in the raised section of the roof above the tire presses. All of the tire presses are grouped into one emission source: 0ES54.

The green motorcycle tires (and associated molds and bladders) 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. Emissions of VOC's are fugitive. The coatings contain less than 1% VOCs.

Emission Source/Control: 0ES31 - Process

Emission Source/Control: 0ES54 - Process

Item 44.16:
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 CURING DEPARTMENT 236 & TIRE BUILDING DEPARTMENT 233. Green tires are loading into an isostatic press that forms and vulcanizes the tire. The tire is vulcanized and pressed by the same operation. Emissions from the tire presses are fugitive in nature as they exhaust through large ventilation fans located in the raised section of the roof above the tire presses. All of the tire presses are grouped into one emission source: 0ES55.

The inside of green truck and passenger car tires are sprayed with a water-based coating at three spray booths (Emission Sources SBLTR, SBNOE, SBSOE). The process also includes a bladder assembly station (Emission Source BLSTA). 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 01404 for the light truck radial and passenger car tire spray booth. Emission points 01405 and 01408 are for the original equipment tires spray booths.

Emission point 01409 is part of the bladder assembly station. The coatings contain less than 1% VOCs.

Emission Source/Control: 0ES55 - Process

Emission Source/Control: BLSTA - Process

Emission Source/Control: SBLTR - Process

Emission Source/Control: SBNOE - Process

Emission Source/Control: SBSOE - Process

Item 44.17:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU05
Process: 13A Source Classification Code: 3-08-001-06
Process Description:
TBR CURING DEPT. 614 - Green tires are loaded into an isostatic press that forms and vulcanizes the tire. The tire is vulcanized and pressed by the same operation. Emissions from the tire presses are fugitive in nature as they exhaust through large ventilation fans located in a raised section of the roof above the tire presses. All of the tire presses are grouped into one emission source, 0ES56.

Emission Source/Control: 0ES56 - Process

Item 44.18:
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:
TBR FINISHING DEPT. 613. Cured tires are sent to finishing Dept. 613 (TBR 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: 0EC33 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: EC35B - Control
Control Type: WET ROTOCLONE

Emission Source/Control: 0ES34 - Process

Emission Source/Control: ES35A - Process

Item 44.19:
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 and 14.

Emission Source/Control: 0EC47 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0EC59 - Control
Control Type: WET ROTOCLONE

Emission Source/Control: 0ES37 - Process

Emission Source/Control: 0ES38 - Process

Emission Source/Control: 0ES41 - Process

Emission Source/Control: 0ES46 - Process

Emission Source/Control: 0ES47 - Process

Item 44.20:
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: Cutting and buffing of tires to perform QA/QC.

Emission Source/Control: 0EC60 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 0ES49 - Process

Emission Source/Control: 0ES63 - Process

Item 44.21:
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: 0ES50 - Process

Condition 45: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 227-1.3

Item 45.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU01

Item 45.2:
Compliance Certification shall include the following monitoring:

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

1.) The boilers shall not be operated 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.

2.) 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:
a.) 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, corrective action shall be taken immediately to eliminate excess emissions.

b.) If the corrective action taken in item 2.a does not rectify the opacity problem within 24 hours, then conduct an opacity test using a certified opacity reader in accordance with EPA Method 9 (40 CFR 60, Appendix A). Conduct such a test at least once each daylight shift until corrective actions successfully rectifies the opacity problem. If the opacity continues, a Method 9 observation must be performed within 24 hours and results reported.

3.) Keep records of the above opacity monitoring, equipment and process inspections, and all corrective

actions.

4.) Report the observance of visible emissions and the substance of any corrective action, in accordance with the deviation reporting requirements in this permit.

In addition, the boilers will be operated in manner consistent with good operating & maintenance practices, thus ensuring compliance with opacity limitations. The facility maintains standard operating procedures for boilers (ES01, ES02, ES03, ES04 and ES05) which contains procedures for maintenance and any necessary calibration annually or more frequently, if appropriate. In response to opacity concerns in 1996, the facility 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; and
7. Preventative maintenance of boilers including burners and burner cones.

The operators of the boilers are licensed boiler engineers. The facility 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 the facility's insurance provider to comply with insurance requirements. Records of all maintenance procedures will be maintained and provided to the department upon request.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent

Reference Test Method: EPA METHOD 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 46: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:40CFR 63, Subpart ZZZZ

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

Emission Unit: 0-0EU01

Item 46.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
These requirements apply to the two existing emergency engines below, each rated at less than 500 HP and constructed prior to June 12, 2006:
- Firepump Engine firing Diesel Fuel, emission point 00007 and
- Backup Lighting Generator Engine firing Natural Gas, emission point 00008.

1.) Operate and maintain each engine per manufacturer's instructions or owner developed maintenance plan [§63.6625(e)].
2.) Change oil and filter every 500 hours or annually, whichever comes first [§63.6603(a), table 2d]. May use oil analysis program specified in §63.6625(j) instead of prescribed oil change frequency.
3.) Inspect hoses and belts every 500 hours or annually, whichever comes first, and replace as necessary [§63.6603(a), table 2d].
4.) On the diesel engine, inspect air cleaner every 1000 hours or annually, whichever comes first, and replace as necessary [§63.6603(a), table 2d].
5.) On the natural gas engine, inspect the spark plugs every 1000 hours or annually, whichever comes first, and replace as necessary [§63.6603(a), table 2d].
6.) Install hour meter on each engine [§63.6625(e)] and record hours of operation [§63.6655(f)].
7.) Keep records of maintenance [§63.6655(e)].
8.) Notifications are not required [§63.6645(a)(5)].

9.) Unlimited use for emergencies (e.g., power outages, fire, flood). May operate for 100 hours per year for maintenance and readiness testing [§63.6640(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 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 47: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:40CFR 63.11194(a), Subpart JJJJJJ

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

Emission Unit: 0-0EU01
Process: 002

Item 47.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Applicability of National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63 subpart JJJJJJ

The dual fuel boilers have fired only natural gas since March 21, 2014, the initial compliance date of this rule. Therefore, they meet the definition of 'gas-fired boiler' [§63.11237]. This rule does not apply to gas-fired boilers [§63.11195(e)]. However, if any boiler burns oil for more than 48 hours in a calendar year then it no longer meets the definition of 'gas-fired boiler' and becomes subject to this rule.

When a boiler becomes subject to this rule,
- Submit notification of such a change within 30 days of the change [§63.11225(g)].
- Demonstrate compliance with the rule within 180 days of the change [63.00210(h)].
- The compliance requirements of this rule are not included in this permit because the facility anticipates burning natural gas for the foreseeable future.

1.) If any boiler burns oil for more than 48 hours in a

calendar year, it will become subject to 40 CFR 63 subpart JJJJJJ.
2.) Monitor the hours each boiler burns fuel oil.
3.) Record the hours each boiler burns fuel oil.
4.) Semiannually report the hours each boiler burned fuel oil during the calendar year.

Monitoring Frequency: MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 48: Compliance by purchasing a certified engine
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:40CFR 60.4243(b)(1), NSPS Subpart JJJJ

Item 48.1:
This Condition applies to Emission Unit: 0-0EU01 Emission Point: 00006

Item 48.2:
The owner or operator of a stationary SI internal combustion engine that must comply with the emission standards specified in 40 CFR 60.4233(d) or (e) demonstrates compliance by purchasing an engine certified according to procedures specified in subpart JJJJ, for the same model year and demonstrating compliance according to one of the methods specified in 40 CFR 63.4243(a).

Condition 49: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:40CFR 60.4243(d), NSPS Subpart JJJJ

Item 49.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU01 Emission Point: 00006

Item 49.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
Emergency stationary ICE may be operated for up to 50 hours per calendar year in nonemergency situations. The 50 hours of operation in nonemergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in 40

CFR 60.4243(d)(2). Except as provided in paragraph (i), the 50 hours per year for nonemergency situations cannot be used for peak shaving or nonemergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. There is no time limit on the use of emergency stationary ICE in emergency situations.

As per (d)(3)(i), the 50 hours per year for nonemergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator;

(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

(D) The power is provided only to the facility itself or to support the local transmission and distribution system.

(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

Parameter Monitored: HOURS OF OPERATION
Upper Permit Limit: 100 hours per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL TOTAL
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2019.
Subsequent reports are due every 12 calendar month(s).

Condition 50: Compliance Certification

Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 212-1.6 (a)

Item 50.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU02

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

Item 50.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:
No facility owner or operator shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water. This permit condition applies to the following emission points:

Emission Source	Emission Point
Banbury Mixer #6	00126
Banbury Mixer #7	00144
Banbury Mixer #8	00138
Banbury Mixer #9	00140
Banbury Mixer #10	00162
Banbury Mixer #11	01H17
Banbury Mixer #12	00132
Banbury Mixers #8, #9 & 10	00160 (RTO #1)

1.) Perform daily qualitative opacity assessments of the above emission points. The observer performing the qualitative opacity assessments will be familiar with US EPA Method 22 procedures.

2.) 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. If any visible emissions are observed the owner or operator shall take the following corrective actions:

a.) 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.

b.) If the corrective action(s) taken in item 'a' above do not rectify the opacity problem within 24 hours, then conduct a visible emission observation (opacity) test using a certified opacity reader, in accordance with EPA Method 9 (40 CFR 60, Appendix A). Conduct a Method 9 test at least once per day until corrective action successfully returns the emissions to normal.

3.) Record the results of the daily visual emissions inspection, operating status of the emission point, corrective actions, and Method 9 Visible Emission Test. Such information shall be kept for five years.

4) 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 9
Monitoring Frequency: DAILY
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 51: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:40 CFR Part 64

Item 51.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU02

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

Item 51.2:
Compliance Certification shall include the following monitoring:

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

CAM for BANBURY MIXER DUST COLLECTORS

The dust collectors associated with the seven Banbury mixers in emission unit 0EU02 are subject to Continuous Assurance Monitoring (CAM) because potential emissions of particulates, prior to control, exceed the 100 tpy applicability threshold in 40 CFR Part 64. Visible emission monitoring and differential pressure monitoring are used to provide a reasonable assurance of compliance with 6NYCRR Part 212-2.4(b), which states that no facility owner or operator shall cause or allow emissions of particulate that exceed 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Particulates from the Banbury mixers are exhausted through eight cartridge filter dust collectors (D.C.) and out emission points.

Emission Source	D.C. ID	Emission Point
Banbury Mixer #6	EC06A	00126
Banbury Mixer #7	EC07A	00144
Banbury Mixer #8	EC08A	00138*
Banbury Mixer #9	EC09A	00140*
Rubber Mixer #10	EC0AA	00162*
Banbury Mixer #11	EC11A	01H17
Banbury Mixer #12	EC12A	00132
Banbury Mixer #8	EC08A	00160**
Banbury Mixer #9	EC09A	00160**
Rubber Mixer #10	EC0AA	00160**

where: D.C. = dust collector

* EP's 00138, 00140, and 00162 exhaust the dust collectors when they are not directed to the RTO.

** Dust collectors that are followed by a regenerative thermal oxidizer

CAM Program:

A.) PRIMARY INDICATOR – Visible emissions are the primary indicator. The facility shall make visible emission observations from the emission points as follows:

1.) Perform daily qualitative opacity assessments of the above emission points. The observer performing the qualitative opacity assessments will be familiar with US EPA Method 22 procedures.

2.) 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 it is considered an excursion, and owner or operator shall take the following corrective actions:

a.) 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.

b.) If the corrective action(s) taken in item 'a' above do not rectify the opacity problem within 24 hours, then conduct a visible emission observation (opacity) test using a certified opacity reader, in accordance with EPA Method 9 (40 CFR 60, Appendix A). Conduct a Method 9 test at least once per day until corrective action successfully returns the emissions to normal.

3.) Record the results of the daily visual emissions inspection, operating status of the emission point, corrective actions, and Method 9 Visible Emission Test. Such information shall be kept for five years.

4) Report the observance of visible emissions and the substance of any corrective action, in accordance with the deviation reporting requirements in this permit.

B. SECONDARY INDICATOR – The pressure differential across the filters is the secondary indicator for particulate emissions. The facility shall monitor the pressure differential across the dust collectors as follows:

1.) The facility will monitor and record pressure drop across the cartridge filters for the above emission sources on a weekly basis as an indicator that the emission control equipment is operating properly.

2.) If the pressure differential is outside the normal operating range of 0.5 to 7.0 inches of water it will be considered an excursion. An excursion will trigger immediate corrective actions, including (i) conducting visual inspection (as described under the primary indicator of this permit condition) and (ii) completing a maintenance inspection within 8 hours of the pressure differential reading.

3.) Maintenance of control equipment and calibration of differential pressure devices shall be performed per manufacturer's specifications.

4.) Records of pressure differential readings,

operating status of the dust collector, calibrations, maintenance inspections, and corrective actions and shall be kept on site for five years.

C. EMISSION COMPLIANCE TESTING - If additional corrective actions do not eliminate the excursion, an emission compliance test may be required. Such testing shall be conducted within 60 days of notification. If a stack test is required, a compliance test protocol shall be submitted to the department for approval at least 30 days before the scheduled testing, and a stack test report shall be submitted to the department within 60 days of the testing, according to 6NYCRR Part 202-1.

D. MINIMUM DATA AVAILABILITY – The minimum data availability requirement for valid data collection from the pressure differential monitor for each dust collector is 90% of the dust collector operating time, each semiannual reporting period.

E. QUALITY IMPROVEMENT PLAN (QIP) – A QIP shall be developed and implemented when the total excursions are recorded for more than 5 percent of the operating time of each emission point or each dust collector during the semiannual reported period. An exceedance of this threshold shall be reported as a deviation in the semiannual and annual compliance reports. The elements of a QIP are included in a 40 CFR PART 64.8 permit condition.

F. REPORTING – In each semiannual compliance report required by 6NYCRR 201-6.4(c)(3), the following data shall be included, as required by 40CFR 64.9(a)(2):

1.) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

2.) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

3.) A description of the actions taken to implement a QIP during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf
Reference Test Method: EPA Method 5
Monitoring Frequency: DAILY
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 52: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 212-3.1 (a)

Item 52.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU02 Emission Point: 00160
Process: 003 Emission Source: RTO01

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

Item 52.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

RTO #1 DESTRUCTION EFFICIENCY
INITIAL COMPLIANCE TEST

1.) The regenerative thermal oxidizer (RTO) #1 must operate with at least 98% destruction efficiency of VOC's or shall not exceed 20 parts per million (ppm). If the 98% destruction efficiency is not meet, then emissions shall not exceed 20 ppm. The emission concentration requirement is a separate permit condition.

2.) Within 180 days of commencing operation of the RTO, an initial compliance test must be conducted to demonstrate compliance with destruction efficiency limit. During testing the temperature of the oxidizer shall be recorded.

3.) A testing protocol shall be submitted for approval at least 30 days before the scheduled test.

4.) A test report shall be submitted within 45-days of testing.

Parameter Monitored: DESTRUCTION EFFICIENCY
Lower Permit Limit: 98 percent
Reference Test Method: EPA Method 18/25A
Monitoring Frequency: SINGLE OCCURRENCE
Averaging Method: Arithmetic average of stack test runs
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 53: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 212-3.1 (a)

Item 53.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU02 Emission Point: 00160
Process: 003 Emission Source: RTO01

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

Item 53.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

RTO #1 PPM INITIAL COMPLIANCE TEST

1.) The regenerative thermal oxidizer (RTO) #1 shall not emit more than 20 parts per million (ppm) VOC or must operate with at least 98% destruction efficiency of VOC's. If the 98% destruction efficiency is not meet, then emissions shall not exceed 20 ppm. The destruction efficiency requirement is a separate permit condition.

2.) Within 180 days of commencing operation of the RTO, an initial compliance test must be conducted to demonstrate compliance with the above limit. The temperature of the oxidizer shall be recorded during testing.

3.) A testing protocol shall be submitted for approval at least 30 days before the scheduled test.

4.) A test report shall be submitted within 45-days of testing.

Parameter Monitored: VOC
Upper Permit Limit: 20 parts per million by volume (dry)
Reference Test Method: EPA Method 18/25A

Monitoring Frequency: SINGLE OCCURRENCE
Averaging Method: Arithmetic average of stack test runs
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 54: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 231-6.5

Item 54.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU02 Emission Point: 00160
Process: 003 Emission Source: RTO01

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

Item 54.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

LAER for RTO #1 - ONGOING MONITORING
OPERATING PLAN

1.) When rubber with organo-saline coupling agent is mixed in Mixers 8 or 9 or 10, the mixer must exhaust to the RTO to control VOC emissions.

2.) Submit an operating and recordkeeping plan, for department approval, that explains how compliance with the above requirement will be demonstrated. The plan must be submitted at least 30 days before the RTO commences operation.

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 55: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 231-6.5

Item 55.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU02 Emission Point: 00160

Process: 003 Emission Source: RTO01

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

Item 55.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

LAER for RTO #1 - PHASE 1
INITIAL COMPLIANCE TEST

1.) The Lowest Achievable Emission Rate (LAER) for Regenerative Thermal Oxidizer (RTO) #1 is 3.4 lb VOC/hr when Mixers 8 and 9 are both mixing rubber with organo-sailine coupling agent. Phase 1 of the facility expansion project commences when RTO #1 commences operation or when ethanol emissions exceed 39 tons per year, which ever occurs first.

2.) Within 180 days of Mixers 8 and 9 exhausting to the RTO, an emission compliance test must be conducted to demonstrate compliance with the LAER limit above. During testing the temperature of the oxidizer shall be recorded.

3.) A testing protocol shall be submitted for approval at least 30 days before the scheduled test.

4.) A test report shall be submitted within 45-days of testing.

Parameter Monitored: VOC
Upper Permit Limit: 3.4 pounds per hour
Reference Test Method: EPA Method 18/25A
Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 56: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 231-6.5

Item 56.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU02 Emission Point: 00160

Process: 003 Emission Source: RTO01

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

Item 56.2:
Compliance Certification shall include the following monitoring:

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

LAER for RTO #1 - ONGOING MONITORING TEMPERATURE

1.) The thermal oxidizer shall operate at or above 1500 F, or the temperature recorded during compliance testing, whichever is less (1500 F was guaranteed by the manufacturer).

2.) The temperature will be recorded no less than once per hour when the mixer(s) are exhausting to the RTO.

3.) The temperature, mixing and RTO use records shall be kept for at least 5 years.

4.) Semiannually, report when the temperature did not meet the requirement in item 1, and the corrective actions taken.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1500 degrees Fahrenheit
Monitoring Frequency: Hourly when in use
Averaging Method: MINIMUM-NOT TO FALL BELOW EXCEPT DURING STARTUP/SHUTDOWN
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 57: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 231-6.5

Item 57.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU02 Emission Point: 00160
Process: 003 Emission Source: RTO01

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 57.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

LAER for RTO #1 - PHASE 2
INITIAL COMPLIANCE TEST

1.) The Lowest Achievable Emission Rate (LAER) for Regenerative Thermal Oxidizer (RTO) #1 is 5.1 lb VOC/hr when Mixers 8, 9 and 10 are all mixing rubber with organo-sailine coupling agent. Phase 2 of the facility expansion project commences when mixer 10 starts operating.

2.) Within 180 days of Mixers 8, 9 and 10 all exhausting to the RTO, an emission compliance test must be conducted to demonstrate compliance with the LAER limit above. During testing the temperature of the oxidizer shall be recorded.

3.) A testing protocol shall be submitted for approval at least 30 days before the scheduled test.

4.) A test report shall be submitted within 45-days of testing.

Parameter Monitored: VOC
Upper Permit Limit: 5.1 pounds per hour
Reference Test Method: EPA Method 18/25A
Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 58: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 212-1.6 (a)

Item 58.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU03

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

Item 58.2:

Compliance Certification shall include the following monitoring:

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

Opacity Limit for Extruding Process

1.) No facility owner or operator shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

2.) All emission sources in emission unit 0EU03 shall be operated in a manner consistent with good operating practices, thus ensuring compliance with 20% opacity limit. Proper operation and maintenance will ensure opacity compliance. The following Emission Unit 0EU03 sources do have particulate controls:
- An end cement sprayer in Dept. 224 (0ES17) exhausts through a panel filter to EP 00810,
- An end cement sprayer in Dept. 227 (0ES54) exhausts through a panel filter to EP 01010, and
- An end cement sprayer in Dept. 228 (0ES57) exhausts through a panel filter to EP 00218.

The following emission unit 0ES03 sources do not have particulate controls:
- Tread marker in Dept. 224 (0ES16) exhausts to EP 00809,
- Tread Extruder take-away conveyor in Dept. 224 (0ES18) exhausts to EP 00808,
- Tread marker (0ES56) and tread extruder take-away conveyor (0ES58) in Dept. 228 exhaust to EP 00217,
- Sidewall extruder take-away conveyor (0ES19) exhausts to EP 00406,
- Profile extruder take-away conveyor (0ES20) exhausts to EP 00213,
- Stock strip extrusion lines (ES21A) and mills (ES22A) exhaust to EP 00413,
- Inner liner extruder take-away conveyor (0Es21) exhausts to EP 00214,
- Inner liner warming mills (0ES22) exhausts to EP 00215, and
- Gum line mill (0ES26) exhausts to EP 02-19.

3.) An EPA Method 9 compliance test may be requested by the Department.

4.) Semiannually, report the compliance status of this condition according to 6NYCRR Part 201-6.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 59: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

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

Item 59.1:
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 59.2:
Compliance Certification shall include the following monitoring:

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

VOC limit for cementing tread ends together

1.) For each tread end cementing operation, discharge into the atmosphere no more than 10 grams of VOC per tire cemented for each month. [40CFR 60.542(a)(3)]

2.) Monitoring shall be conducted as required in 60.543(d):
a.) Determine the density and weight fraction VOC as specified in 60.543(c)(1).
b.) Calculate the total mass of VOC used at the affected facility for the month (Mo) as specified in 60.543(c)(2).
c.) Determine the total number of tires cemented or sprayed at the affected facility for the month (To) by the following procedure:
a.) For a trend end cementing operation, 'To' equals the number of tread or combined tread/sidewall components

that receive an application of tread end cement for the month.

b.) For a green tire spraying operation that uses water-based inside green tire sprays, 'To' equals the number of green tires that receive an application of water-based inside green tire spray for the month.

c.) For a green tire spraying operation that uses water-based outside green tire sprays, 'To' equals the number of green tires that receive an application of water-based outside green tire spray for the month.

d.) Calculate the mass of VOC used per tire cemented or sprayed at the affected facility for the month.

e.) Calculate the mass of VOC emitted per tire cemented or sprayed at the affected facility for the month.

3.) Each owner or operator of an undertread cementing operation, sidewall cementing operation, green tires spraying operation where organic solvent-based sprays are used, who seeks to comply with a specified VOC monthly usage limit shall maintain records of monthly VOC use and the number of days in each compliance period. [60.545(d)]

4.) Semiannually report each monthly average VOC emission rate that exceeds the VOC emission limit per tire or per bead. [60.546(f)(1)]. Report the actual monthly average VOC emission rate per tire or per bead.

5.) 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.

Parameter Monitored: VOC's
Upper Permit Limit: 10 grams
Monitoring Frequency: MONTHLY
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 60: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 212-1.6 (a)

Item 60.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU04

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

Item 60.2:
Compliance Certification shall include the following monitoring:

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

Opacity Limit for Calendering Process

1.) No facility owner or operator shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

2.) All emission sources in emission unit 0EU04 shall be operated in a manner consistent with good operating practices, thus ensuring compliance with 20% opacity limit. Emission Unit 0EU04 is comprised of a calendering machine (0ES27) exhausting to EP 00402, let-off splicer (ES26A) exhausting to EP 00412, a warming mill / feed mill (0ES28) exhausting to EP 00219, and a calender machine (0ES29) exhausting to 00220. There are no particulate controls on this equipment. Proper operation and maintenance will ensure opacity compliance.

3.) An EPA Method 9 compliance test may be requested by the Department.

4.) Semiannually, report the compliance status of this condition according to 6NYCRR Part 201-6.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 61: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 212-1.6 (a)

Item 61.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU05

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

Item 61.2:
Compliance Certification shall include the following monitoring:

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

Opacity Limit for Tire Building and Curing

1.) No facility owner or operator shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

2.) All emission sources in emission unit 0EU05 shall be operated in a manner consistent with good operating practices, thus ensuring compliance with 20% opacity limit. Proper operation and maintenance will ensure opacity compliance. Emission Unit 0EU05 is comprised of:
- three green tire spray booths and one tire bladder assembly station (0ES32) that exhaust out EP's 01404, 01405, 01408 and 01409. Each booth and the bladder station have dedicated emission points.

3.) An EPA Method 9 compliance test may be requested by the Department.

4.) Semiannually, report the compliance status of this condition according to 6NYCRR Part 201-6.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 62: Compliance Certification

Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 231-6.5

Item 62.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU05

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

Item 62.2:
Compliance Certification shall include the following monitoring:

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

VOC LAER for Tire Curing Presses

1.) The lowest achievable emission rate (LAER) for rubber tire curing, is 0.0029 lb VOC per pound of rubber tire cured that contains organo-silane coupler. Rubber with organo-silane couplers generate emissions of ethanol.

2.) The facility will track coupler usage and overall rubber tire production. The facility will calculate the average VOC per pound of rubber tire cured that contains organo-silane coupler using this data in a spreadsheet.

3.) The VOC per pound of rubber tire cured will be calculated monthly and used to calculate a 12-month rolling average.

4.) The monthly and rolling 12-month rolling averages will be submitted annually.

Parameter Monitored: VOC
Upper Permit Limit: 0.0029 pounds
Monitoring Frequency: MONTHLY
Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2019.
Subsequent reports are due every 12 calendar month(s).

Condition 63: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

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

Item 63.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU05

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

Item 63.2:
Compliance Certification shall include the following monitoring:

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

Inside Green Tire Spray VOC Limit

1.) For each inside green tire spraying operation where only water-based sprays are used, discharge into the atmosphere no more than 1.2 grams (0.0026 lb) of VOC per tire sprayed with an inside green tire spray for each month, [60.542(a)(5)(i)]. Where a 'water-based green tire spray' contains 12 percent or less, by weight, of VOC as sprayed; as defined in 60.541(a).

2.) The facility complies with the above limit by applying only water based sprays containing less than 1.0 percent, by weight, of VOC, to the inside of green tires. [60.543(b)(4)]

3.) Obtain formulation data or the results of Method 24 analysis annually to verify the VOC content of each green tire spray material, provided the spraying formulation has not changed during the previous 12 months. If the spray material formulation changes, formulation data or Method 24 analysis of the new spray shall be conducted to determine the VOC content of the spray. [60.543(b)(4)]

4.) Maintain records of formulation data or the results of Method 24 analysis conducted to verify the VOC content of the spray. [60.545(f)]

5.) Submit annually the green tire spray 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 of the change.

[60.546(j)]

Parameter Monitored: VOC's
Upper Permit Limit: 1.2 grams
Reference Test Method: EPA Method 24
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 64: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

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

Item 64.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU05

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

Item 64.2:
Compliance Certification shall include the following monitoring:

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

Outside Green Tire Spray VOC Limit

1.) For each outside green tire spraying operation where only water-based sprays are used, discharge into the atmosphere no more than 9.3 grams (0.021 lb) of VOC per tire sprayed with an outside green tire spray for each month, [60.542(a)(5)(i)]. Where a ‘water-based green tire spray' contains 12 percent or less, by weight, of VOC as sprayed; as defined in 60.541(a).

2.) The facility complies with the above limit by applying only water based sprays containing less than 1.0 percent, by weight, of VOC, to the outside of green tires. [60.543(b)(4)]

3.) Obtain formulation data or the results of Method 24 analysis annually to verify the VOC content of each green

tire spray material, provided the spraying formulation has not changed during the previous 12 months. If the spray material formulation changes, formulation data or Method 24 analysis of the new spray shall be conducted to determine the VOC content of the spray. [60.543(b)(4)]

4.) Maintain records of formulation data or the results of Method 24 analysis conducted to verify the VOC content of the spray. [60.545(f)]

5.) Submit annually the green tire spray 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 of the change. [60.546(j)]

Parameter Monitored: VOC's
Upper Permit Limit: 9.3 grams
Reference Test Method: EPA Method 24
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 65: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 212-1.6 (a)

Item 65.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU06

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

Item 65.2:
Compliance Certification shall include the following monitoring:

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

Opacity Limit for Tire Finishing and Buffing

Operations

1.) No facility owner or operator shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

2.) All emission sources in emission unit 0EU06 shall be operated in a manner consistent with good operating practices, thus ensuring compliance with 20% opacity limit. Emission Unit 0EU06 is comprised of:
- a pedestal grinder (0ES34) exhausting through a cyclone to EP 00812,
- MTR uniformity tire grinder (0ES35A) exhausting through a wet rotoclone (EC35B) to EP 01011,
- Six tire buffing machines (0ES37, 0ES38, ES41 and 0ES46) exhaust through a wet rotoclone (0EC59) to EP 01312, and
- 4 O/E ASM machines (0ES47) exhaust through 4 Torit dust collectors (0EC47), which all exhaust out EP 01406 (4 control devices into 1 EP).
Proper operation will ensure opacity compliance.

3.) An EPA Method 9 compliance test may be requested by the Department.

4.) Semiannually, report the compliance status of this condition according to 6NYCRR Part 201-6.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 66: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 212-2.4 (b)

Item 66.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU06

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 66.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

Particulate Limit for Tire Finishing and Buffing Operations

1.) No facility owner or operator shall cause or allow emissions of particulate that exceed 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

2.) All emission sources in emission unit 0EU06 shall be operated in a manner consistent with good operating practices, thus ensuring compliance with above particulate limit.

3.) The facility will monitor the four Torit dust collectors (0EC47) that exhaust 4 O/E ASM machines (0ES47) by routinely performing visual inspections of the body of the dust collectors during maintenance activities. The dust collection devices are emptied weekly. By design, the filters must be seated properly to close the filter casing on the dust collectors. This ensures that there are no leaks around the filters. The maintenance department performs preventative maintenance procedures at least semiannually. Records of maintenance are kept on file and available for review. Proper maintenance will ensure compliance.

4.) The following design, maintenance and inspection activities will ensure the rotoclones are operating properly to minimizing particulate emissions. The MTR uniformity tire grinder (0ES35A) exhausts through a wet rotoclone (EC35B) to EP 01011. Six tire buffing machines (0ES37, 0ES38, ES41 and 0ES46) exhaust through a wet rotoclone (0EC59) to EP 01312.

a.) The rotoclones have a low water cut-off switches, so they can’t operate if the water level is not sufficient for proper operation.

b.) During maintenance activities the rotoclones will be visually inspected.

c.) The wet rotoclone solids are continuously emptied by use of a drag out chain.

d.) Semiannually the maintenance staff performs preventative maintenance.

e.) Repairs and corrective actions are made promptly.

5.) The department may request emission compliance testing using EPA Method 5.

6.) Semiannually report the compliance status of this condition according to 6NYCRR Part 201-6. The results of any emission compliance test shall be submitted within 60 days of testing.

Upper Permit Limit: 0.050 grains per dscf
Reference Test Method: EPA Method 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 67: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 212-1.6 (a)

Item 67.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU07

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

Item 67.2:
Compliance Certification shall include the following monitoring:

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

Opacity Limit for Tire Section Grinders and Band Saw

1.) No facility owner or operator shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

2.) All emission sources in emission unit 0EU07 shall be operated in a manner consistent with good operating practices, thus ensuring compliance with 20% opacity

limit. Emission Unit 0EU07 is comprised of the following emission sources, emission control devices and emission points as follows: one band saw (0ES49) and two tire section grinders (0ES063) exhaust particulates through a cyclone (0EC60) to EP 00614. A hood surrounding the band saw vents fumes to EP 00615. Proper operation will ensure opacity compliance, this includes performing a visual inspection of the cyclone body and equipment during maintenance activities.

3.) An EPA Method 9 opacity compliance test may be requested by the Department.

4.) Semiannually, report the compliance status of this condition according to 6NYCRR Part 201-6.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: WHEN THE SOURCE IS OPERATING
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 68: Compliance Certification
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable Federal Requirement:6 NYCRR 212-1.6 (a)

Item 68.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU08

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

Item 68.2:
Compliance Certification shall include the following monitoring:

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

Opacity Limit for ERB (electron processing system)

1.) No facility owner or operator shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any

process emission source or emission point, except for the emission of uncombined water.

2.) All emission sources in emission unit 0EU08 shall be operated in a manner consistent with good operating practices, thus ensuring compliance with 20% opacity limit. Emission Unit 0EU08 is comprised of the following emission sources, emission control devices and emission points as follows: one ERB system (0ES50) which exhausts through EP 00410. There are no emission controls. 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 facility.

3.) An EPA Method 9 compliance test may be requested by the Department.

4.) Semiannually, report the compliance status of this condition according to 6NYCRR Part 201-6.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: WHEN THE SOURCE IS OPERATING
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2018.
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: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department 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 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 and maintained;
(3) During the period of the emergency the facility owner 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 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 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: **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 69: Contaminant List
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable State Requirement:ECL 19-0301

Item 69.1:
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: 000075-09-2
Name: DICHLOROMETHANE

CAS No: 000091-20-3
Name: NAPHTHALENE

CAS No: 000108-10-1
Name: 2-PENTANONE, 4-METHYL

CAS No: 000108-88-3
Name: TOLUENE

CAS No: 000110-54-3
Name: HEXANE

CAS No: 001330-20-7
Name: XYLENE, M, O & P MIXT.

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

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

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

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

Condition 70: Malfunctions and start-up/shutdown activities
Effective between the dates of 01/23/2018 and 01/22/2023

Applicable State Requirement:6 NYCRR 201-1.4

Item 70.1:
(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, 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 department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that

such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

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

Condition 71: Compliance Demonstration
Effective between the dates of 01/23/2018 and 01/22/2023

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

Item 71.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0EU01
Process: 002

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

Item 71.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

Particulate Limit for Boilers While Burning Oil

1.) No person shall cause or allow an emission into the outdoor atmosphere of particulates in excess of 0.20 pound per million Btu heat input using oil. This limit applies to the boilers firing #6 (residual) fuel oil. Compliance testing shall be conducted once a permit term.

2.) Submit to the Department an acceptable protocol for the testing of particulate emissions at least 30 days in advance of the proposed test date and the Department given an opportunity to witness the test.

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

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

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

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.20 pounds per million Btus
Reference Test Method: EPA 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 72: Compliance Demonstration
Effective between the dates of 01/23/2018 and 01/22/2023

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

Item 72.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0EU01
Process: 002

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

Item 72.2:
Compliance Demonstration shall include the following monitoring:

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

1.) No person shall cause or allow an emission into the outdoor atmosphere of particulates in excess of 0.20 pound per million Btu heat input using oil. This applies to emission points 00001, 00003 and 00005 which exhaust the boilers.

2.) The facility has demonstrated compliance with the above limit by utilizing a published particulate emission factor from EPA AP-42 for no. 6 fuel oil, together with heating value and sulfur content of the fuel oil for boilers 1, 2, 5 and 6. This is intended to be a worst case calculation. Note that a particulate limitation does not apply when combusting natural gas, which is also utilized as a primary fuel.

3.) Compliance Demonstration
Particulate emission factor from AP-42, Section 1.3-2, table 1.3-1:
PM pounds per 1000 gallon = 9.19(S) + 3.22
Where S = % sulfur content, if sulfur content is 1% then S = 1
6NYCRR Part 225-1.2(e) limits the sulfur content to 0.50 % by weight, so S = 0.50
PM = 9.19(0.50) + 3.22 = 7.815 lbs/1000 gallons =

0.0078 lbs/gallon

Where one gallon of no. 6 fuel oil contains 138,000 Btu.
Calculate the pounds of particulate/MMBtu:
PM = 0.0078 lbs/gallon x 1 gal/138,000 Btu x 1,000,000 Btu/ MMBtu
PM = 0.0566 pounds particulate/MMBtu

This demonstrates compliance with the 0.20 lb particulate/MMBtu limit in 227-1.2(a)(2).

4.) This requirement is associated with emission unit EU01. Contained within EU01 are emission sources ES01, ES02, ES03, ES04. ES01 and ES02 exhaust to emission point 00001, ES03 and ES04 exhaust to 00003, and ES01, ES02, ES03, ES04 can all exhaust to emission point 00005. This limit not applicable to ES05, boiler no. 7, because it does not burn oil.

5.) A stack test may be required to demonstrate compliance if opacity exceedances occur.

6.) Sulfur in fuel oil records must be kept on site. Documentation will be submitted to the department upon request.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: NUMBER 6 OIL
Parameter Monitored: SULFUR CONTENT
Upper Permit Limit: 0.50 percent by weight
Reference Test Method: ASTM Methods
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 7/30/2018.
Subsequent reports are due every 6 calendar month(s).