RESPONSE TO COMMENTS

FIRESTONE BUILDING PRODUCTS COMPANY, LLC
PERMIT #0698-AR-14
AFIN: 50-00006

On August 3, 2012, the Director of the Arkansas Department of Environmental Quality gave notice of a draft permitting decision for the above referenced facility. During the comment period, written comments on the draft permitting decision were submitted by the facility. The Department's response to these issues follows.

Note: The following page numbers and condition numbers refer to the draft permit. These references may have changed in the final permit based on changes made during the comment period.

Comment #1:

Condition 36, reads "The permitee shall not use more than 17,520,000 pounds of white tape compound at the White Seam Tape (SN-317) during any consecutive 12-month period."

The raw materials are compounded and extruded onto the backing in the white seam tape process – compound is not brought in as raw material. The word "use" should be replaced with the word "produce."

Response to Comment #1:

Specific Condition has been updated as requested, and now reads as:

> 36. The permittee shall not produce more than 17,520,000 pounds of white tape compound at the White Seam Tape (SN-317) during any consecutive 12-month period. [Regulation 18, §18.1004; Regulation 19, §19.705; and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

ADEQ

A R K A N S A S
Department of Environmental Quality

September 18, 2012

Bruce Yelverton
Safety & Environmental Manager
Firestone Building Products Company, LLC
P.O. Box 710
Prescott, AR 71857

Dear Mr. Yelverton:

The enclosed Permit No. 0698-AR-14 is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application initially received on 7/2/2012.

After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 0698-AR-14 for the construction, operation and maintenance of an air pollution control system for Firestone Building Products Company, LLC to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, Regulation 8, within thirty (30) days after service of this decision.

The applicant or permittee and any other person submitting public comments on the record may request an adjudicatory hearing and Commission review of the final permitting decisions as provided under Chapter Six of Regulation No. 8, Administrative Procedures, Arkansas Pollution Control and Ecology Commission. Such a request shall be in the form and manner required by Regulation 8.603, including filing a written Request for Hearing with the APC&E Commission Secretary at 101 E. Capitol Ave., Suite 205, Little Rock, Arkansas 72201. If you have any questions about filing the request, please call the Commission at 501-682-7890.

Sincerely,

Mike Bates
Chief, Air Division

Enclosure

ADEQ
MINOR SOURCE
AIR PERMIT

Permit No. : 0698-AR-14

IS ISSUED TO:

Firestone Building Products Company, LLC
1406 Highway 371 North
Prescott, AR 71857
Nevada County
AFIN: 50-00006

THIS PERMIT IS THE ABOVE REFERENCED PERMITTEE'S AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Mike Bates
Chief, Air Division

September 10, 2012
Date

Table of Contents

List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
No.	Number
NO_x	Nitrogen Oxide
PM	Particulate Matter
PM_{10}	Particulate Matter Smaller Than Ten Microns
SO_2	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Section I: FACILITY INFORMATION

PERMITTEE:	Firestone Building Products Company, LLC
AFIN:	50-00006
PERMIT NUMBER:	0698-AR-14
FACILITY ADDRESS:	1406 Highway 371 North Prescott, AR 71857
MAILING ADDRESS:	P.O. Box 710 Prescott, AR 71857
COUNTY:	Nevada County
CONTACT NAME:	Bruce Yelverton
CONTACT POSITION:	Safety & Environmental Manager
TELEPHONE NUMBER:	870-887-2673
REVIEWING ENGINEER:	Joseph Hurt
UTM North South (Y):	Zone 15: 3741252.77 m
UTM East West (X):	Zone 15: 462179.42 m

Section II: INTRODUCTION

Summary of Permit Activity

Firestone Building Products Company owns and operates a rubber roofing manufacturing facility located in Prescott, Arkansas. With this permitting action Firestone Building Products requested to install a new white seam tape line (SN-317). The total permitted emission increases include 1.6 tpy of PM/PM_{10}, 0.2 tpy of VOC, 0.08 tpy of Hexane, 0.01 tpy of Methylene Chloride, and 0.04 tpy of Toluene.

Process Description

Firestone manufactures rubber roofing materials, and other roofing-related products as well as white rubber tire stock used in the production of white-wall tires.

The two primary production areas from which emissions occur are the white line and the black line. The white line yields either finished product or product to be used for white roofing materials. From the black line, output is either finished product, or it is material sent to one of the four secondary product lines: Comerio, Z-Calender, Flashing, or Tape Line.

The tape line produces rubber tape used to seam pieces of rubber roofing together. This line is fairly independent of the other production processes. The compound processed at the black tape line was mixed at the K1 and K2 Banbury mixers.

The following description details the operations that take place for each production line with respect to the air emission sources associated with each, reflecting the changes requested by this modification application. For permitting purposes, the processes have been organized into the following sections:

- Raw materials unloading
- Black line
- White line
- Comerio line
- Z-Calender line
- Flashing line
- Tape line

Raw Materials Unloading

The facility uses carbon black as a raw material. Carbon black is received by rail. Carbon black can be unloaded from the rail cars by a screw auger and transferred to one of three storage tanks by a pneumatic transfer system. Emissions from the pneumatic transfer system are controlled by a dust collector (SN-301A). The carbon black is loaded into one of three storage tanks, Tank No. 111 (SN-201), Tank No. 273 (SN-101A) and Tank No. 274 (SN-101B). Each tank releases

emissions by the displacement of air when the tanks are filled. The emissions from the tanks are controlled by fabric filters.

Carbon black can also be unloaded from the rail cars by a pneumatic transfer system into one of two storage tanks, Tank No. 271 (SN-1A) and Tank No. 272 (SN-1B). Emissions from each storage tank are controlled by fabric filters. Emissions from the pneumatic transfer system are controlled by a fabric filter identified as SN-304.

Occasionally, carbon black may have to be transferred back to a railcar from the storage tanks. Typically, this occurs because the carbon black does not meet specifications. In the event that carbon black is transferred back to a railcar, emissions from the transfer are controlled by a dust collector (SN-17A).

Clay is received by rail car and is unloaded into one of two silos by a pneumatic transfer system. Emissions from the displacement of air when loading the silos and from transferring the clay are controlled by dust collectors located on top of each clay silo (SN-307 and SN-308). Like carbon black, occasionally, a load of clay may be back-loaded onto a rail car. Emissions from the loading of clay are controlled by a dust collector (SN-311) and the emissions from the back loading of clay are controlled by a dust collector (SN-310).

Oil is received by truck or by rail car and is stored in five storage tanks (previously permitted as SN-130, SN-131, SN-132, SN-133, and SN-160). This oil is distributed to operations based on product formulation.

Black Line

The black line operations begin with raw materials, which include carbon black, clay, process oil, polymer, and pigments. The black line operation has two separate process lines, identified as K-1 and K-2. Each process line includes a Banbury mixer with three surge bins. The three surge bins store the two types of carbon black, and clay separately.

Carbon black is transferred from storage tanks to a vessel. When the vessel is filled, the carbon black is transferred pneumatically to the surge bins located on the roof. Emissions from the transfer of carbon black from the storage tanks to the vessel are controlled by a dust collector (SN-17B). Clay is transferred from the storage tanks by a pneumatic transfer system directly to a surge bin. Each of the six surge bins (three per Banbury mixer) has an emission point with a dust collector to control pollutant emissions. Each process line, raw material, and source number for the surge bins is outlined below:

Process Line	Raw Material	Source No.
K-1	Carbon Black	SN-18A
	Carbon Black	SN-305
	Clay	SN-309B

Process Line	Raw Material	Source No.
K-2	Carbon Black	SN-18B
	Carbon Black	SN-118
	Clay	SN-309A

Polymer, oil, and pigments are weighed. Emissions from the weighing operations are also controlled by dust collectors (SN-02A and SN-02B for the K1 line, and SN-102 for the K2 line).

After all of the materials have been weighed, a computer determines if the weight of each of the raw materials is acceptable. If the mix meets the criteria specified in the computer, the raw materials are charged into the Banbury mixer. The mixer tears and pulls the materials, blending them into a rubbery mass. Each Banbury mixer has an inlet and an outlet exhaust, and emissions are controlled by dust collectors (SN-03 for the K1 line, and SN-103 and SN-104 for the K2 line).

After mixing, the mixture drops onto the drop mill. Emissions from the drop mill are controlled by dust collectors (SN-03 for the K1 line, and SN-104 for the K2 line). The drop mill presses the raw product out into a rough sheet. The sheet passes to a slab mill, where it is then pressed into a more refined sheet or slab. The slab rubber passes through a dip tank, where it receives a light coating of a soapy substance called slab dip. Emissions from the slab mill and the dip tank are uncontrolled; they escape the building through a vent fan (previously permitted as SN-09 for the K1 line and SN-109 for the K2 line).

After the slab is dipped, it is cooled and allowed to air dry on a festoon cooler. Then, a wig wag folds the rubber onto a pallet for storage. There are no emissions from the festoon cooler or the wig wag.

Both the K1 and K2 lines make the same product and function in the same manner. Slab rubber may be passed through either line, or both of the Banbury mixers more than once. The number of passes is dependent upon the type or quality of material being produced.

White Line

The white line works in the much the same way as the black line. The difference is that the end product is white slab rubber instead of black. Polymer, pigments, titanium dioxide, and mineral oil are added to the weigh hopper by hand (all raw materials are weighed by hand on the white line). Emissions from the pigment bins on the white line are controlled by a dust collector (SN-202). When the computer approves of the mix, the materials are added to the No. 11 Banbury mixer. The inlet and outlet exhaust from the Banbury mixer are also controlled by the dust collector at SN-202.

After mixing, the raw white rubber drops onto a drop mill where it is pressed into a rough strip. Emissions from the drop mill are discharged through the dust collector at SN-205. The rough strip of white rubber passes through the slab mill, where the rubber is pressed into a refined slab.

The rubber then passes through a dip tank. Emissions from the slab mill are vented through the dust collector at SN-205. Emissions from the slab dip tank are uncontrolled (previously permitted as SN-115). The slab rubber is cooled and allowed to air dry on a festoon. After cooling, a wig wag folds the white slab stock onto a pallet.

Comerio Calender Line

One type of black rubber roofing material produced at the facility is a two-ply material made entirely of rubber. This product is produced on the Comerio calender line. Slab material is fed into one of two Troester extruders (SN-13). The Troesters blend the product and increase the temperature by bending and breaking the material. The material is extruded onto a conveyor that delivers the stock to the calender bank. Emissions from the Troesters (SN-13) are uncontrolled.

The Comerio calenders the stock into a wide two-ply sheet of rubber roofing material. Emissions from the Comerio calender are uncontrolled (SN-14). The wide strip of material is picked up by a vacuum conveyor and is then transferred to an assembly machine. The assembly machine splices the strips together. This is accomplished by overlapping the strips, and then pressing the seam with a splice beam. The product is then wound up on a roll. Approximately ten percent of the material from the calender does not meet quality specification and is returned to the extruders for a second pass through. The quality rejects are sent to the shredder to shred the material so that it can be worked into the extruders.

As the product is rolled, it is dusted with mica dust to prevent it from sticking together. A duster applies the mica dust to the product as it is taken up on the roll. The emissions from the duster unit are controlled by a dust collector (SN-07). The product is then wrapped in plastic wrap and stacked on a transfer cart. Dust emissions occur as a result of the wrapping the product in plastic and those emissions are controlled by a dust collector (SN-306).

When the transfer cart is loaded, the product is placed in an autoclave to cure. Black line rubber products are cured in one of seven autoclaves. The autoclaves incorporate steam, heat, and pressure to cure the rubber. The process is basically a vulcanization of the product. Two natural gas boilers are used to produce steam for the autoclaves and to provide some steam heat inside the plant. The emissions from the boilers are uncontrolled (SN-16A and SN-16B). Emissions from the autoclaves escape to the atmosphere from a vent on top of each unit. When the pressure and temperature inside of the autoclave reach set points, a valve opens and allows the steam and compressed air to escape. The emissions are uncontrolled (SN-08A-G).

After the curing, or vulcanization process, the rubber is checked for quality. If it passes the quality analysis, it is ready for packaging and shipment. .

Z-Calender Line

The other type of black rubber roofing material produced at the facility is a two-ply rubber material that has nylon fabric between the two layers. This product is made on the Z-Calender line.

The Z-Calender line follows much the same process as the Comerio calender line. However, there is no re-work stock used in the Z-Calender process. Slab stock is fed into one of two Troester extruders (SN-323A and SN-323B). The Troesters blend the slab stock and bring it up to temperature. Emissions from the Troesters are uncontrolled. The stock is extruded from the Troesters to the calender bank. The Z-calender presses the stock into a two-ply sheet of rubber roofing material. Emissions from the Z-Calender are controlled by a dust collector (SN-114).

Nylon fabric is placed between the two layers, and the product is pressed together. The product then passes over a cooling mill, and is dusted with mica dust by the Z-line duster. Emissions from the Z-line duster are controlled by a collector (SN-302). Bags of mica dust are manually added to the duster. Spilled mica dust is cleaned off the floor with a vacuum cleaning unit, and emissions are controlled by a fabric filter (SN-116).
After the material is pressed and dusted, a wind-up unit rolls the product onto a master roll. Emissions from the wind-up unit are controlled by a dust collector (SN-302). The master roll is sent to a wrapping unit, where it is split into shorter rolls. Emissions from the wrapping unit are controlled by a dust collector (SN-303). The rolls are then sent to one of the autoclaves (SN-08A-F) for curing. After curing, the product is inspected for quality. If the product passes the quality inspection, it is ready for shipment.

Flashing Line

The flashing line produces black rubber flashing material that is used to line the edges of a rubber roof. The flashing material is shipped uncured, because the curing process takes place on the roof after the material has been installed. Slab stock is loaded into a breakdown mill (SN-206) to blend and heat the material. The product then passes onto a feed mill (SN-207), where it is pressed into a rough strip. Emissions from the break down mill and feed mill are uncontrolled. The product then passes through a flashing calender (SN-330), where it is pressed into a strip and laminated onto a polyliner. Emissions from the flashing calender are uncontrolled. The product passes over a cooling mill and is taken up on a wind-up unit. The product passes through a slitter to cut it to its proper size. The strips are wound up and packaged for shipping.

Tape Line

The tape line produces a paper-backed rubber tape used to seam together pieces of rubber roofing. The process involves mixing rubber and oils. Emissions from mixers are controlled by a baghouse (SN-312). There are two storage tanks (previously permitted as SN-314A and SN-314B) that store process oil for the tape line. Emissions from the storage tanks are uncontrolled. After mixing, the product goes to an extruder that forms it into strips. A paper backing is added, and the tape product is wound up and placed into an electric cure oven (SN-313). The product is split into tape rolls and packaged for shipping.

Miscellaneous Emissions Sources

There are several miscellaneous sources at the facility. Ink and paint are used in various applications throughout the facility. These emissions are uncontrolled (SN-501).

Two primer and laminating machines apply primer to a rubber strip. Two primer and laminating machines apply a primer to the rubber "tape". The primer air dries and the rubber strip "tape" is then rolled up by the laminating machine. VOC emissions from both the primer machines are uncontrolled emissions (SN-315).

The Pre-Tape Line process (SN-316) is the process of applying a primer and tape to the EPDM membrane. This process can be conducted manually by rolling out the EPDM membrane onto the floor, manually rolling a 6 inch wide strip of primer the length of the membrane, and then adhering seam tape to the primed area. Primer can also be applied by threading the EPDM membrane through the pre-tape machine, where the primer is applied, and the seam tape is adhered by an automated process.

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective June 18, 2010
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective July 9, 2012

Total Allowable Emissions

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	27.9	47.7
PM_{10}	27.9	47.7
SO_2	0.2	0.4
VOC	11.6	32.6
CO	12.6	55.2
NO_x	15.0	65.8
Allyl Chloride	0.08	0.03
Hexane	2.31	9.62

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
Methanol	0.36	1.33
Methylene Chloride	1.13	4.41
Toluene	2.26	4.91
Beryllium	2.00E-06	0.02
Chromium	4.00E-04	0.02

Section III: PERMIT HISTORY

Permit No. 392-A was issued to Prescott Industrial Products on January 6, 1977. This was the initial air permit for the existing facility. At this time the plant was producing rubber hose for use in automotive radiators and railroad brakes. This permit allowed for the installation of one additional baghouse for improved control of carbon black emissions. The new baghouse was similar to one already in operation at the plant. Two oil fired boilers, each rated at 50,000 lb/hr of steam, were also identified as emission sources at this time. Permitted emission rates were quantified only for the baghouses at 0.017 lb/hr of particulates.

Permit No. 493-A was issued to Prescott Industrial Products on October 25, 1978. This permit was a modification to Permit No. 392-A. This modification allowed for the installation of a facility to unload carbon black from incoming railcars. All transfer points were completely enclosed and routed through a negative pressure system to an existing baghouse for PM emissions control. Emissions associated with the new installation were quantified at 0.1 lb/hr.

Permit No. 698-A was issued to Firestone Tire and Rubber on January 28, 1983. This permit was a modification to Permit No. 493-A. This modification allowed for the conversion of the plant to the manufacture of rubber roofing materials. Emissions in this permit were quantified at 17.87 lb/hr PM, 23.46 lb/hr of hydrocarbons, and 57.0 lb/hr SO_2.

Permit No. 698-AR-1 was issued to Firestone Building Products, Co. on June 20, 1989. This modification was issued in order to allow for the installation of a second rubber roofing production line identical to the existing line. The primary pollutants from the production line were identified as VOC and PM. Additionally, in this modification, the facility was limited to burning only natural gas in the boilers except during periods of natural gas curtailment, at which time No. 6 fuel oil could be used. Usage of No. 6 Fuel Oil was limited to a maximum of 2,000,000 gallons per year. Emissions in this permit were quantified at 23.25 lb/hr PM, 45.8 lb/hr VOC, 0.05 lb/hr SO_2, 10.64 lb/hr NO_x, and 2.66 lb/hr CO.

Permit No. 698-AR-2 was issued to Firestone Building Products, Co. on June 6, 1995. This modification was issued in order to allow for the addition of a tape line, an increase in raw material storage capacity, and the addition of a new bulk transfer system. Limits on the usage of materials and the hours of operation of the boilers were established in this modification to limit annual emissions. Emissions in this permit were quantified at 51.7 tpy PM/PM_{10}, 0.4 tpy SO_2, 82.3 tpy VOC, 15.1 tpy CO, and 60.9 tpy of NO_x.

Permit No. 698-AR-3 was issued to Firestone Building Products, Co. on July 31, 1997. This modification was issued in order to allow for the installation of a primer machine. Emissions were quantified at 51.7 tpy PM/PM_{10}, 0.4 tpy SO_2, 88.7 tpy VOC, 15.1 tpy CO, and 60.9 tpy of NO_x.

Permit No. 698-AR-4 was issued to Firestone Building Products, Inc. on March 23, 1998. This modification was issued in order to allow for an increase in allowable annual usage of inks and cleaners from 185 gallons per year to 370 gallons per year. Emissions in this permit were

quantified at 51.7 tpy of PM/PM_{10}, 0.4 tpy of SO_2, 89.4 tpy of VOC, 15.1 tpy of CO, and 60.9 tpy of NO_x. Total HAP emissions were quantified at 14.81 tpy with the largest single HAP emissions attributed to benzene (3.19 tpy) and toluene (2.63 tpy).

Permit No. 698-AR-5 was issued to Firestone Building Products, Inc. on June 14, 2002. This modification to the minor source air permit for this facility was issued in order to allow for an increase in the production through the primer application machine (SN-315). This increase was accompanied by the installation of a thermal oxidizer to control VOC emissions from the primer application process. The addition of the thermal oxidizer allowed the facility to maintain its minor source status despite the production increase. The primer machine was permitted to emit any HAP with a TLV greater than or equal to 45 mg/m^3 with this modification.

Additionally, a new carbon black loading system was installed in order to allow for more efficient unloading of railcars entering the facility. There was no permitted emissions increase associated with the upgrade in the carbon black unloading system. The new system was expected to generate fewer emissions than the old system, but permitted limits remained unchanged. Total criteria emission limitations at this time were quantified at 51.7 tpy PM/PM_{10}, 0.4 tpy SO_2, 85.3 tpy VOC, 15.1 tpy CO, and 60.9 tpy NO_x. Total HAP emissions were quantified at 14.53 tpy, with the largest single HAP emissions attributed to benzene (3.27 tpy), xylene isomers (2.27 tpy), and toluene (2.94 tpy).

Permit No. 698-AR-6 was issued to Firestone Building Products, Inc. on August 21, 2003. This modification to the Minor Source Air Permit for the facility was issued in order to allow for the installation of a second primer machine, to be controlled by the existing thermal oxidizer at the plant (SN-315). In addition to the installation of the new primer machine, this modification allowed for an increase in the allowable VOC content of primer materials used in the two primer machines, as well as a slight increase in the maximum daily primer usage of primer at the machines. The new daily primer usage limitation was 28.0 gallons of primer per day. The new maximum VOC content for the primer materials was limited to 6.62 lb VOC per gallon of primer. Permitted emission limitations for the facility were quantified at 51.7 tpy of PM/PM10, 0.4 tpy SO2, 86.3 tpy VOC, 15.1 tpy CO, 60.9 tpy NOx, 3.27 tpy benzene, 2.27 tpy xylene, and 2.94 tpy toluene. Other HAPs and/or air contaminant limits were permitted at levels less than 1.0 tpy.

Permit No. 0698-AR-7 was issued to Firestone Building Products, Inc. on May 13, 2005. This modification to the Minor Source Air Permit for this facility was issued in order to allow for the following changes at the plant.

1. An increase in the allowable daily usage of solvent at the primer operation (SN-315) from 28 to 40 gallons per day,
2. An increase in the allowable VOC content of inks and cleaners used at the facility from 6.66 lb/gal to 7.0 lb/gal,
3. The addition of an insignificant emission source, the "Seam Tape Testing Lab Vent,"
4. The installation of a sixth autoclave (SN-08F),

5. An increase in the maximum allowable rubber processed through the K-1 and K-2 mixers from 316 million pounds per year to 432 million pounds per year, and
6. A change in the emission factors used to permit the rubber mixing operations. These operations had previously been permitted based on factors developed by the rubber manufacturer's association (RMA). The facility performed stack testing on the K-2 mixer in 1995 and has requested that those stack test results be the basis for permitted limits for PM/PM_{10} and VOC. The tested emission rates were multiplied by a 25% safety factor in order to set the permitted limits. These test factors are lower than the RMA factors, and result in lower emission estimates from the K1 and K2 mixers.
7. The removal of the K2 drop mill (SN-120) as a separate emission point. This source still exists within the plant, but emissions are now routed to the atmosphere through the K2 discharge stack (SN-104).

Permit No. 0698-AR-8 was issued to Firestone Building Products, Inc. on January 19, 2006. This modification to the Minor Source Air Permit for this facility was issued to delay compliance testing of the K-1 and K-2 Banbury Mixers' baghouses until, but no later than, June 15, 2006. By that date, the existing K-1 Mixer baghouses (SN-03, SN-04 and SN-20) will be removed and replaced with a single new baghouse (SN-03). All K-1 Mixer emissions will be routed through the new baghouse; therefore, SN 04 and SN-20 will be voided. The existing K-2 Mixer baghouses (SN-103 and SN-104) will also be removed and replaced with new baghouses. Additionally, Firestone received a Consent Administrative Order to use a raw rubber product, recently modified by a third party. The modified raw rubber product will be studied and testing completed during this delayed time period. Emissions associated with the existing baghouses are: 5.5 tpy of PM, 5.5 tpy PM_{10}, and 19.7 tpy VOC. There will be no change in permitted emissions from the facility as a result of the replacement of these baghouses. All production rates associated with the mixers will remain as currently permitted.

Permit No. 0698-AR-9 was issued to Firestone Building Products, Inc. on December 11, 2006. This permitting action increased the permitted VOC, Hexane, and total HAP emissions in response to the Consent Administrative Order issued on October 28, 2005. The increases resulted from the use of an Exxon EPDM polymer. The Exxon EPDM polymers produced greater VOC emissions due to a change in the production process of these polymers, which is supplied by a third party. The increases included an additional 4.0 tpy of VOC and 7.76 tpy of Hexane, with total HAP emissions increasing from 17.03 tpy to 24.79 tpy. Additionally, Firestone Building Products increased the daily solvent usage at the primer machines (SN-315), from 40 gallons per day to 60 gallons per day, without increasing the solvent's annual usage.

Permit No. 0698-AR-10 was issued on August 3, 2010. This permitting action allowed the facility to use solvents containing no HAPs at SN-315, and authorized a new procedure, Quick Prime Plus (SN-316), which entailed rolling out EPDM membrane and subsequently manually rolling with a primer. The total permitted emissions increases included 6.8 tpy of VOC, 0.1 tpy of PM10, and 1.41 tpy of Toluene. The Primer Machine HAP emissions were removed with this permitting action. Additionally, Firestone added 4 cooling towers to the Insignificant Activities list.

Permit 0698-AR-11 was issued on June 2, 2011. This permitting action allowed the addition of a devulcanization process to the Insignificant Activities list. There were no permitted emission changes with this Administrative Amendment.

Permit 0698-AR-12 was issued on December 16, 2011. This permitting action allowed for the following:

1. The replacement of the two 12" troesters (SN-13) on the Comerio Calender Line with two 13" troesters;
2. An increase of the process rate of the Comerio Calender Line on-line calendar (SN-14) from 24,000 lb/hr to 26,000 lb/hr;
3. The installation of an automated process for the Quick Prime Plus pre-tape operation;
4. The removal of HAPs currently listed at SN-13 and SN-14;
5. The removal of the thermal oxidizer as a control device for the Primer/Laminating Machine (SN-315); and
6. Updates to the process description.

The total permitted emission increases included 2.92 tpy of Toluene. The total permitted emission decreases included 1.2 tpy of PM/PM_{10} and 2.0 tpy of VOC.

Permit 0698-AR-13 was issued on June 6, 2012. This permitting action allowed for the following:

1. Modified SN-202, the dust collector for the White Line Pigment Blender No. 11, installed a new fan (32,000 cfm) and re-routed SN-203 (White Line Banbury Mixer No. 11 inlet) and SN-204 (White Line Banbury Mixer No. 11 outlet) to this dust collector and removed the dust collectors at SN-203 and SN-204;
2. Installed a new autoclave (SN-08G);
3. Installed a shredder at the Comerio Calender line to process quality rejects from the calender to be blended back in with the extruder;
4. Installed a Mandrel Grinding Dust Collector system (SN-502);
5. Corrected information about the new Troesters (SN-13) on the Comerio Calender line that was approved with the De Minimis change approved on September 28, 2011. The new Troesters have a maximum capacity of 17,000 lb/hr per Troester, with a total maximum capacity of 34,000 lb/hr;
6. Increased the amount of rubber that can be mixed at the K1 and K2 Banbury Mixers from 432 MM lb/yr of rubber to 613 MM lb/yr of rubber;
7. Increased production through the Calender lines and the Autoclaves;
8. Removed source SN-15, which was the slab dip mix tank. Firestone no longer mixes slab dip at the facility;
9. Changed SN-160 from a fuel oil storage tank to a pigment oil storage tank;
10. Renamed SN-316 from "Quick Prime Plus" to "Pre-Tape Line";
11. Removed fuel oil as a fuel source for the boilers (SN-16A and SN-16B) and maximized emissions based on burning natural gas at each boiler for 8,760 hr/yr;
12. Revised the emission limits for various sources;

13. Removed the Breakdown Mill (SN-11), Strainer Mills No. 1 and No. 2 (SN-10 and SN-12), and the Heater (SN-403) from the permit; and
14. Removed various conditions that no longer apply to the facility with regards to compliance mechanisms, testing, etc.

The total permitted emission increases included 40.1 tpy of CO, 4.9 tpy of NO_x, 0.03 tpy of Allyl Chloride, 0.77 tpy of Hexane, 1.33 tpy of Methanol, 4.40 tpy of Methylene Chloride, 0.02 tpy of Beryllium, and 0.02 tpy of Chromium. The total permitted emission decreases included 1.0 tpy of PM/PM_{10}, 42.9 tpy of VOC, 0.05 tpy of 1,3-Butadiene, 3.27 tpy of Benzene, 0.29 tpy of Cumene, 0.24 tpy of POC, 0.30 tpy of Epichlorohydrin, 0.46 tpy of Ethylbenzene, 2.30 tpy of m- and p-Xylene, 0.63 tpy of o-Xylene, 0.53 toy of Dichloromethane, 0.04 tpy of Nickel Compounds, 0.04 tpy of Phenol, and 2.50 tpy of Toluene.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. [Regulation 19, §19.501 et seq., and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
STORAGE and TRANSFER				
SN-01A	Carbon Black Storage Tank No. 1	PM_{10}	2.0	3.3
SN-01B	Carbon Black Storage Tank No. 2	PM_{10}	2.0	
SN-101A	Carbon Black Storage Tank No. 3	PM_{10}	1.5	3.3
SN-101B	Carbon Black Storage Tank No. 4	PM_{10}	1.5	
SN-201	Carbon Black Storage Tank No. 5	PM_{10}	1.5	
SN-17A	Carbon Black Transfer	PM_{10}	0.8	3.3
SN-17B	Carbon Black Transfer	PM_{10}	0.8	
SN-301A	Carbon Black Rail Unloading #1	PM_{10}	0.3	0.4
SN-304	Carbon Black Rail Unloading #2	PM_{10}	0.2	
SN-18A	Carbon Black Surge Hopper K1 Banbury	PM_{10}	0.8	0.8
SN-18B	Carbon Black Surge Hopper K1 Banbury	PM_{10}	0.8	
SN-118	Carbon Black Surge Hopper K2	PM_{10}	0.8	0.8
SN-305	Carbon Black Surge Bin	PM_{10}	0.8	
SN-307	Kaolin Clay Silo A	PM_{10}	1.5	4.4
SN-308	Kaolin Clay Silo B	PM_{10}	1.5	
SN-309A	Kaolin Clay Surge Bin	PM_{10}	1.5	4.4
SN-309B	Kaolin Clay Surge Bin	PM_{10}	1.5	
SN-310	Kaolin Clay Railcar Circulation	PM_{10}	0.8	4.4

SN	Description	Pollutant	lb/hr	tpy
SN-311	Kaolin Clay Railcar Unloading	PM_{10}	0.8	
SN-130	Mineral Oil Storage Tank	These sources have been moved to the Insignificant Activities Section of the permit.		
SN-131	Pigment Oil 20M Storage Tank			
SN-132	Pigment Oil 50M Storage Tank #1			
SN-133	Pigment Oil 50M Storage Tank #2			
SN-160	Pigment Oil Storage Tank			
BLACK LINE				
SN-02A	Pigment Blender K #1	PM_{10}	0.2	1.8
SN-02B	Pigment Blender K #2	PM_{10}	0.2	
SN-102	Pigment Blender K2	PM_{10}	0.3	
SN-120	Pigment Weigh Area	PM_{10}	0.2	1.0
SN-103	Banbury Mixer K2 Baghouse (Inlet)	PM_{10} VOC	0.3 0.7	1.1 2.8
SN-104	Banbury Mixer K2 Baghouse (Discharge)	PM_{10} VOC	0.3 0.7	1.1 2.8
SN-109	Slab Mill and Soap Dip Tank K2	This source has been moved to the Insignificant Activities Section of the permit.		
SN-15	Slab Dip Mix Tank	Removed from service with Permit # 0689-AR-13.		
SN-03	Banbury Mixer K1 Baghouse (Inlet, discharge & mill drop)	PM_{10} VOC	0.3 0.7	1.1 2.8
SN-04	Removed (Emissions routed through SN-03)			
SN-20	Removed (Emissions routed through SN-03)			
SN-09	Slab Mill and Soap Dip Tank	This source has been moved to the Insignificant Activities Section of the permit.		
SN-11	Breakdown Mill	Removed from service with Permit # 0689-AR-13.		
SN-10	Strainer Mill #1			
SN-12	Strainer Mill #2			
SN-13	Troesters (Comerio Line)	PM_{10} VOC	0.1 0.7	0.1 2.7
SN-14	On Line Calendar (Two Stacks)	VOC	0.7	2.7

SN	Description	Pollutant	lb/hr	tpy
SN-19	Solvent Storage	Not Currently In Use		
SN-119	Solvent Storage	Not Currently In Use		
SN-306	Duster (Emission Point 1)	PM_{10}	0.3	1.5
SN-07	Duster (Emission Point 2)	PM_{10}	0.3	1.3
WHITE LINE				
SN-202	Pigment Blenders #11	PM_{10} VOC	0.3 0.3	1.1 0.7
SN-203	Banbury Mixer #11 (Inlet)	Emissions routed through SN-202		
SN-204	Banbury Mixer #11 (Discharge)			
SN-205	Drop Mill and Slab Mill #11	PM_{10}	0.1	0.4
SN-115	Slab Dip Tank	This source has been moved to the Insignificant Activities Section of the permit.		
SN-317	White Seam Tape	PM_{10} VOC	0.4 0.1	1.6 0.2
Z-CALENDAR LINE				
SN-08A	Autoclave #1	VOC	0.2	0.6
SN-08B	Autoclave #2	VOC	0.2	
SN-08C	Autoclave #3	VOC	0.2	
SN-08D	Autoclave #4	VOC	0.2	
SN-08E	Autoclave #5	VOC	0.2	
SN-08F	Autoclave #6	VOC	0.2	
SN-08G	Autoclave #7	VOC	0.3	
SN-323A	Troester #1	PM_{10} VOC	0.1 0.3	0.1 1.1
SN-323B	Troester #2	PM_{10} VOC	0.1 0.3	0.1 1.1
SN-114	Calendar	VOC	0.5	2.1
SN-116	Calendar Vacuum	PM_{10}	0.2	0.5
SN-107	Duster #2	PM_{10}	0.3	1.3
SN-302	Wind Up Unit #2	PM_{10}	0.6	2.0

SN	Description	Pollutant	lb/hr	tpy
SN-303	Wrapping Unit #2	PM_{10}	0.3	1.0
FLASHING LINE				
SN-206	Breakdown Mill	PM_{10} VOC	0.1 0.2	0.1 0.8
SN-207	Feed Mill	PM_{10} VOC	0.1 0.2	0.1 0.8
SN-330	Calendar	VOC	0.2	0.8
TAPE LINE				
SN-312	Mixer #2 - #3 Extruders	PM_{10} VOC	0.1 0.1	0.2 0.3
SN-313	Tape System Warm Up Mill	VOC	0.1	0.1
SN-314A	Process Oil Storage	These sources have been moved to the Insignificant Activities Section of the permit.		
SN-314B	Process Oil Storage			
MISCELLANEOUS SOURCES				
SN-16A	Boiler #1 (Natural Gas)	PM_{10} SO_2 VOC CO NO_x	0.6 0.1 0.5 6.3 7.5	2.5 0.2 1.9 27.6 32.9
SN-16B	Boiler #2 (Natural Gas)	PM_{10} SO_2 VOC CO NO_x	0.6 0.1 0.5 6.3 7.5	2.5 0.2 1.9 27.6 32.9
SN-315	Primer/Laminating Machines (2 machines)	VOC	0.1	0.1
SN-316	Pre-Tape Operations (Automated and Manual)	VOC	2.0	4.4
SN-403	Heater (Natural Gas-fired)	Removed from service with Permit # 0689-AR-13.		
SN-500	Maintenance/Cleaning	VOC	1.0	0.6
SN-501	Ink Marking Line	VOC	0.3	1.3
SN-502	Mandrel Grinding Dust Collector	PM_{10}	0.1	0.1

2. The permittee shall not exceed the emission rates set forth in the following table. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
STORAGE and TRANSFER				
SN-01A	Carbon Black Storage Tank No. 1	PM	2.0	3.3
SN-01B	Carbon Black Storage Tank No. 2	PM	2.0	
SN-101A	Carbon Black Storage Tank No. 3	PM	1.5	3.3
SN-101B	Carbon Black Storage Tank No. 4	PM	1.5	
SN-201	Carbon Black Storage Tank No. 5	PM	1.5	
SN-17A	Carbon Black Transfer	PM	0.8	3.3
SN-17B	Carbon Black Transfer	PM	0.8	
SN-301A	Carbon Black Rail Unloading #1	PM	0.3	0.4
SN-304	Carbon Black Rail Unloading #2	PM	0.2	
SN-18A	Carbon Black Surge Hopper K	PM	0.8	0.8
SN-18B	Carbon Black Surge Hopper K	PM	0.8	
SN-118	Carbon Black Surge Hopper K2	PM	0.8	0.8
SN-305	Carbon Black Surge Bin	PM	0.8	
SN-307	Kaolin Clay Silo A	PM	1.5	4.4
SN-308	Kaolin Clay Silo B	PM	1.5	
SN-309A	Kaolin Clay Surge Bin	PM	1.5	4.4
SN-309B	Kaolin Clay Surge Bin	PM	1.5	
SN-310	Kaolin Clay Railcar Circulation	PM	0.8	4.4
SN-311	Kaolin Clay Railcar Unloading	PM	0.8	
BLACK LINE				

SN	Description	Pollutant	lb/hr	tpy
SN-02A	Pigment Blender K #1	PM	0.2	1.8
SN-02B	Pigment Blender K #2	PM	0.2	
SN-102	Pigment Blender K2	PM	0.3	
SN-120	Pigment Weigh Area	PM	0.2	1.0
SN-103	Banbury Mixer K2 Baghouse (Inlet)	PM Hexane Methanol Methylene Chloride Toluene	0.3 0.29 0.04 0.13 0.02	1.1 1.24 0.17 0.57 0.06
SN-104	Banbury Mixer K2 Baghouse (Discharge)	PM Hexane Methanol Methylene Chloride Toluene	0.3 0.29 0.04 0.13 0.02	1.1 1.24 0.17 0.57 0.06
SN-109	Slab Mill and Soap Dip Tank K2	This source has been moved to the Insignificant Activities Section of the permit.		
SN-15	Slab Dip Mix Tank	Removed from service with Permit # 0689-AR-13.		
SN-03	Banbury Mixer K1 Baghouse (Inlet, Discharge & Drop Mill)	PM Hexane Methanol Methylene Chloride Toluene	0.3 0.29 0.04 0.13 0.02	1.1 1.24 0.17 0.57 0.06
SN-04	Removed (Emissions routed through SN-03)			
SN-20	Removed (Emissions routed through SN-03)			
SN-09	Slab Mill and Soap Dip Tank	This source has been moved to the Insignificant Activities Section of the permit.		
SN-11	Breakdown Mill	Removed from service with Permit # 0689-AR-13.		
SN-10	Strainer Mill #1			
SN-12	Strainer Mill #2			
SN-13	Troesters	PM Hexane Methanol Methylene Chloride Toluene	0.1 0.28 0.04 0.13 0.02	0.1 1.21 0.17 0.55 0.06

SN	Description	Pollutant	lb/hr	tpy
SN-14	On Line Calendar	Hexane Methanol Methylene Chloride Toluene	0.28 0.04 0.13 0.02	1.21 0.17 0.55 0.06
SN-19	Solvent Storage	Not Currently In Use		
SN-119	Solvent Storage	Not Currently In Use		
SN-306	Duster (Emission Point 1)	PM	0.3	1.5
SN-07	Duster (Emission Point 2)	PM	0.3	1.3
WHITE LINE				
SN-202	Pigment Blenders #11	PM Hexane Methanol Methylene Chloride Toluene	0.3 0.11 0.02 0.05 0.01	1.1 0.29 0.04 0.13 0.02
SN-203	Banbury Mixer #11 (Inlet)	Emissions routed through SN-202		
SN-204	Banbury Mixer #11 (Discharge)			
SN-205	Drop Mill and Slab Mill #11	PM	0.1	0.4
SN-115	Slab Dip Mix Tank #11	This source has been moved to the Insignificant Activities Section of the permit.		
SN-317	White Seam Tape	PM Hexane Methylene Chloride Toluene	0.4 0.02 0.01 0.01	1.6 0.08 0.01 0.04
Z-CALENDAR LINE				
SN-323A	Troester #1	PM Hexane Methanol Methylene Chloride Toluene	0.1 0.11 0.02 0.05 0.01	0.1 0.46 0.07 0.21 0.02
SN-323B	Troester #2	PM Hexane Methanol Methylene Chloride Toluene	0.1 0.11 0.02 0.05 0.01	0.1 0.46 0.07 0.21 0.02
SN-114	Calendar	Hexane Methanol Methylene Chloride Toluene	0.21 0.03 0.10 0.01	0.92 0.13 0.42 0.05

SN	Description	Pollutant	lb/hr	tpy
SN-116	Calendar Vacuum	PM	0.2	0.5
SN-107	Duster #2	PM	0.3	1.3
SN-302	Wind Up Unit #2	PM	0.6	2.0
SN-303	Wrapping Unit #2	PM	0.3	1.0
SN-08A	Autoclave #1	Allyl Chloride Methylene Chloride Toluene	0.01 0.01 0.01	0.02[a] 0.04[a] 0.03[a]
SN-08B	Autoclave #2	Allyl Chloride Methylene Chloride Toluene	0.01 0.01 0.01	[a] [a] [a]
SN-08C	Autoclave #3	Allyl Chloride Methylene Chloride Toluene	0.01 0.01 0.01	[a] [a] [a]
SN-08D	Autoclave #4	Allyl Chloride Methylene Chloride Toluene	0.01 0.01 0.01	[a] [a] [a]
SN-08E	Autoclave #5	Allyl Chloride Methylene Chloride Toluene	0.01 0.01 0.01	[a] [a] [a]
SN-08F	Autoclave #6	Allyl Chloride Methylene Chloride Toluene	0.01 0.01 0.01	[a] [a] [a]
SN-08G	Autoclave #7	Allyl Chloride Methylene Chloride Toluene	0.01 0.01 0.01	[a] [a] [a]
FLASHING LINE				
SN-206	Breakdown Mill	PM Hexane Methanol Methylene Chloride Toluene	0.1 0.09 0.02 0.04 0.01	0.1 0.36 0.05 0.17 0.02
SN-207	Feed Mill	PM Hexane Methanol Methylene Chloride Toluene	0.1 0.09 0.02 0.04 0.01	0.1 0.36 0.05 0.17 0.02
SN-330	Calendar	Hexane Methanol Methylene Chloride Toluene	0.09 0.02 0.04 0.01	0.36 0.05 0.17 0.02

SN	Description	Pollutant	lb/hr	tpy
TAPE LINE				
SN-312	Mixer #2 - #3 Extruders	PM Hexane Methanol Methylene Chloride Toluene	0.1 0.03 0.01 0.02 0.01	0.2 0.13 0.02 0.06 0.01
SN-313	Tape System Warm Up Mill	Allyl Chloride Methylene Chloride Toluene	0.01 0.01 0.01	0.01 0.01 0.01
MISCELLANEOUS SOURCES				
SN-16A	Boiler #1 (Natural Gas)	PM Beryllium Chromium Hexane Toluene	0.6 1.0E-06 2.0E-04 0.01 0.01	2.5 0.01 0.01 0.03 0.01
SN-16B	Boiler #2 (Natural Gas)	PM Beryllium Chromium Hexane Toluene	0.6 1.0E-06 2.0E-04 0.01 0.01	2.5 0.01 0.01 0.03 0.01
SN-316	Pre-Tape Operations (Automated and Manual)	Toluene	1.97	4.33
SN-403	Heater (Natural Gas-fired)	Removed from service with Permit # 0689-AR-13.		
SN-502	Mandrel Grinding Dust Collector	PM	0.1	0.1

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
01A, 01B, 02A, 02B, 03, 07, 15, 16A, 16B, 17A, 17B, 18A, 18B, 101A, 101B, 102 -104, 107, 116, 118, 120, 201, 202, 205, 301A, 302 – 308, 309A, 309B, 310 – 312, 317, 502	5%	§18.501
13, 206, 207, 323A, 323B	20%	§19.503

4. The permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise

prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

5. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Regulation 18, §18.901 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

6. The permittee shall not use in excess of 11.0 gallons per month or 130 gallons per consecutive 12-month period of solvent for cold cleaning parts. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

7. The permittee shall not use any solvent at the facility for cold cleaning parts which contains VOC in excess of 8.9 pounds per gallon. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

8. The permittee shall maintain monthly records which demonstrate compliance with Specific Conditions 6 and 7. These records shall indicate each month's usage of solvent, and shall indicate the VOC content (in lb/gal) for each solvent used during each month. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

9. The permittee shall not use in excess of 370 gallons per consecutive 12-month period of total inks and cleaners. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

10. The permittee shall not use any inks or cleaners at the facility which contain VOC in excess of 7.0 pounds per gallon. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

11. The permittee shall maintain monthly records which demonstrate compliance with Specific Conditions 9 and 10. These records shall indicate each month's usage of total inks and cleaners, and shall indicate the VOC content (in lb/gal) for each ink or cleaner used during each month. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

12. The permittee shall not use any primer in either of the two primer machines (SN-315) which has a density in excess of 6.60 pounds per gallon. The primer shall not contain HAPs. [Regulation 18, §18.1004; Regulation 19, §19.705; and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

13. The permittee shall maintain records which demonstrate compliance with Specific Condition 0. These records shall indicate the density (in lb/gal) for each primer used at SN-315. Records shall be updated as necessary whenever a new primer is used at SN-315. These records shall be kept on site, and shall be made available to Department personnel upon request. [Regulation 19, §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

14. The permittee shall not use more than 60.0 gallons of primer at the primer machines (SN-315) during any consecutive 24-hour period. [Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and/or §18.1004 of Regulation 18]

15. The permittee shall maintain daily records which demonstrate compliance with Specific Condition 14. These records shall be maintained on-site in a spreadsheet, database, or other well organized format. The records shall be updated daily, and shall be made available to Department personnel upon request. [Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and/or §18.1004 of Regulation 18]

16. The permittee shall not use more than 21,900 gallons of primer, total, at the two primer and laminating machines (SN-315) during any consecutive 12-month period. [Regulation 18, §18.1004, Regulation 19, §19.705, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

17. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition 16. These records shall indicate each month's primer usage at the primer/laminating machines. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. The 12-month rolling totals and each individual month's data shall be maintained on-site and made available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

18. Total combined annual rubber production through Banbury Mixers K1 and K2 shall not exceed 613 million pounds per consecutive 12-month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

19. The permittee shall maintain records which demonstrate compliance with Specific Condition 18. These records shall indicate the amount of rubber produced at each Banbury Mixer (SN-03 and SN-103) during each month. These records shall be updated by the 15th day of the month following the month to which the records pertain. A 12-month rolling total and each individual month's data shall be maintained on-site and shall be made available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

20. The permittee shall not exceed the maximum raw material usage specified in the confidential permit application dated December 2, 2011 during any consecutive 12-month period. [Regulation 18, §18.1004 ; Regulation 19, §19.705; and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

21. The permittee shall maintain a copy of the confidential permit application dated December 2, 2011 on site and maintain monthly records which demonstrate compliance with Specific Condition 20. These records shall indicate each month's usage of carbon black, pigments, clay, EPDM, pigment oils, and mineral oils used during each month, and the 12-month rolling total. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be submitted annually in accordance with General Condition 6. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

22. Total rubber production through Banbury Mixer 11 (SN-203) shall not exceed 70 million pounds per year. These records shall indicate each month's rubber production at SN-203. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. The 12-month rolling totals and each individual month's data shall be maintained on-site and made available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

23. The permittee shall use only natural gas to fuel Boiler #1 (SN-16A) and Boiler #2 (SN-16B). [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

24. The permittee is authorized to test start the emergency diesel fire pump and the emergency diesel generator once per week for the purpose of verifying the proper working condition of the equipment. The test start is intended only as a safety check. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

25. All emergency engines at the facility are subject to 40 CFR Part 63, Subpart ZZZZ with a compliance date of October 19, 2013. The permittee shall submit an application at least 6 months before the compliance date to incorporate all applicable requirements of the subpart. [A.C.A.§8-4-203 as referenced by §8-4-304, §8-4-311 and 40 CFR 70.6]

26. The permittee shall not use more than 4,630 gallons of primer at the Pre-Tape Operations (Automated and Manual) (SN-316) during any consecutive 12-month period. [Regulation 18, §18.1004 ; Regulation 19, §19.705; and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

27. The permittee shall maintain a 12-month rolling total which demonstrates compliance with Specific Condition 26. These records shall indicate each month's usage of primer used during each month, the amount of VOC emissions for the month, and the 12-month rolling total. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

28. The permittee shall not use any primer in Pre-Tape Operations (Automated and Manual) (SN-316) which contains in excess of 1.87 pounds per gallon of VOC. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4311]

29. The permittee shall not use any primer in the Pre-Tape Operations (SN-316) which contains in excess of 1.87 pounds per gallon of Toluene. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

30. The permittee shall maintain records which demonstrate compliance with Specific Conditions 0 and 29. These records shall indicate the VOC content (lb/gal) and the Toluene content (lb/gal). These records shall be kept on site, and shall be made available to Department personnel upon request. [Regulation 18, §18.1004; Regulation 19, §19.705; and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

31. The permittee shall test Boiler #1 (SN-16A) and Boiler #2 (SN-16B), within 180 days of issuance of Permit # 0689-AR-13, and annually thereafter until the facility conducts two successive annual tests. If both of these annual tests are successful, then the facility may perform stack testing once every 5 years. If at any time the facility fails one of the 5-year tests, then the facility must conduct two successive annual tests. The exhaust stack shall be tested for particulate matter, nitrogen oxides, carbon monoxide, and opacity. All emissions shall be measured with an approved test method. EPA Reference method 5 or 201A shall be used to determine PM_{10} concentration. EPA Reference Method 7E and 10 shall be used to determine NO_X and CO concentrations respectively. EPA Reference Method 9 shall be used to determine opacity. The permittee shall test the boilers within 90% of the permitted capacity. If testing is conducted at a rate lower than 90%, the boilers shall be limited to an operating rate of 110% of the tested rate until compliance at a higher rate is demonstrated. The permittee shall conduct the required tests in accordance with General Condition 7. [Regulation 19, §19.702 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

32. The permittee shall test either Boiler #1 (SN-16A) or Boiler #2 (SN-16B), within 180 days of issuance of Permit # 0689-AR-13. The exhaust stack shall be tested for Hexane. EPA Reference Method 18 shall be used to determine Hexane concentrations. The permittee shall test the boilers within 90% of the permitted capacity. If testing is conducted at a rate lower than 90%, the boilers shall be limited to an operating rate of 110% of the tested rate until compliance at a higher rate is demonstrated. The permittee shall conduct the required tests in accordance with General Condition 7. [Regulation 18, §18.1001 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

33. The permittee shall test SN-03 once every 5 years. The last testing was conducted in October 2011. The exhaust stack shall be tested for total VOC and HAPs. EPA Reference Methods 25A, SW-846 Method 0031 (modified), and/or EPA TO-15 (modified) shall be used to determine the total VOC and HAP concentrations. The permittee shall test while operating within 90% of maximum capacity. If testing is conducted at a rate lower than 90%, the facility shall be limited to an operating rate of

110% of the tested rate until compliance at a higher rate is demonstrated. The permittee shall conduct the required tests in accordance with General Condition 7. [Regulation 18, §18.1001; Regulation 19, §19.702; and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

34. The permittee shall test SN-08A through SN-08G once every 5 years. The last testing was conducted in October 2011. The exhaust stack shall be tested for total VOC and HAPs. EPA Reference Methods 25A and EPA TO-15 (modified) shall be used to determine the total VOC and HAP concentrations. The permittee shall test while operating within 90% of maximum capacity. If testing is conducted at a rate lower than 90%, the autoclaves shall be limited to an operating rate of 110% of the tested rate until compliance at a higher rate is demonstrated. The permittee shall conduct the required tests in accordance with General Condition 7. [Regulation 18, §18.1001; Regulation 19, §19.702; and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

35. The permittee shall update all MSDS for all raw materials used in rubber products production at the facility on an annual basis. These records shall be maintained on site, and shall be made available to Department personnel upon request. [Regulation 18, §18.1004; Regulation 19, §19.705; and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

36. The permittee shall not produce more than 17,520,000 pounds of white tape compound at the White Seam Tape (SN-317) during any consecutive 12-month period. [Regulation 18, §18.1004; Regulation 19, §19.705; and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

37. The permittee shall maintain a 12-month rolling total which demonstrates compliance with Specific Condition 36. These records shall indicate each month's usage of white tape compound used during each month and the 12-month rolling total. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Section V: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated September 29, 2005, March 15, 2010, April 25, 2011, and July 2, 2012.

Description	Category
Seam Tape Testing Lab Vent	A-5
Cooling Towers for Curing	A-13
Cooling Tower for Chillers	A-13
Cooling Tower for Process	A-13
Cooling Tower for Effluent	A-13
Cooling Tower for Mixtruder	A-13
Day Tanks for SN-317 (1 x 80 gallon tank and 1 x 139.9 gallon tank)	A-13
Devulcanization Process	A-13
Comerio Line Shredder	A-13
Slab Dip/Soap Tanks (previously permitted as SN-09, SN-109, and SN-115)	A-13
20,000 gallon Mineral Oil Storage Tank (previously permitted as SN-130)	B-21
Pigment Oil Storage Tanks (previously permitted as SN-131, SN-132, SN-133, & SN-160) 2 tanks have a capacity of 20,000 gallons and 2 tanks have a capacity of 50,000 gallons	B-21
2x 10,000 gallon Process Oil Storage Tanks (previously permitted as SN-314A and SN-314B)	B-21

Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.

2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

3. The permittee shall notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Regulation 19 §19.704 and/or A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Regulation 19 §19.410(B) and/or Regulation 18 §18.309(B) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [Regulation 19 §19.705 and/or Regulation 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [Regulation 19 §19.705 and/or Regulation 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

   Arkansas Department of Environmental Quality
   Air Division
   ATTN: Compliance Inspector Supervisor

5301 Northshore Drive
North Little Rock, AR 72118-5317

7. The permittee shall test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) business days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) calendar days after the completion of testing. [Regulation 19 §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

8. The permittee shall provide: [Regulation 19 §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

   a. Sampling ports adequate for applicable test methods;
   b. Safe sampling platforms;
   c. Safe access to sampling platforms; and
   d. Utilities for sampling and testing equipment

9. The permittee shall operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee shall maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Regulation 19 §19.303 and/or Regulation 18 §18.1104 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Regulation 19 §19.601 and/or Regulation 18 §18.1101 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

    a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
    b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
    c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and

nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.

11. The permittee shall allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

    a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
    b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
    c. To inspect any monitoring equipment or monitoring method required in this permit;
    d. To sample any emission of pollutants; and
    e. To perform an operation and maintenance inspection of the permitted source.

12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [Regulation 19 §19.410(A) and/or Regulation 18 §18.309(A) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Regulation 19 §19.407(B) and/or Regulation 18 §18.307(B) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]

19. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:

    a. Such an extension does not violate a federal requirement;
    b. The permittee demonstrates the need for the extension; and
    c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

    [Regulation 18 §18.314(A), Regulation 19 §19.416(A), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

20. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facilities total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:

    a. Such a request does not violate a federal requirement;
    b. Such a request is temporary in nature;
    c. Such a request will not result in a condition of air pollution;
    d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
    e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
    f. The permittee maintains records of the dates and results of such temporary emissions/testing.

    [Regulation 18 §18.314(B), Regulation 19 §19.416(B), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

21. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:
    a. The request does not violate a federal requirement;
    b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
    c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

    [Regulation 18 §18.314(C), Regulation 19 §19.416(C), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

CERTIFICATE OF SERVICE

I, Pam Owen, hereby certify that a copy of this permit has been mailed by first class mail to Firestone Building Products Company, LLC, P.O. Box 710, Prescott, AR, 71857, on this 10th day of September 2012.

Pam Owen

Pam Owen, AAII, Air Division