

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0957-AOP-R13 AFIN: 46-00005

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

Cooper Tire & Rubber Company
3500 East Washington Road
Texarkana, Arkansas 71854

3. PERMIT WRITER:

Charles Hurt, P.E.

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Tire Manufacturing (except Retreading)
NAICS Code: 326211

5. SUBMITTALS:

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
9/14/2015	Minor Modification	Replace one green tire spray booth
9/17/2015	Renewal with Modification	Include previously unpermitted fire pump engines (SN-140 and SN-141) and cooling towers (insignificant activities)
11/20/15	Minor Modification	Replace five Tire Uniformity Machines and modify Mixers #1 and #7

6. REVIEWER'S NOTES:

Cooper Tire & Rubber Company (AFIN: 46-00005) operates a tire manufacturing facility located at 3500 East Washington Road, Texarkana, AR 71854. Cooper submitted applications to renew the Title V permit with modifications. The permit modifications included equipment replacement and modifications, permitting existing fire pump engines (SN-140 and SN-141) and applicable RICE MACT requirements, and

adding existing cooling towers to the Insignificant Activities List. Overall, permitted emission limits increased by 0.5 tpy PM/PM₁₀, 0.5 tpy SO₂, 1.4 tpy CO, 5.8 tpy NO_x, and 0.02 tpy HAP.

Cooper proposed to replace five Tire Uniformity Machines within the source grouping GR-05 and one Green Tire Spray booth within the source grouping GR-04. No increases were proposed to the currently permitted throughputs for either GR-04 or GR-05.

In addition the replacements above, Cooper proposed to modify the two of the rubber mixing systems in the source grouping GR-01. The modifications involved replacing the mill with a sheeter for Mixer #1 (SN-01) and modifying Mixer #7 (SN-06) by replacing the mixing body with one of larger capacity. As a result of the increased capacity to Mixer #7 the previous permit limit for the silica ingredient was increase from 4,000 tpy to 7,000 tpy.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

The facility was last inspected on February 3, 2015 and determined to be operating out of compliance. The following inspection concerns were noted:

After a review of the Annual Compliance Certification and Semiannual Monitoring Report submitted on January 30, 2015, the following areas of concern were noted: SC#3: Shall not exceed 20% opacity for GR-01 and compliance kept with Plantwide 8. 1 weekly visible emission not performed on 3/16/14 to 3/22/14. SC#10: Shall not exceed 20% opacity for GR-03 and compliance kept with Plantwide 8. 1 weekly visible emission not performed on 1/5/14 to 1/11/14. SC#17: Shall not exceed 20% opacity for GR-04 and compliance kept with Plantwide 8. 1 weekly visible emission not performed on 1/5/14 to 1/11/14. SC#24: Shall not exceed 20% opacity for GR-05 and compliance kept with Plantwide 8. 1 weekly visible emission not performed on 1/5/14 to 1/11/14. SC#27: Shall not exceed 20% opacity for GR-06 and compliance kept with Plantwide 8. 1 weekly visible emission not performed on 1/5/14 to 1/11/14. SC#36: Shall not exceed 20% opacity for SN-07 and compliance kept with Plantwide 8. 1 weekly visible emission not performed on 3/16/14 to 3/22/14. SC#59: Shall not exceed 20% opacity for SN-59 and compliance kept with Plantwide 8. 1 weekly visible emission not performed on 3/16/14 to 3/22/14. SC#60: Shall not emit more than 3.8 lbs/hr of VOC from SN-67. Compliance shown through SC 61 and Plantwide 9. VOC emission limits were exceeded due to limits in SC 61 and Plantwide 9 being exceeded. SC#61: Shall not process in excess of 650 gallons of cement and 2000 gallons of solvent from SN-67 in a consecutive 12 month period. Gallons of cement used were exceeded in September 2014 and October 2014. Plantwide 8: Weekly visible emissions observations kept for GR-01, GR-02, GR-03, GR-04, GR-05, GR-06, SN 07, and SN-59. 1 weekly visible emission observation was not recorded for GR-01,

GR-03, GR-04, GR-05, GR-06, SN 07, and SN-59. Plantwide 9: Shall not process in excess of 650 gallons of cement at SN-67 during consecutive 12 month period. The gallons of cement used in September were 671 gallons. The gallons of cement used in October were 675 gallons. These both violate the permit limit of 650 gallons.

A CAO to address these concerns is being processed.

8. PSD APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N

b) Is the facility categorized as a major source for PSD? N
 · Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list

If yes, explain why this permit modification is not PSD.

N/A

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
GR-03 & GR-04	All Listed	NSPS Subpart BBB
SN-89	Opacity and SO ₂	NSPS Subpart Dc
SN-140 and SN-141	HAP	NESHAP ZZZZ

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. AMBIENT AIR EVALUATIONS:

a) Reserved.

b) Non-Criteria Pollutants:

The only new or modified source of HAP emissions with this permitting action are emergency fire pumps. Since the sources are operated infrequently an updated evaluation for HAPs is not necessary. The previous permit evaluation (below) is provided solely for reference and was not used in this current permitting action.

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department

has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m^3), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = $0.11 \times \text{TLV}$	Proposed lb/hr	Pass?
1,1,2,2-Tetrachloroethane	6.87	0.76	0.02	PASS
1,1-Dichloroethene	19.8	2.18	0.04	PASS
1,2-Dibromo-3-Chloropropane	9.66	1.06	0.03	PASS
1,3-Butadiene	4.42	0.49	0.05	PASS
2,2,4-Trimethyl pentane	1401.5	154.2	0.16	PASS
Acetophenone	49.1	5.41	0.27	PASS
Acrylonitrile	4.34	0.48	0.01	PASS
Aniline	7.54	0.83	0.72	PASS
Benzene	1.60	0.18	0.12	PASS
Benzyl Chloride	5.18	0.57	0.01	PASS
Bis(2-Ethylhexyl)phthalate	5.00	0.55	0.19	PASS
Carbonyl Sulfide	245.7	27.0	0.21	PASS
Ethyl Acrylate	20.5	2.25	0.01	PASS
Ethyl Benzene	434.2	47.8	1.37	PASS
Glycol Ethers	100.0	11.0	0.68	PASS
Hexane	176.2	19.4	1.09	PASS
Methanol	262.1	28.8	0.01	PASS
Methyl Isobutyl Ketone	81.9	9.01	4.05	PASS
Methylene Chloride	173.7	19.1	1.49	PASS
Phenol	19.2	2.12	0.11	PASS
Selenium	0.200	0.02	0.01	PASS
Styrene	85.2	9.37	0.76	PASS
Tetrachloroethene	169.5	18.6	0.42	PASS
Toluene	75.4	8.29	2.46	PASS
Xylene	434.2	47.8	0.25	PASS
Acrolein	0.229	0.03	0.06	Model
Arsenic	0.010	0.0011	0.01	Model
Beryllium	0.00005	5.50E-06	5.13E-04	Model
Cadmium	0.002	2.20E-04	0.04	Model
Carbon Disulfide	3.11	0.34	1.96	Model
Formaldehyde	0.368	0.04	0.07	Model
Hexachlorobutadiene	0.021	0.0023	0.03	Model
Lead	0.050	0.0055	8.35E-03	Model
Mercury	0.010	0.0011	0.01	Model

2nd Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the

property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL ($\mu\text{g}/\text{m}^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu\text{g}/\text{m}^3$)	Pass?
Acrolein	2.29	0.52	PASS
Arsenic	0.10	0.01	PASS
Beryllium	5.00E-04	4.60E-04	PASS
Cadmium	0.02	2.65E-03	PASS
Carbon Disulfide	31.14	13.98	PASS
Formaldehyde	3.68	0.08	PASS
Hexachlorobutadiene	0.21	0.1996	PASS
Lead	0.50	0.08	PASS
Mercury	0.10	0.01	PASS

c) H₂S Modeling:

Examination of the source type, location, plot plan, land use, emission parameters, and other available information indicate that modeling is not warranted at this time for hydrogen sulfide.

12. CALCULATIONS:

SN	Emission Factor Source	Emission Factor and units	Control Equipment Type	Control Equipment Efficiency	Comments
GR-01	RMA	4.00E-04 lb PM/lb rubber 3.86E-05 lb VOC/lb rubber 7.88E-03 lb VOC/ lb silica	Baghouse	95%	RMA is the Rubber Manufacturers Association.
GR-02	RMA	4.00E-04 lb PM /lb rubber	Baghouse	95%	
GR-03	MSDS NSPS	PM: 8% solids 10% overspray VOC: 7.5 gr/tread	None	None	
GR-04	Stack Test	PM: 0.0015 lb/tire VOC: 2 gr/tire	None	None	
GR-05	RMA	PM: 0.05 lb/tire VOC: 1.59E-2 lb/lb rubber	Baghouse	95.8%	
GR-06	RMA	PM: 0.10 lb/tire VOC: 1.59E-2 lb/lb rubber	Baghouse	99.2%	
GR-08	MSDS	VOC: 6.52 lb/gal ink 9.11 lb/gal thinner	None	None	
SN-07	AP-42 11.24-2	PM: 0.12 lb/ton	Baghouse	95%	
SN-53	AP-42	Standard Natural Gas Standard Fuel Oil	None	None	

SN	Emission Factor Source	Emission Factor and units	Control Equipment Type	Control Equipment Efficiency	Comments
SN-55	AP-42	Standard Natural Gas Standard Fuel Oil	None	None	
SN-59	AP-42 Table 6.1.4	0.20 PM/ton Carbon Black	Dust Collector	95%	
SN-60	AP-42 Table 6.1.4	0.20 PM/ton Carbon Black	Dust Collector	95%	
SN-67	MSDS	VOC: 6.26 lb/gal (solvent) 6.28 lb/gal (cement)	None	None	
SN-68 SN-106	MSDS	VOC: 6.26 lb/gal (solvent) 0.055 lb/gal (paint)	None	None	
SN-89	AP-42 & Testing	Standard Natural Gas Standard Fuel Oil 99.7 MMBTU/hr 8760 hrs/yr (NG) 6304 hrs/yr (FO) 95.4 MCF/hr (NG) Nat. Gas Factors 10 lb PM/MMCF 1.2 lb SO ₂ /MMCF 10 lb VOC/MMCF 84 lb CO/MMCF 73.2 lb NO _x /MMCF Fuel Oil Factors: 6 lb PM/kgal 142(.03) lb SO ₂ /kgal 0.75 lb VOC/kgal 25 lb CO/kgal 22.4 lb NO _x /kgal	None	None	
SN-108	RMA	30 ton/hr throughput 70% of rubber, milled 50% compd #6a mixed 1.1E-4 lbcompd#2/lbrubber 0.00371 lbcompd#6a/lbrubber	None	None	
SN-109	RMA	VOC: 4.2E-5 lb/lb rubber	None	None	
SN-110	RMA	30 ton/hr thurput 40% of rubber, calendered 5.59E-5 lbcompd#2/lbrubber	None	None	
SN-111	RMA	VOC: 3.37E-4 lb/lb rubber	None	None	
SN-121	MSDS	Various	None	None	
SN-140 and SN-141	AP-42	See Section 3.3 Tables 3.3-1 and 3.3-2	None	None	

13. TESTING REQUIREMENTS:

The permit does not require testing.

14. MONITORING OR CEMS:

The permit does not require CEMS or other monitoring equipment.

15. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

Source	Recorded Item	Limit (as established in permit)	Frequency	Report (Y/N)
GR-01, SN-109, SN-111	Final Rubber Processed (Mixed & Imported)	220,000 tons/yr	Monthly	Y
GR-01, SN-109, SN-111	Silica Usage	7,000 tons/yr	Monthly	Y
GR-03, GR-04, GR-05, GR-06	Treads/Tires Processed	17,000,000 treads/yr	Monthly	Y
GR-03	VOC Emissions per Tread	7.5 grams/tread/month	Monthly	Y
	VOC Content	Listed in Table	Annually	N
GR-04	VOC Emissions of Inside Paint	1.0 grams/tread/month	Monthly	Y
	VOC Emissions of Outside Paint	1.0 grams/tread/month	Monthly	Y
GR-08	Ink Throughput	800 gallons/yr	Monthly	Y
	Solvent Throughput	100 gallons/yr	Monthly	Y
	Ink/Thinner VOC Content	Listed in Table	Annually	N
SN-53	Fuel Oil Throughput	1,388,475 gallons/yr	Monthly, as used	Y
	Sulfur Content	0.3 Weight %	As needed	N
SN-55	Fuel Oil Throughput	2,766,950 gallons/yr	Monthly, as used	Y
	Sulfur Content	0.3 Weight %	As needed	N
SN-59 SN-60	Carbon Black	80,000 Tons Total both sources	Monthly	Y
SN-67	Cement	650 Gallons	Monthly	Y
	Solvent	2,000 Gallons	Monthly	Y
	Solvent & Cement VOC Content	Listed in Table	Monthly	N
SN-68, SN-106	Solvent	650 Gallons	Monthly	Y
	Solvent & Paint VOC Content	Listed in Table	Annually	N

Source	Recorded Item	Limit (as established in permit)	Frequency	Report (Y/N)
SN-89	Fuel Oil Throughput	1,695,103 gallons/yr	Monthly, as used	Y
	Sulfur Content	0.3 Weight %	As Needed	N
SN-121	All HAP containing material usage	1.17 tpy Glycol ethers 0.06 tpy Toluene 0.09 tpy Xylene	Monthly	Y
Plant	All VOC containing material usage	249 tpy VOC	Monthly	Y
	MSDS (VOC & HAP Contents)	----	As needed	N
SN-140 and SN-141	Hours of operation	500 hours per calendar year	Per Event	Y

16. OPACITY:

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism
GR-01 through GR-06	20	Dept Guidance	EPA Method 9
07	20	Dept Guidance	EPA Method 9
53	5	Dept Guidance-NG	EPA Method 9 Burn only Nat. Gas
53	20	Dept Guidance Fuel Oil	E[Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and CFR Part 52, Subpart E]PA Method 9
55	5	Dept Guidance –NG	EPA Method 9 Burn only Nat. Gas
55	20	Dept Guidance Fuel Oil	EPA Method 9
89	5	Dept Guidance - NG	EPA Method 9
89	20	NSPS Dc – Fuel Oil	Continuous – CEMS
140 and 141	20%	Dept Guidance	Annual Observation

17. DELETED CONDITIONS:

No condition was deleted with this revision.

18. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)			
		VOC	PM ₁₀	HAPs	
				Single	Total
Two (2) 6,000 gallon Naphthenic Petroleum Oil Storage Tanks #1 and #4	A-3	0.074			
1,000 gallon No. 2 Fuel Oil Day Tank	A-3	<0.01			
10,000 gallon Naphthalic Petroleum Oil Storage Tank #6	A-3	0.069			
Three (3) 10,000 gallon Aromatic Petroleum Hydrocarbon Storage Tanks #8, #9, and #10	A-3	<0.01			
10,000 gallon Naphthenic Process Oil Blend Tank #29	A-3	<0.01			
Dust Ring Lube Oil Tank #12	A-3	0.02			
500 gallon Fire Pump Tank #1	A-3	<0.01			
500 gallon Fire Pump Tank #2	A-3	<0.01			
Group A-3 Total		0.173			
Quality Control and Materials testing Lab	A-5	0.02			<0.01
Group A-15 Total		0.02			<0.01
White Side Wall Protective Painters	A-9	0.25	0.27		0.061
Mold and Bladder Lube Application	A-9	<0.01			<0.01
Group A-19 Total		0.26	0.27		<0.01
Two (2) 30,000 gallon Fuel Oil Storage Tanks	A-13	<0.01			
Air Compressor #1			0.04		
Air Compressor #2			0.04		
Process Water #1			0.113		
Process Water #2			0.113		
Process Water #3			0.113		
#1 HVAC Tower			0.082		
#2 HVAC Tower			0.082		
#3 HVAC Tower			0.265		
#4 HVAC Tower			0.265		
Group A-13 Total		<0.01	1.11		

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

List all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
0957-AOP-R12

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 08-26-15

Facility Name: Cooper Tire & Rubber Company
 Permit Number: 957-AOP-R13
 AFIN: 46-00005

\$/ton factor	23.93	Annual Chargeable Emissions (tpy)	543.81715
Permit Type	Modification	Permit Fee \$	1000

Minor Modification Fee \$	500
Minimum Modification Fee \$	1000
Renewal with Minor Modification \$	500
Check if Facility Holds an Active Minor Source or Minor Source General Permit	<input type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	6.8
Initial Title V Permit Fee Chargeable Emissions (tpy)	

HAPs not included in VOC or PM:

Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride

Air Contaminants:

All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensable PM, H2S in TRS, etc.)

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		47.7	48.2	0.5		
PM ₁₀		47.7	48.2	0.5	0.5	48.2
SO ₂		125.3	125.8	0.5	0.5	125.8
VOC		249	249	0	0	249
CO		84.6	86	1.4		
NO _x		108.2	114	5.8	5.8	114
Lead Compounds	<input type="checkbox"/>	0.04453	0.04453	0		
Methylene Chloride	<input checked="" type="checkbox"/>	5.35415	5.35415	0	0	5.35415

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Tetrachloroethene	<input checked="" type="checkbox"/>	1.463	1.463	0	0	1.463