ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation #26:

Permit #: 957-AOP-R3

IS ISSUED TO:

The Cooper Tire Company,
A Division of Cooper Tire & Rubber Company
3500 East Washington Road
Texarkana, AR 71854
Miller County
AFIN: 46-00005

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

	May 17, 1999	and	May 16, 2004
AND IS SU	BJECT TO ALL LIMITS	S AND CONDITION	IS CONTAINED HEREIN.
Signed:			

Date Modified

Keith A. Michaels

SECTION I: FACILITY INFORMATION

PERMITTEE: The Cooper Tire Company

A Division of Cooper Tire & Rubber Company

AFIN: 46-00005

PERMIT NUMBER: 957-AOP-R3

FACILITY ADDRESS: 3500 East Washington Road

Texarkana, AR 71854

COUNTY: Miller

CONTACT POSITION: David A. Thomas, Environmental Coordinator

TELEPHONE NUMBER: (870) 779-4260

REVIEWING ENGINEER: Amanda Holloway

UTM North-South (Y): 3,700 km UTM East-West (X): 405 km

Zone 15

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SECTION II: INTRODUCTION

Summary of Permit Activity

Cooper Tire & Rubber Company (Cooper) operates a tire manufacturing plant in Texarkana, Arkansas. This minor modification will increase the permitted emission rates of VOC from SN-109. The increase is attributed to the use of a new rubber compound, known as Compound 6a, which is used in producing silica-based tire tread components. This modification will result in an emissions increase of 7.7 tpy of VOC.

Process Description

Cooper receives (SN-59) dry materials, such as carbon black, and liquid raw materials in both bulk and packaged forms. These materials are stored either in the plant or in the bulk storage facilities at the south end of the plant (SN-59 or SN-72). Raw materials which include dry ingredients, carbon black, natural rubber, synthetic rubber, and process oils are formulated and mixed in five Farrel F-270 Banbury mixers, and one Farrel F-370 Banbury mixer, or the Stewart-Bolling Size 10 mixer (GR-01). Dry ingredients, other than carbon black, are individually weighed to specified formulations and batched in plastic bags in the central compounding area (SN-07) and then transported to the mixers.

The rubber mixing process includes two-steps: master mixing and final mixing. Three of the mixers are equipped with extruders that produce small rubber pellets. The pellets are coated with a de-tackifier and cooled with air (GR-02). Later, the pellets are transported to the final mixer with additional ingredients for final mixing.

Carbon black and other dry ingredients introduce dust at the opening to the mixer throat. Individual roof mounted dust collectors are ducted to the mixers and control dust exiting the mixers.

After the rubber is final mixed and layered into sheet form onto steel skids, it is transported to cold feed extruders or to rubber mills (SN-108). The rubber is broken down further on the mills for presentation to various calenders (SN-110) and other extruders (SN-109).

The four-roll "Z" calender processes fabric-woven material for tire belt and body ply production. The fabric material is treated in a latex dip solution to promote adhesion between the rubber and fabric. After application of latex dip, the fabric moves through a vertical gas-fired oven at a controlled tension (GR-07).

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Some of the calendered material will be routed to the pre-cure treatment system. The pre-cure process is in line with the calender (SN-56). The pre-cure system uses two electron beam accelerators to irradiate tire components and initiate the rubber curing process. Electrons are accelerated by means of electromagnetic fields and are directed to uncured tire components. Electrons moving towards the tire components encounter oxygen molecules in the air. When the electrons strike the oxygen molecules, some of the molecules are split to single oxygen atoms. The single oxygen atoms will re-attach to existing diatomic molecules to form ozone (O_3) if other single oxygen atoms are unavailable.

Creeled steel material feeds into a separate calender without dip application or oven drying. After calendering, the material is rolled up on steel shells and transported to cord storage areas.

The twin two-roll calender laminates thin sheets of rubber for innerliner and other miscellaneous tire components which are transported to the Tire Building Department.

The fabric cutters process rolls of calendered tire belt and ply material into narrower rolls of material cut at a specified angle, spliced, and wound on reels. These reels are then transported to the Tire Building Department.

The tread tubers extrude tread rubber, which is then cut to specified lengths and marked with an identifying code at the tread markers (GR-08). After the treads are cut to length, the exposed ends are sprayed with a solvent-based rubber cement by an automatic tread end cementer (GR-03). Cement is applied manually via a brush when the automatic cementers are shut down. Next the treads are placed in trays on a tread truck and transported to the Tire Building Department.

Four sidewall lines extrude black and white sidewall components. The sidewall package is rolled up on reels and transported to the Tire Building Department.

Bead room equipment processes wire and extruded rubber into a circular tire bead. The beads are then transported to the Tire Building Department

All components from the millroom, bead room, and fabric cutters are manually brought to the Tire Building Department for assembly. The components are assembled in specified sequence on various types of tire building machines (SN-67).

Radial tires are assembled in two stages. The radial "carcass" is assembled on a 1st stage tire building machine. The carcass is then transported on racks to the 2nd stage tire building machines. After completing the 2nd stage construction, the "green" tires are transported to the radial green tire spray booths.

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All green tires are routed by conveyors to spray booths. The green tire receives a coating of water-based lubricant on the inside and outside surfaces of the tire (GR-04). The sprayed tires are then sorted in portable racks of common tires and are transported to green tire storage areas.

Green tires are moved from storage areas to the curing presses where they undergo controlled temperature and pressure vulcanization (curing) (SN-111).

Curing bladders are treated with a lubricant prior to installation in the curing process. In addition, some curing molds are lubricated between curing cycles. The curing molds periodically become fouled and require cleaning in a mold cleaner (SN-95 and SN-112).

Cured tires are inspected and the white sidewall (WSW) tires are routed to various automatic WSW buffers (GR-06). WSW tires must be buffed to remove the black rubber veneer coating over the sidewall. The dust from this operation is collected by nine wet-type dust collectors.

After WSW buffing, these tires merge with the black sidewall (BSW) tires and are routed to inspectors who visually inspect for defects, make necessary repairs (SN-68), and then route the tires to various sorting conveyors. Some tires are routed to the Tire Reclass Area (SN-106).

After inspection, the tires are sent to the uniformity machines. If specified uniformity force values are not met, the tire shoulder and/or tread area is ground (GR-05). The grinding "dust" is captured by cyclone type dust collectors, one for each uniformity machine. Ground tires are further cleaned at the Uniformity Grind Cleaning Area (SN-105).

After uniformity testing, the tires are sent to the four RAM painters (SN-33 through 36) where the white sidewalls are painted with a water-based protective paint, dried with radiant heaters on a drying conveyor, and routed to the automatic balancers where they are checked for balance.

After leaving the automatic balancers, tires are conveyed to the sort and label area where they are routed to various sort lines, labeled, and loaded onto cart pallets. The pallets are stretch wrapped and then sent to the warehouse.

Cooper also operates three boilers that provide building heat and steam for the processes (SN-53, SN-55, and SN-89). The boilers are equipped to burn either natural gas or No. 2 fuel oil with natural gas being the primary fuel.

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Regulations

This facility is considered a major stationary source under the PSD regulations. The facility is subject to regulation under the Regulation 18 - Arkansas Air Pollution Control Code (Air Code), Regulation 19 - Regulations of the Arkansas Plan of Implementation for Air Pollution Control (SIP) and Regulation 26 - Regulations of the Arkansas Operating Air Permit Program (Title V). Cooper Tire is also subject to regulation under 40 CFR 60 New Source Performance Standards (NSPS) Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units and Subpart BBB - Rubber Tire Manufacturing Industry.

Emission Summary

The following table is a summary of emissions from the facility. Specific conditions and emissions for each source can be found starting on the page cross referenced in the table. This table, in itself, is not an enforceable condition of the permit.

	EN	MISSION SUMMARY	Y		T	
Source No.	Description	Pollutant	Emis Ra		Cross Reference	
			lb/hr	tpy	Page	
Total A	llowable Emissions	PM PM ₁₀ SO ₂ VOC CO NO _x Acetophenone Acrolein Aniline 1,3 Butadiene Carbon Disulfide Carbonyl Sulfide	21.2 21.2 69.5 171.6 28.5 35.2 0.20 0.05 0.46 0.05 1.77 0.10	51.3 51.3 128.8 476.0 83.9 110.4 0.87 0.18 1.99 0.17 7.74 0.42		
		1,2 Dibromo-2 Chloropropane Diethylene Glycol- Mono Butyl Ether Ethyl Benzene	0.03 0.41 0.51	0.11 1.50 1.20		

	EN	MISSION SUMMARY	Y		
Source No.	Description	Pollutant	Emis Ra		Cross Reference Page
			lb/hr	tpy	rage
		Formaldehyde Glycol Ethers Hexane Methanol MEK 4-Methyl-2- Pentanone (MIK) Methylene Chloride* Phenol Styrene Toluene	0.19 0.31 24.33 6.38 1.56 1.84 0.79 0.06 2.58 15.52 4.96	0.46 0.74 58.51 15.68 3.66 8.05 3.46 0.23 6.89 40.80 18.05	
		Xylene			
GR-01	Mixing (SN-01 through SN-06, SN-51) Baghouse	PM PM ₁₀ VOC Carbon Disulfide Carbonyl Sulfide 4-Methyl-2- Pentanone Phenol Styrene	1.2 1.2 2.4 0.23 0.10 1.84 0.01 0.26	5.3 5.3 10.1 1.01 0.42 8.05 0.02 1.12	19
GR-02	Pellet Coolers (SN-40, SN-52, SN-61) Baghouse	PM PM_{10}	1.2 1.2	5.3 5.3	21
GR-03	Tread End Cementers (SN-08, SN-09, SN-115, SN-118)	PM PM ₁₀ VOC Ethyl Benzene Hexane	0.6 0.6 69.2 0.50 24.01	2.7 2.7 166.0 1.19 57.74	22

	EN	MISSION SUMMAR	Y		T
Source No.	Description	Pollutant	Emis Rat		Cross Reference Page
			lb/hr	tpy	1 age
		Xylene	1.85	4.42	
GR-04	Radial Green Tire Spray Booths (SN-14 through SN-19)	PM PM ₁₀ VOC	6.3 6.3 18.5	15.1 15.1 44.3	25
GR-05	Tire Uniformity Machines & Cleaning Area (SN-20 through SN-28, SN-43 through SN-46, SN-78, SN-79, SN-82 through SN-86, SN-105, SN-119, SN-120)	PM PM ₁₀ VOC	2.2 2.2 0.9	5.3 5.3 2.0	27
GR-06	White Sidewall Buffers (SN-29 through SN-32, SN-47, SN-48, SN-69 through SN-71, SN-80, SN-96 through SN-104)	PM PM ₁₀ VOC	2.9 2.9 5.7	6.9 6.9 13.6	29
GR-07	Calender Dip System (SN-62 through SN-64)	$\begin{array}{c} PM \\ PM_{10} \\ SO_2 \\ VOC \\ CO \\ NO_X \\ 1,3 \text{ Butadiene} \\ Formaldehyde \end{array}$	0.2 0.2 0.1 13.7 0.9 2.4 0.02 0.19	0.5 0.5 0.1 38.6 4.0 10.5 0.04 0.46	31

	EN	MISSION SUMMARY	Y		·
Source No.	Description	Pollutant	Emis Ra		Cross Reference Page
			lb/hr	tpy	1 age
		Methanol Styrene	6.38 2.26	15.68 5.54	
GR-08	Tread Markers (SN-65, SN-66, SN-116, SN-117)	VOC Diethylene Glycol- Mono Butyl Ether	2.4 0.41	8.6 1.50	34
GR-09	No. 2 Fuel Oil Tanks (SN-57, SN-58, SN-77)	VOC	0.1	0.4	36
07	Centralized Compounding	${ m PM} \over { m PM}_{10}$	0.1 0.1	0.3 0.3	37
10	Tuber Cementer #4]	Removed		
11	Tuber Cementer #5]	Removed		
12	Tuber Cementer #6]	Removed		
13	Bead Dip Tank]	Removed		
33	White Sidewall Protective Painter #1	Insignificant			
34	White Sidewall Protective Painter #2	Insignificant			
35	White Sidewall Protective Painter #3	Insignificant			
36	White Sidewall Protective Painter	In	significar	nt	

	EM	IISSION SUMMAI	RY		
Source No.	Description	Pollutant Emission Rates I		Cross Reference Page	
			lb/hr	tpy	1 age
	#4				
37	WSW Buffer Protective Painter #5		Removed		
38	WSW Buffer Protective Painter #6		Removed		
39	WSW Buffer Protective Painter #7	Removed			
41	Fuel Oil Storage Tank	Removed			
42	Dust Ring Lube Oil Tank]	Insignificar	nt	
49	WSW Buffer Protective Painter #8	Removed			
50	WSW Buffer Protective Painter #9	Removed			
53	Boiler #1	PM PM ₁₀ SO ₂ VOC CO NO _x	0.6 0.6 11.3 0.2 2.9 5.3	1.4 1.4 29.6 0.9 12.7 21.2	38
54	Boiler #2		Removed		

	EN	MISSION SUMMARY	Y		
Source No.	Description	Pollutant	Emis Ra		Cross Reference Page
			lb/hr	tpy	rage
55	Boiler #3	PM PM ₁₀ SO ₂ VOC CO NO _x	1.1 1.1 22.6 0.4 5.8 10.6	2.8 2.8 59.2 1.8 25.4 42.3	41
56	Precure Treatment	In	significar	nt	
59	Carbon Black Unloading/ Distribution System	PM PM_{10}	0.2 0.2	0.6 0.6	44
60	Cement House]	Removed		
67	Tire Building Area	VOC Styrene	15.1 0.01	35.0 0.03	46
68, 106	Tire Inspection/Repair Area	VOC MEK Styrene Toluene	17.2 1.55 0.01 13.40	40.9 3.65 0.01 31.56	48
72	Solvent Storage Tanks	VOC	0.1	0.5	51
73	Process Oil Storage Tanks	Insignificant			
74	Process Oil Storage Tanks	Insignificant			
75	Latex Storage Tanks	In	significar	nt	

	EM	MISSION SUMMAR	Y		
Source No.	Description			Cross Reference	
			lb/hr	tpy	Page
76	Process Oil Storage Tanks	Ir	nsignificar	nt	
81	WSW Buffer Protective Painter #10		Removed		
89	Boiler #4	PM PM ₁₀ SO ₂ VOC CO NO _x	4.6 4.6 35.5 1.2 18.9 16.9	5.1 5.1 39.9 5.0 41.8 36.4	52
90	Process Oil & Stearic Acid Storage Tanks	Insignificant			
91	Mobile Vacuum Unit	Ir	nsignificar	nt	
92	Bladder Spray Booth #1	Ir	nsignificar	nt	
93	Bladder Spray Booth #2	Insignificant			
94	Mold Lube	Ir	nsignificar	nt	
95	Mold Cleaner	Ir	nsignificar	nt	
107	Rubber Mixing	Emissions R	outed Thr	ough GR	R-01
108	Rubber Milling	Ir	nsignificar	nt	
109	Rubber Extruding	VOC Acetophenone	2.6 0.20	11.1 0.87	55

	EN	MISSION SUMMARY	Y		T
Source No.	Description	Pollutant	Emis Ra		Cross Reference Page
			lb/hr	tpy	rage
		Acrolein 1,3 Butadiene Methylene Chloride Toluene	0.02 0.03 0.79 0.56	0.08 0.13 3.46 2.43	
110	Rubber Calendering	In	significar	nt	
111	Tire Curing	VOC Acrolein Aniline Carbon Disulfide 1,2 Dibromo-2 Chloropropane Phenol Toluene M-Xylene and P- Xylene	20.2 0.03 0.46 1.54 0.03 0.04 1.55 3.10	88.7 0.10 1.99 6.73 0.11 0.16 6.79 13.60	57
112	Mold Cleaner	In	significar	nt	
121	Miscellaneous Plant-wide Use of Volatile Materials	VOC Ethyl Benzene Glycol Ethers Hexane MEK Toluene Xylene	3.5 0.01 0.31 0.32 0.01 0.01 0.01	8.5 0.01 0.74 0.77 0.01 0.02 0.03	59

^{*} Not included in VOC total.

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SECTION III: PERMIT HISTORY

Permit **957-A** was issued on September 7, 1989. This was the first air permit issued to the facility. The facility has been in operation since 1964.

Permit **957-AR-1** was issued to Cooper on April 9, 1990. This modification established emission values for VOC in the buffer painters (SN-33 through SN-39, SN-49, and SN-50) and increased the VOC emissions for the outside paint per tire in the Green Tire Spray Booths (SN-14, SN-18, and SN-19).

Permit **957-AR-2** was issued to Cooper on July 15, 1991. This modification replaced the existing dust collector for Mixer #1 (SN-01) with a "Jet-Aire" bag filter. Cooper also added eight additional holding bins to support an increase in operating rates for the Centralized Compounding System (SN-07), a pre-cure system (SN-56a and SN-56b), two 30,000 gallon No. 2 fuel oil tanks (SN-57 and SN-58), and nineteen previously unpermitted, but installed, sources (SN-59 through SN-77). This permit removed the No. 4, No. 5, and No. 6 Tuber Cementers (SN-10 through SN-12), the No. 1 Bias Green Tire Spray Booth, and a 12, 000 barrel tank (SN-41). Cooper recalculated, using new data, the emission rates and throughput rates to give a net result of a 1,111 TPY reduction in VOC and a 13.6 TPY increase in particulates.

Permit **957-AR-3** was issued on February 25, 1992. This modification was to relocate SN-44 through SN-50, replace the No. 1 Tread End Cementer (SN-08) with a like-kind replacement that is subject to New Source Performance Standard Subpart BBB, install an additional white sidewall buffer protective painter exhaust/filter system, and replace the No. 5 Mixer Dust Collector. This modification also installed two new tire uniformity machines (SN-78 and SN-79), installed a new sidewall buffer (SN-80), installed a new buffer protective painter (SN-81), and replaced the existing white sidewall dust collectors (SN-47 and SN-48) with a newer larger dust collector. Total increases were 0.9 TPY of particulates and 0.3 TPY of VOC.

Permit **957-AR-4** was issued on April 27, 1994. This modification changed the opacity limits for SN-61, SN-63, SN-64A, SN-64B, SN-64C, SN-69, SN-70, and SN-71. It also added dust blow-offs for all of the tire uniformity machines (SN-20 through SN-28, SN-43 through SN-46, SN-78, and SN-79). The SO₂ emissions from the boilers while using No. 2 fuel oil were increased to rectify an error made in 957-A. This modification added two insignificant cementing operations, replaced the No. 2 Tread End Cementer (SN-09) with a like kind, and exchanged the source numbers on SN-18 and SN-19. Permitted limits were increased on SN-14 through SN-28, SN-40, SN-78 and SN-79. Three new tire uniformity machines (SN-82, SN-83, and SN-84) were added. A like-kind replacement of the No. 1 and No. 2 tread markers (SN-65 and SN-66) was performed.

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Permit **957-AR-5** was issued to Cooper on August 16, 1994. This modification allowed for installation of four new Tire Uniformity Machines (SN-85 through SN-88), replacement of an exhaust fan on the No. 7 pellet cooler (SN-52), replacement of the exhaust fan on the 4 Roll Calender Oven (SN-64B), renovations to the exhaust system from existing laboratory equipment, and minor corrections to 957-AR-4. This resulted in a increase of 2.4 TPY of particulates, 2.6 TPY of SO₂, 3.5 TPY of VOC, 0.9 TPY of CO, and a decrease of 0.5 TPY of NO_X.

Permit **957-AR-6**, issued on October 17, 1994, allowed the installation of a 90,000 pound per hour steam generating boiler (SN-89). Heat input capacity of the boiler is 119 MMBTU/hr and, therefore, the unit is subject to 40 CFR 60, Subpart Db. Natural gas is the primary fuel for the boiler, however No. 2 fuel oil will be used as an alternate and emergency fuel.

Permit **957-AR-7** was a minor modification issued on May 2, 1995. This modification allowed for replacement of rotors in SN-01 and SN-04, moving the No. 3 and No. 5 Green Tire Spray Booths (SN-16 and SN-19), and replacing the No. 1 and No. 4 Pellet Coolers (SN-40 and SN-61). It also added three new 10,000 gallons storage tanks (SN-90), a mobile vacuum unit (SN-91), the No. 1 and No. 2 Bladder Spray Booths (SN-92 and SN-93), a Mold Lube (SN-94), and a Mold Cleaner (SN-95). Total permitted increases resulting from 957-AR-7 were 1.6 tons per year of PM₁₀ and 2.8 tons per year of VOCs.

Permit 957-AR-8, issued on November 27, 1995, allowed the replacement of the existing radial green tire spray booth with a new, similar radial green tire spray booth. Cooper Tire reduced the bead dip usage at the bead dip tank and reduced permitted limits on bead dip usage in this modification. Finally, Cooper removed Boiler No. 2 (SN-54) and the emissions associated with the boiler. In addition, this permit assigned emissions limits in pounds per hour and tons per year to sources that were previously permitted in gr/tire/month which is the means of measuring compliance with the applicable NSPS Subpart. A Specific Condition to address NSPS compliance was added to the permit along with other conditions to ensure compliance with proposed emissions rates. Total permitted decreases resulting from 957-AR-8 were 0.2 tons per year PM₁₀, 135.1 tons per year VOC, 27.5 tons per year SO₂, 22.3 tons per year NO_X, and 5.7 tons per year CO.

Permit **957-AR-9** was issued to Cooper on September 20, 1996. This modification allowed for relocation and replacement of the dust collectors on the Tire Uniformity Machines and three White Sidewall Buffers (SN-47, SN-48, and SN-80). It allowed for installation of nine and removed seven White Sidewall Buffers. It also allowed for installation of four and removed ten Sidewall Protective Painters. It allowed installation of a new Grind Cleaning Area (SN-105), fans and dust filter in the Inspection Area (SN-68), and a new dust collector in the Tire Reclass Area (SN-106). It also allowed for replacement of a Radial Green Tire Spray Booth (SN-17) with a new NSPS subject model. Finally, this permit updated emission factors.

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Permit **957-AOP-R0**, which was the first operating permit for Cooper under Regulation #26, was issued on May 17, 1999. This permit allowed for installation of a new tread line to replace an existing tread line to allow for a higher production rate, while lowering VOC emissions from the old tread line and also replacement of two of the sidewall component lines. Other emissions changed by using updated emission factors and increasing throughput limits.

Permit 957-AOP-R1 was a modification which allowed for the installation of a new tread line, the #2CF Tread Line and Tread End Cementer (SN-118 grouped in GR-03), the replacement of two existing radial green tire spray booths with new booths (GR-04), the installation of two new tire uniformity machines (GR-05), the installation of a number of new tire curing presses (SN-111), a change in emission factors for cements and solvents, a change in solvent usage amount, and an increase in rubber throughput associated with a change in the hours of operation at the facility.

The increases in emissions from this modification were because of the addition of new equipment, changes in solvents through approved unrelated minor modifications, and an increase in rubber throughput because of a change in the hours of operation at this facility. The rubber throughput increased from 166,347 tons per year to 262,800 tons per year. The throughput was established in Permit 957-AOP-R0 for existing equipment and was not a New Source Review permit limit. This modification allowed the facility to operate continuously. The change in hours of operation resulted in an increase of VOC emissions by 74 tons per year. This facility has never had production limits for New Source Review purposes. The plant production capacity was limited by the number of curing presses in the plant. The 13 press expansion did result in an increase in VOC emission of 32.6 tons per year. Therefore, the facility's modification was not subject to PSD regulations.

Permit **957-AOP-R2** was a minor modification which allowed the facility to improve the particulate dust collection and ventilation systems for Mixing (GR-01) and Pellet Coolers (GR-02). The improvements were made by re-sizing the ductwork and hoods, increasing air flow for the existing dust collectors on Mixer #7 (SN-51) and Pellet Coolers #1, #4, and #7 (SN-40, SN-52, and SN-61, respectively), and installing one additional dust collector at each of the Mixers #1 through #6 (SN-01 through SN-06). The changes to the particulate dust collection and ventilation systems did not result in an increase of permitted emissions.

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SECTION IV: EMISSION UNIT INFORMATION

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GR-01 Mixing (SN-01 through SN-06, SN-51)

Source Description

The Mixing Group includes No. 1 Mixer through No. 7 Mixer (SN-01 through SN-06 and SN-51). Natural and synthetic rubber, carbon black, process oil, curing agents, and other dry ingredients are combined in these mixers to form the different rubber compounds used in the plant. Mixers 1 through 7 (SN-01 through SN-06, and SN-51) are each equipped with fabric filter dust collectors. The emissions from Mixers 1 through 7 are bubbled together as one set of emission rates.

Emissions from the Mixing Group include various hazardous air pollutants. The Rubber Manufacturers Association has determined emission factors for all of the emitted HAPs. The significance of each HAP was determined by multiplying the calculated hourly emission rate by 4.38 (8760 hours per year divided by 2000 pounds per ton) and comparing that value with the relative toxicity. The significant emissions were then evaluated according to the Department's Non-Criteria Pollutant Strategy.

Specific Conditions

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #4 and equipment limitations.

Pollutant	lb/hr	tpy
PM_{10}	1.2	5.3
VOC	2.4	10.1

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2. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #4 and equipment limitations.

Pollutant	lb/hr	tpy
Carbon Disulfide	0.23	1.01
Carbonyl Sulfide	0.10	0.42
4-Methyl-2- Pentanone	1.84	8.05
Phenol	0.01	0.02
PM	1.2	5.3
Styrene	0.26	1.12

- 3. Pursuant to §18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 20% opacity from GR-01 as measured by EPA Reference Method 9. Compliance with this condition will be demonstrated by Plantwide Condition #8.
- 4. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not mix in excess of 262,800 tons of final mixed rubber from GR-01 during any consecutive twelve month period.
- 5. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #4. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7.

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GR-02 Pellet Coolers (SN-40, SN-52, SN-61)

Source Description

The Pellet Cooler Group includes the #1, #4, and #7 Pellet Coolers (SN-40, SN-61, SN-52). The rubber from several of the master mixers (Mixers #1, #4, and #7) is extruded into rubber pellets. These pellets are then dipped in a clay, water-based solution to detackify the pellets. The hot rubber pellets are conveyed to the pellet cooler where they are cooled.

Specific Conditions

6. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #4 and equipment limitations.

Pollutant	lb/hr	tpy
PM ₁₀	1.2	5.3

7. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #4 and equipment limitations.

Pollutant	lb/hr	tpy
PM	1.2	5.3

8. Pursuant to §18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 20% opacity from GR-02 as measured by EPA Reference Method 9. Compliance with this condition will be demonstrated by Plantwide Condition #8.

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GR-03 Tread End Cementers (SN-08, SN-09, SN-115, and SN-118)

Source Description

This group includes #1 and #2 Tread End Cementers and #1CF and #2CF Tread End Cementers (SN-08, SN-09, SN-115, and SN-118). All extruded tread that meet specifications receive an application of tread end cement on the tread ends. Each tread line station is equipped with a manual and automatic tread end cement station. However, only one station is operated at a time. The automatic station consists of a spray booth, which exhausts to the atmosphere. The manual station consists of an operator manually brushing the cement on the tread ends. This group is subject to New Source Performance Standards, Subpart BBB-Rubber Tire Manufacturing Industry.

Specific Conditions

9. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Conditions #12, #14, #16 and equipment limitations.

Pollutant	lb/hr	tpy
PM_{10}	0.6	2.7
VOC	69.2	166.0

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10. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Conditions #12, #14, #16, and equipment limitations.

Pollutant	lb/hr	tpy
Ethyl Benzene	0.50	1.19
Hexane	24.01	57.74
PM	0.6	2.7
Xylene	1.85	4.42

- 11. Pursuant to §18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 20% opacity from GR-03 as measured by EPA Reference Method 9. Compliance with this condition will be demonstrated by Plantwide Condition #8.
- 12. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not process in excess of 20,075,005 treads from GR-03 during any consecutive twelve month period.
- 13. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #12. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7.
- 14. Pursuant to 40 CFR 60 Subpart BBB Rubber Tire Manufacturing Industry, the permittee shall not emit greater than 7.5 grams/tread/month of VOC at GR-03. Cooper has currently proposed and is permitted based on a limit more strict than this subpart requires.

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- 15. Pursuant to §19.705 of Regulation #19, 40 CFR Part 52, Subpart E, and 40 CFR 60 New Source Performance Standards Subpart BBB Rubber Tire Manufacturing Industry, the permittee shall maintain records which demonstrate compliance with Specific Condition #14 and the NSPS standard. The records shall be updated on a monthly basis. These records shall be kept on site, provided to Department personnel upon request, and may be used by the Department for enforcement purposes. Each month's individual data shall be submitted to the Department in accordance with General Provision #7.
- 16. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not exceed the tread end cement VOC and HAP contents listed in the following table at GR-03.

Component	Weight Percent
VOC	100%
Ethyl Benzene	0.66%
Hexane	32.0%
Xylene	2.45%

17. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records and MSDS sheets which demonstrate compliance with the limits set in Specific Condition #16. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request.

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GR-04 Radial Green Tire Spray Booths (SN-14 through SN-19)

Source Description

This group includes Radial Green Tire Spray Booths #5, #2, #1, #4, #6, and #3 (SN-14 through SN-19 respectively). Each green tire or uncured tire receives a coating of green tire spray on the inside and outside. This group is subject to New Source Performance Standards, Subpart BBB-Rubber Tire Manufacturing Industry.

Specific Conditions

18. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Conditions #12, #21, #23, and equipment limitations.

Pollutant	lb/hr	tpy
PM_{10}	6.3	15.1
VOC	18.5	44.3

19. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Conditions #12, #21, #23, and equipment limitations.

Pollutant	lb/hr	tpy
PM	6.3	15.1

20. Pursuant to §18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 20% opacity from GR-04 as measured by EPA Reference Method 9. Compliance with this condition will be demonstrated by Plantwide Condition #8.

- 21. Pursuant to 40 CFR 60 New Source Performance Standards Subpart BBB Rubber Tire Manufacturing Industry, the permittee shall not emit greater than 1.0 grams/tire/month of VOC from the Inside Paint at GR-04. Cooper has currently proposed and is permitted based on a limit more strict than this subpart requires.
- 22. Pursuant to §19.705 of Regulation #19, 40 CFR Part 52, Subpart E, and 40 CFR 60 Subpart BBB, the permittee shall maintain records which demonstrate compliance with Specific Condition #21 and the NSPS. The records shall be updated on a monthly basis. These records shall be kept on site, provided to Department personnel upon request, and may be used by the Department for enforcement purposes. Each month's individual data shall be submitted to the Department in accordance with General Provision #7.
- 23. Pursuant to 40 CFR 60 New Source Performance Standards Subpart BBB Rubber Tire Manufacturing Industry, the permittee shall not emit greater than 1.0 grams/tire/month of VOC from the Outside Paint at GR-04. Cooper has currently proposed and is permitted based on a limit more strict than this subpart requires.
- 24. Pursuant to §19.705 of Regulation #19, 40 CFR Part 52, Subpart E, and 40 CFR Subpart BBB, the permittee shall maintain records which demonstrate compliance with Specific Condition #23 and the NSPS. The records shall be updated on a monthly basis. These records shall be kept on site, provided to Department personnel upon request, and may be used by the Department for enforcement purposes. Each month's individual data shall be submitted to the Department in accordance with General Provision #7.

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GR-05

Tire Uniformity Machines & Cleaning Area (SN-20 through SN-28, SN-43 through SN-46, SN-78, SN-79, SN-82 through SN-86, SN-105, SN-119, and SN-120)

Source Description

This group includes LTX and Passenger Tire Uniformity Optimizers (TUO) (SN-20 through SN-28, SN-43 through SN-46, SN-78, SN-79, SN-82 through SN-86, SN-119, and SN-120) and the Grind Cleaning Area (SN-105). All tires enter the TUOs, however only those that do not meet specifications are ground.

Emissions from the Tire Uniformity Machines & Cleaning Area include various hazardous air pollutants. The Rubber Manufacturers Association has determined emission factors for all of the emitted HAPs. The significance of each HAP was determined by multiplying the calculated hourly emission rate by 4.38 (8,760 hours per year divided by 2000 pounds per ton) and comparing that value with the relative toxicity. The significant emissions were then evaluated according to the Department's Non-Criteria Pollutant Strategy. The results obtained did not exceed the level of significance for any of the HAPs.

Specific Conditions

25. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #12 and equipment limitations

Pollutant	lb/hr	tpy
PM ₁₀	2.2	5.3
VOC	0.9	2.0

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26. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #12 and equipment limitations.

Pollutant	lb/hr	tpy
PM	2.2	5.3

27. Pursuant to §18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 20% opacity from GR-05 as measured by EPA Reference Method 9. Compliance with this condition will be demonstrated by Plantwide Condition #8.

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GR-06 White Sidewall Buffers (SN-29 through SN-32, SN-47, SN-48, SN-69 through SN-71, SN-80, SN-96 through SN-104)

Source Description

This group includes White Sidewall Buffers #2 through #19 (SN-29 through SN-32, SN-47, SN-48, SN-69 through SN-71, SN-80, and SN-96 through SN-104). Tires that have white sidewalls enter the White Sidewall (WSW) Buffers where the rubber veneer coating that covers the white sidewall is ground off.

Emissions from the White Sidewall Buffers include various hazardous air pollutants. The Rubber Manufacturers Association has determined emission factors for all of the emitted HAPs. The significance of each HAP was determined by multiplying the calculated hourly emission rate by 4.38 (8760 hours per year divided by 2000 pounds per ton) and comparing that value with the relative toxicity. The significant emissions were then evaluated according to the Department's Non-Criteria Pollutant Strategy. The results obtained did not exceed the level of significance for any of the HAPs.

Specific Conditions

28. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #31 and equipment limitations.

Pollutant	lb/hr	tpy
PM_{10}	2.9	6.9
VOC	5.7	13.6

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29. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #31 and equipment limitations.

Pollutant	lb/hr	tpy
PM	2.9	6.9

- 30. Pursuant to §18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 20% opacity from GR-06 as measured by EPA Reference Method 9. Compliance with this condition will be demonstrated by Plantwide Condition #8.
- 31. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not process in excess of 17,063,754 white sidewall tires from GR-06 during any consecutive twelve month period.
- 32. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #31. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7.

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> GR-07 Calender Dip System (SN-62 through SN-64)

Source Description

This group includes the Calender Dip Mixing Tanks (SN-62), the 4 Roll Calender Dip Unit (SN-63), and the 4 Roll Calender Oven (SN-64). A resin solution is mixed in the tanks. Then, polyester fabric used in the plant is dipped in the resin solution for treatment. The resin solution is commonly referred to as Poly Dip. Following dipping, the fabric is vacuumed to remove excess solution and particulate. Then, the solution/fabric are cured in an oven. The oven is fired with natural gas. Propane is used as a back-up fuel.

Specific Conditions

33. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Conditions #36, #38, #40, Plantwide Conditions #9 and #13, and equipment limitations.

Pollutant	lb/hr	tpy
PM_{10}	0.2	0.5
SO_2	0.1	0.1
VOC	13.7	38.6
СО	0.9	4.0
NO_X	2.4	10.5

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34. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Conditions #36, #38, #40, Plantwide Conditions #9 and #13, and equipment limitations.

Pollutant	lb/hr	tpy
1,3 Butadiene	0.02	0.04
Formaldehyde	0.19	0.46
Methanol	6.38	15.68
PM	0.2	0.5
Styrene	2.26	5.54

- 35. Pursuant to §18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 20% opacity from GR-07 as measured by EPA Reference Method 9. Compliance with this condition will be demonstrated by Plantwide Condition #8.
- 36. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not use in excess of 6,000 tons of fabric from GR-07 during any consecutive twelve month period.
- 37. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #36. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7.
- 38. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not use in excess of 546,000 gallons of Poly Dip from GR-07 during any consecutive twelve month period.
- 39. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #38. These records may be used by the Department for enforcement purposes. Records

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shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7.

40. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E,, the permittee shall not exceed the Poly Dip VOC and HAP contents listed in the following table at GR-07.

Component	lbs per Gallon Poly Dip
1,3 Butadiene	0.006
Styrene	0.025
Formaldehyde	0.075
Methanol	0.057

41. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records and MSDS sheets which demonstrate compliance with the limits set in Specific Condition #40. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request.

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GR-08 Tread Markers (SN-65, SN-66, SN-116, and SN-117)

Source Description

This group includes tread markers on the #1 and #2 Tread Lines and the #1CF and #2CF Tread Lines (SN-65, SN-66, SN-116, and SN-117) which consist of multiple markers on each tread line that are used to mark the tread with identifying codes. Tread marking inks with thinner/cleanup materials are applied to the tread with rollers and drip-smear applications.

Specific Conditions

42. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Conditions #44, #46, #48, and equipment limitations.

Pollutant	lb/hr	tpy
VOC	2.4	8.6

43. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Conditions #44, #46, #48, and equipment limitations.

Pollutant	lb/hr	tpy
Diethylene Glycol Mono Butyl Ether	0.41	1.50

44. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not use in excess of 1,095 gallons of ink from GR-08 during any consecutive twelve month period.

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- 45. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #44. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7.
- 46. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not use in excess of 1,095 gallons of thinner from GR-08 during any consecutive twelve month period.
- 47. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #46. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7.
- 48. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not exceed the ink and thinner VOC and HAP contents listed in the following table at GR-08.

Solution	Component	lbs per Gallon Ink/Thinner
Ink	VOC	6.52
	Diethylene Glycol Mono Butyl Ether	2.73
Thinner	VOC	9.11

49. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records and MSDS sheets which demonstrate compliance with the limits set in Specific Condition #48. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request.

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> GR-09 No. 2 Fuel Oil Tanks (SN-57, SN-58, SN-77)

Source Description

These tanks are used to store the fuel oil used at the plant. SN-57 and SN-58 are 30,000 gallon tanks, and SN-77 is a 1,000 gallon tank.

Specific Conditions

50. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Plantwide Condition #11 and equipment limitations.

Pollutant	lb/hr	tpy
VOC	0.1	0.4

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SN-07 Centralized Compounding

Source Description

Curing agents and miscellaneous dry ingredients are loaded into day bins, stored, and weighed to be used later in the rubber mixing process.

Specific Conditions

51. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #4 and equipment limitations.

Pollutant	lb/hr	tpy
PM_{10}	0.1	0.3

Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #4 and equipment limitations.

Pollutant	lb/hr	tpy
PM	0.1	0.3

53. Pursuant to §18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 20% opacity from SN-07 as measured by EPA Reference Method 9. Compliance with this condition will be demonstrated by Plantwide Condition #8.

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SN-53 Boiler #1

Source Description

Boiler #1 (SN-53) is a 36 million BTU per hour natural gas fired boiler. The boiler can also be operated using No. 2 fuel oil, if the permittee desires. This boiler is permitted to operate under alternate operating scenarios. Scenario I represents natural gas combustion and Scenario II represents No. 2 fuel oil combustion. The boiler supplies steam to the facility for heat and operation of various equipment.

Specific Conditions

54. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #58, Plantwide Conditions #9 and #11, and equipment limitations.

Pollutant	lb/hr	tpy	
Scenario I:	Scenario I: Natural Gas Combustion		
PM_{10}	0.3	1.2	
SO_2	0.1	0.1	
VOC	0.2	0.9	
СО	2.9	12.7	
NO_X	4.8	21.2	
Scenario	Scenario II: Fuel Oil Combustion		
PM_{10}	0.6	1.4	
SO_2	11.3	29.6	
VOC	0.1	0.2	
СО	1.4	3.5	
NO_X	5.3	13.9	
Total Emissions			
PM ₁₀	0.6	1.4	
SO_2	11.3	29.6	
VOC	0.2	0.9	

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Pollutant	lb/hr	tpy
СО	2.9	12.7
NO_X	5.3	21.2.

Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Plantwide Conditions #9, #11, and equipment limitations.

Pollutant	lb/hr	tpy
Scenario I: Natural Gas Combustion		
PM	0.3	1.2
Scenario II: Fuel Oil Combustion		
PM	0.6	1.4
Total Emissions		
PM	0.6	1.4

- Pursuant to §18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from SN-53 as measured by EPA Reference Method 9 when burning natural gas. Compliance with this condition will be demonstrated by Plantwide Condition #8.
- 57. Pursuant to §18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 20% opacity from SN-53 as measured by EPA Reference Method 9 when burning fuel oil. Compliance with this condition will be demonstrated by Plantwide Condition #7.
- 58. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR 60.43c(h), the permittee shall not exceed 0.30 weight percent sulfur content in the No. 2 fuel oil used to fire the boiler.
- 59. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the limits set in Specific Condition #58. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request.

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SN-55 Boiler #3

Source Description

Boiler #3 (SN-55) is a 72 million BTU per hour natural gas fired boiler. The boiler can also be operated using No. 2 fuel oil, if the permittee desires. This boiler is permitted to operate under alternate operating scenarios. Scenario I represents natural gas combustion and Scenario II represents No. 2 fuel oil combustion. The boiler supplies steam to the facility for heat and operation of various equipment.

Specific Conditions

60. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #64, Plantwide Conditions #9 and #11, and equipment limitations.

Pollutant	lb/hr	tpy
Scenario I: Natural Gas Combustion		
Sectiano 1.	Tratulal Gas CC	moustion
PM_{10}	0.6	2.3
SO_2	0.1	0.2
VOC	0.4	1.8
СО	5.8	25.4
NO_X	9.7	42.3
Scenario	II: Fuel Oil Com	bustion
PM_{10}	1.1	2.8
SO_2	22.6	59.2
VOC	0.2	0.4
СО	2.7	7.0
NO_X	10.6	27.8
Total Emissions		
PM_{10}	1.1	2.8

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Pollutant	lb/hr	tpy
SO_2	22.6	59.2
VOC	0.4	1.8
СО	5.8	25.4
NO_X	10.6	42.3

Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Plantwide Conditions #9, #11, and equipment limitations.

Pollutant	lb/hr	tpy
Scenario I: Natural Gas Combustion		
PM	0.6	2.3
Scenario II: Fuel Oil Combustion		
PM	1.1	2.8
Total Emissions		
PM	1.1	2.8

- Pursuant to §18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from SN-55 as measured by EPA Reference Method 9 when burning natural gas. Compliance with this condition will be demonstrated by Plantwide Condition #8.
- 63. Pursuant to §18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 20% opacity from SN-55 as measured by EPA Reference Method 9 when burning fuel oil. Compliance with this condition will be demonstrated by Plantwide Condition #7.
- 64. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR 60.43c(h), the permittee shall not exceed 0.30 weight percent sulfur content in the No. 2 fuel oil used to fire the boiler.

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Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the limits set in Specific Condition #64. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request.

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SN-59 Carbon Black Unloading/Distribution System

Source Description

Carbon Black is received in railcars and trucks and unloaded into an enclosed, mechanical conveyor system. From there, the carbon black is transferred to a storage silo. From the silo, enclosed, mechanical conveyors transfer the carbon black to the rubber mixers. The railcar and truck cannot be unloaded simultaneously.

Specific Conditions

66. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #69 and equipment limitations.

Pollutant	lb/hr	tpy
PM ₁₀	0.2	0.6

67. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #69 and equipment limitations.

Pollutant	lb/hr	tpy
PM	0.2	0.6

- 68. Pursuant to §18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 20% opacity from SN-59 as measured by EPA Reference Method 9. Compliance with this condition will be demonstrated by Plantwide Condition #8.
- 69. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not receive in excess of 100,000 tons of carbon black from SN-59 during any consecutive twelve month period.

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70. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #69. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7.

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SN-67 Tire Building Area

Source Description

All tire components are brought to the Tire Building Area (SN-67) where the tire builders assemble them. The components are assembled in a specific sequence on several different types of tire building machines. Passenger and light truck tires are assembled in two stages on different machines. At this point in the process, the tires are known as green tires. Solvents and cements are periodically used during tire building.

Specific Conditions

71. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Conditions #73, #75, #77, and equipment limitations.

Pollutant	lb/hr	tpy
VOC	15.1	35.0

Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Conditions #73, #75, #77, and equipment limitations.

Pollutant	lb/hr	tpy
Styrene	0.01	0.03

73. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not use in excess of 240 gallons of cement at SN-67 during any consecutive twelve month period.

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- 74. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #73. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7.
- 75. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not use in excess of 10,950 gallons of solvent in SN-67 during any consecutive twelve month period.
- 76. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #75. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7.
- 77. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not exceed the solvent VOC and HAP contents listed in the following table at SN-67.

Component	lbs per Gallon Solvent
VOC	6.25
Styrene	0.005

78. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records and MSDS sheets which demonstrate compliance with the limits set in Specific Condition #77. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request.

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SN-68 and SN-106 Tire Inspection/Repair Area Reclass Area

Source Description

All tires are inspected. Minor appearance repairs are made as required. Solvents and repair paints are used to make cosmetic repairs. Small hand held grinders are used on some tires to affect minor repairs in the tire appearance. The grinding process is included in Group B #17 of the Insignificant Activities List.

Specific Conditions

79. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Conditions #81, #83, #85, and equipment limitations.

Pollutant	lb/hr	tpy
VOC	17.2	40.9

80. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Conditions #81, #83, #85, and equipment limitations.

Pollutant	lb/hr	tpy
Methyl Ethyl Ketone	1.55	3.65
Styrene	0.01	0.01
Toluene	13.40	31.56

81. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not use in excess of 1,825 gallons of solvent from SN-68 and SN-106 combined during any consecutive twelve month period.

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- 82. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #81. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7.
- 83. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not use in excess of 10,950 gallons of paint in SN-68 and SN-106 combined during any consecutive twelve month period.
- 84. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #83. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7.
- 85. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not exceed the solvent and paint VOC and HAP contents listed in the following table at SN-68 and SN-106 combined.

Component	lbs per Gallon
VOC	6.25
Methyl Ethyl Ketone	0.67
Styrene	0.005
Toluene	5.77

86. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records and MSDS sheets which demonstrate compliance with the emission limits set in Specific Condition #85. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request.

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SN-72 Solvent Storage Tanks

Source Description

SN-72 consists of three solvent storage tanks for the various solvents used throughout the facility. Each tank has a capacity of 5,000 gallons.

Specific Conditions

87. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #88 and equipment limitations.

Pollutant	lb/hr	tpy
VOC	0.1	0.5

- 88. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not process in excess of 14,667 gallons of solvent in SN-72 during any consecutive twelve month period.
- 89. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #88. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7.

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SN-89 Boiler #4

Source Description

Boiler #4 (SN-89) is a 118.7 million BTU per hour natural gas fired boiler. The boiler can also be operated using No. 2 fuel oil, if the permittee desires. This boiler is permitted to operate under alternate operating scenarios. Scenario I represents natural gas combustion and Scenario II represents No. 2 fuel oil combustion. The boiler supplies steam to the facility for heat and operation of various equipment. This boiler is subject to New Source Performance Standards, Subpart Db-Industrial-Commercial-Institutional Steam Generating Units.

Specific Conditions

90. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #94, Plantwide Conditions #9 and #11, and equipment limitations.

Pollutant	lb/hr	tpy	
Scenario I:	Natural Gas Co	ombustion	
PM_{10}	1.2	5.0	
SO_2	0.2	0.6	
VOC	1.2	5.0	
СО	9.6	41.8	
NO_X	8.3	36.4	
Scenario	Scenario II: Fuel Oil Combustion		
PM_{10}	4.6	5.1	
SO_2	35.5	39.9	
VOC	0.6	0.7	
СО	18.9	21.2	

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Pollutant	lb/hr	tpy
NO_X	16.9	19.0
,	Total Emissions	
PM_{10}	4.6	5.1
SO_2	35.5	39.9
VOC	1.2	5.0
СО	18.9	41.8
NO_X	16.9	36.4

91. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Plantwide Conditions #9, #11, and equipment limitations.

Pollutant	lb/hr	tpy	
Scenario I: Natural Gas Combustion			
PM	1.2	5.0	
Scenario II: Fuel Oil Combustion			
PM 4.6 5.1			
Total Emissions			
PM	4.6	5.1	

92. Pursuant to §18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from SN-89 as measured by EPA Reference Method 9 when burning natural gas. Compliance with this condition will be demonstrated by Specific Condition #96.

- 93. Pursuant to §18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 20% opacity from SN-89 as measured by EPA Reference Method 9 when burning fuel oil. Compliance with this condition will be demonstrated by Specific Condition #96.
- 94. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR 60.43c(h), the permittee shall not exceed 0.30 weight percent sulfur content in the No. 2 fuel oil used to fire the boiler.
- 95. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the limits set in Specific Condition #94. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request.
- 96. Pursuant to 40 CFR 60, Subpart Db for Industrial-Commercial-Institutional Steam Generating Unit, the permittee shall be required to maintain continuous emissions monitoring systems (CEMS) for NO_X and opacity for SN-89. The permittee shall also comply with the Department's CEM standards (revised October 1996) located in Appendix C.

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SN-109 Rubber Extrusion

Source Description

Rubber Extrusion (SN-109) includes all extrusion operations plant-wide.

Emissions from Rubber Extrusion include various hazardous air pollutants. The HAP emission rates are based on AP-42 Draft Section 4.12 extrusion factors for compound 6. The significance of each HAP was determined by multiplying the calculated hourly emission rate by 4.38 (8760 hours per year divided by 2000 pounds per ton) and comparing that value with the relative toxicity. The significant emissions were then evaluated according to the Department's Non-Criteria Pollutant Strategy.

The VOC emissions from SN-109 are based on stack test data from Cooper's Findlay, Ohio tire manufacturing plant.

Specific Conditions

97. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #99 and equipment limitations.

Pollutant	lb/hr	tpy
VOC	2.6	11.1

98. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #99 and equipment limitations.

Pollutant	lb/hr	tpy
Acetophenone	0.20	0.87
Acrolein	0.02	0.08
1,3 Butadiene	0.03	0.13

Pollutant	lb/hr	tpy
Methylene Chloride	0.79	3.46
Toluene	0.56	2.43
Phenol	0.01	0.05
Styrene	0.04	0.19

- 99. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not process in excess of 262,800 tons of final mixed rubber from SN-109 during any consecutive twelve month period.
- 100. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #99. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7.

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SN-111 Tire Curing Operations

Source Description

This source includes curing presses for light truck and passenger car tires. In the tire curing operation, the tires are vulcanized (cured) in a mold for a specified time at a controlled temperature and pressure. Inside tire lubes are employed as mold lubes. According to the lube manufacturer, the material does not contain any VOCs or HAPs.

Emissions from Tire Curing include various hazardous air pollutants. The Rubber Manufacturers Association has determined emission factors for all of the emitted HAPs. The significance of each HAP was determined by multiplying the calculated hourly emission rate by 4.38 (8760 hours per year divided by 2000 pounds per ton) and comparing that value with the relative toxicity. The significant emissions were then evaluated according to the Department's Non-Criteria Pollutant Strategy.

Specific Conditions

101. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #99 and equipment limitations.

Pollutant	lb/hr	tpy
VOC	20.2	88.7

102. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #99 and equipment limitations.

Pollutant	lb/hr	tpy
Acrolein	0.03	0.10
Aniline	0.46	1.99
Carbon Disulfide	1.54	6.73

Pollutant	lb/hr	tpy
1,2 Dibromo-2 Chloropropane	0.03	0.11
Phenol	0.04	0.16
Toluene	1.55	6.79
M-Xylene and p- Xylene	3.10	13.60

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SN-121 Miscellaneous Plant-wide Use of Volatile Materials

Source Description

A number of miscellaneous materials are used in minor quantities at various points in the plant. This includes solvents, cements, inks, and paints.

Specific Conditions

103. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Conditions #16, #40, #48, #77, #85, and #105 and equipment limitations.

Pollutant	lb/hr	tpy
VOC	3.5	8.5

Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Conditions #16, #40, #48, #77, #85, and #105 and equipment limitations.

Pollutant	lb/hr	tpy
Ethyl Benzene	0.01	0.01
Glycol Ethers	0.31	0.74
Hexane	0.32	0.77
Methyl Ethyl Ketone	0.01	0.01
Toluene	0.01	0.02
Xylene	0.01	0.03

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105. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not use in excess of 2,760 gallons of miscellaneous solvents, cements, inks, and paints in SN-121 during any consecutive twelve month period. These materials are defined as solvents, cements, inks, and paints which are permitted at different sources in this facility, but are needed for non-routine use throughout the plant.

106. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the emission limit set in Specific Condition #105. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7.

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

The Cooper Tire Company, A Division of Cooper Tire & Rubber Company is in compliance with the applicable regulations cited in the permit application. The Cooper Tire Company, A Division of Cooper Tire & Rubber Company will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

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SECTION VI: PLANTWIDE CONDITIONS

- 1. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
- 2. Pursuant to §19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance if the work involved in the construction or modification is suspended for a total of 18 months or more.
- 3. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
- 4. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
 - a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
- 5. Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

- 6. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.
- 7. Pursuant to §19.503 of the Regulation #19 and 40 CFR Part 52, Subpart E, daily observations of the opacity of SN-53, and SN-55 shall be conducted, only when these sources are firing fuel oil, by personnel familiar with the permittee's visible emissions. The permittee shall maintain personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. If opacity is still greater than permit limits, a full Method 9 reading is required. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated weekly, kept on site, and made available to Department personnel upon request.
 - a. The date and time of the observation
 - b. If visible emissions which appeared to be above the permitted limit were detected
 - c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - d. The name of the person conducting the opacity observations.
- 8. Pursuant to §19.503 of the Regulation #19 and 40 CFR Part 52, Subpart E, weekly observations of the opacity of GR-01, GR-02, GR-03, GR-04, GR-05, GR-06, GR-07, SN-07, SN-53, SN-55, and SN-59 shall be conducted by personnel familiar with the permittee's visible emissions. This condition applies to SN-53 and SN-55 when these sources are firing natural gas. The permittee shall maintain personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. If opacity is still greater than permit limits, a full Method 9 reading is required. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated weekly, kept on site, and made available to Department personnel upon request.

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- a. The date and time of the observation
- b. If visible emissions which appeared to be above the permitted limit were detected
- c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
- d. The name of the person conducting the opacity observations.
- 9. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not use in excess of 1,996,404 MCF of natural gas in GR-07, SN-53, SN-55, and SN-89 combined during any consecutive twelve month period.
- 10. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Plantwide Condition #9. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7.
- 11. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not use in excess of 5,860,528 gallons of fuel oil in SN-53, SN-55, and SN-89 combined during any consecutive twelve month period.
- 12. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Plantwide Condition #11. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7.
- 13. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not use in excess of 1,103,760 gallons of propane from GR-07 combined during any consecutive twelve month period.
- 14. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the emission limit set in Plantwide Condition #13. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided

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to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7.

Title VI Provisions

- 15. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
 - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 16. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like appliance" as defined at §82.152.)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

- 17. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 18. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.
 - The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.
- 19. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

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SECTION VII: INSIGNIFICANT ACTIVITIES

Pursuant to §26.3(d) of Regulation 26, the following sources are insignificant activities. Insignificant and trivial activities will be allowable after approval and federal register notice publication of a final list as part of the operating air permit program. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §3(d) of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated November 24, 1999.

The following previously permitted sources have been determined to be insignificant.

Source	Description	Reason
SN-33 through SN-36	White Sidewall Protective Painters #1-4	Reg 19 Group B, #31.
SN-42	Dust Ring Lube Oil Tank	Reg 19 Group A, #3.
SN-56	Precure Treatment	Reg 19 Group B, #49.
SN-73	Process Oil Storage Tank	Reg 19 Group A, #3.
SN-74	Process Oil Storage Tank	Reg 19 Group A, #3.
SN-75	2-Latex Storage Tanks	Reg 19 Group A, #3.
SN-76	Process Oil Storage Tank	Reg 19 Group A, #3.
SN-90	Process Oil & Stearic Acid Storage Tanks	Reg 19 Group A, #3.
SN-91	Mobile Vacuum Unit	Reg 19 Group B, #14.
SN-92 and SN-93	Bladder Spray Booth #1 and Bladder Spray Booth #2	Reg 19 Group B, #31.
SN-94	Mold Lube	Reg 19 Group B, #31.
SN-95	Mold Cleaner	Reg 19.4 (c) (1).
SN-108	Rubber Milling	Reg 19 Group B, #72.
SN-110	Rubber Calendering	Reg 19 Group B, #72.
SN-112	Mold Cleaner	Reg 19.4 (c) (1).

Pursuant to §26.3(d) of Regulation 26, the following emission units, operations, or activities have been determined by the Department to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

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SECTION VIII: GENERAL PROVISIONS

- 1. Pursuant to 40 C.F.R. 70.6(b)(2), any terms or conditions included in this permit which 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 which 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. Pursuant to 40 C.F.R. 70.6(a)(2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.
- 3. Pursuant to §26.4 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.
- 4. Pursuant to 40 C.F.R. 70.6(a)(1)(ii) and §26.7 of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.
- 5. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(A) and §26.7 of Regulation #26, records of monitoring information required by this permit shall include the following:
 - a. The date, place as defined in this permit, and time of sampling or measurements:
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;

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- d. The analytical techniques or methods used;
- e. The results of such analyses; and
- f. The operating conditions existing at the time of sampling or measurement.
- 6. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(B) and §26.7 of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, 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 this permit.
- 7. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(A) and §26.7 of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

Arkansas Department of Environmental Quality Air Division ATTN: Compliance Inspector Supervisor Post Office Box 8913 Little Rock, AR 72219

- 8. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(B), §26.7 of Regulation #26, and §19.601 and 19.602 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department by the next business day after the occurrence. The initial report may be made by telephone and shall include:
 - a. The facility name and location,
 - b. The process unit or emission source which is deviating from the permit limit,
 - c. The permit limit, including the identification of pollutants, from which deviation occurs,
 - d. The date and time the deviation started,
 - e. The duration of the deviation,
 - f. The average emissions during the deviation,

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- g. The probable cause of such deviations,
- h. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
- i. The name of the person submitting the report.

A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include in addition to the information required by initial report a schedule of actions to be taken to eliminate future occurrences and/or to minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence and such report will serve as both the initial report and full report.

- 9. Pursuant to 40 C.F.R. 70.6(a)(5) and §26.7 of Regulation #26, and A.C.A.§8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.
- 10. Pursuant to 40 C.F.R. 70.6(a)(6)(i) and §26.7 of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- 11. Pursuant to 40 C.F.R. 70.6(a)(6)(ii) and §26.7 of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

- 12. Pursuant to 40 C.F.R. 70.6(a)(6)(iii) and §26.7 of Regulation #26, 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.
- 13. Pursuant to 40 C.F.R. 70.6(a)(6)(iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
- 14. Pursuant to 40 C.F.R. 70.6(a)(6)(v) and §26.7 of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director 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 Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.
- 15. Pursuant to 40 C.F.R. 70.6(a)(7) and §26.7 of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
- 16. Pursuant to 40 C.F.R. 70.6(a)(8) and §26.7 of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.
- 17. Pursuant to 40 C.F.R. 70.6(a)(9)(i) and §26.7 of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.
- 18. Pursuant to 40 C.F.R. 70.6(b) and §26.7 of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.

- 19. Pursuant to 40 C.F.R. 70.6(c)(1) and §26.7 of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
- 20. Pursuant to 40 C.F.R. 70.6(c)(2) and §26.7 of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
 - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.
- 21. Pursuant to 40 C.F.R. 70.6(c)(5) and §26.7 of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and 504(b) of the Act.
- 22. Pursuant to §26.7 of Regulation #26, nothing in this permit shall alter or affect the following:

- a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
- b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
- d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
- 23. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.









Request for PDS Invoice		
Invoice Number (assigned when invoice is printed)	PDS-	

AFIN r	46-0005			
Name (for confirmation only)	The Cooper Tire Company, A Division of Cooper Tire & Rubber Company			
Invoice Type (pick one) r	Initial	Mod X	Variance	
	Annual	Renewal	Interim Authority	
Permit Number r	0957-AOP-R3			
Media Code (A, S, U, W) r	A			
Fee Code or Pmt Type Coder	T5			
Fee Description (for confirmation only)	Minor Modification			
Amount Due r (whole dollar amount only)	\$500.00			
Printed Comment (600 characters maximum)				

Note: The information below is for use by the requesting division; it will not print on the invoice.		
Engineer	Amanda Holloway	
Paid? (yes/no)		
Check number		
Comments		

r **Required data**(See "g:\Misc\PDS_FeeCodes.wpd" for descriptions and discussions of fee codes)

Request submitted by:	Date:

Public Notice

Pursuant to the Arkansas Operating Air Permit Program (Regulation #26) Section 6(b), the Air Division of the Arkansas Department of Pollution Control and Ecology gives the following notice:

Cooper Tire & Rubber Company (Cooper) operates a tire manufacturing plant at 3500 East Washington Road, Texarkana, Arkansas 71854. This minor modification will increase the permitted emission rates of VOC from SN-109. The increase is attributed to the use of a new rubber compound, known as Compound 6a, which is used in producing silica-based tire tread components. This modification will result a permitted emission rate increase of 7.7 tpy of VOC.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Doug Szenher, Public Affairs Supervisor. Citizens desiring technical information concerning the application or permit should contact Amanda Holloway, Engineer. Both Doug Szenher and Amanda Holloway can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the *Texarkana Public Library*, 600 West Third, Texarkana, Texas, 75501. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal, or the proposed modification, to the Department at the above address - Attention: Doug Szenher. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8) and Regulation #26.

Dated this

Richard A. Weiss Interim Director