# ADEQ
# OPERATING
# AIR PERMIT

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

Permit No. : 957-AOP-R5
Renewal #1
IS ISSUED TO:
The Cooper Tire Company,
A Division of Cooper Tire & Rubber Company
3500 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:

February 1, 2006 AND January 31, 2011

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Mike Bates
Chief, Air Division

Date Modified

The Cooper Tire Company,
A Division of Cooper Tire & Rubber Company
Permit #: 957-AOP-R5
AFIN: 46-00005

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The Cooper Tire Company,
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Permit #: 957-AOP-R5
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List of Acronyms and Abbreviations

| | |
|---|---|
| A.C.A. | Arkansas Code Annotated |
| AFIN | ADEQ Facility Identification Number |
| CFR | Code of Federal Regulations |
| CO | Carbon Monoxide |
| HAP | Hazardous Air Pollutant |
| lb/hr | Pound Per Hour |
| MVAC | Motor Vehicle Air Conditioner |
| No. | Number |
| $NO_x$ | Nitrogen Oxide |
| PM | Particulate Matter |
| PM10 | Particulate Matter Smaller Than Ten Microns |
| SNAP | Significant New Alternatives Program (SNAP) |
| $SO_2$ | Sulfur Dioxide |
| SSM | Startup, Shutdown, and Malfunction Plan |
| Tpy | Tons Per Year |
| UTM | Universal Transverse Mercator |
| VOC | Volatile Organic Compound |

## SECTION I: FACILITY INFORMATION

| | |
|---|---|
| PERMITTEE: | The Cooper Tire Company,<br>A Division of Cooper Tire & Rubber Company |
| AFIN: | 46-00005 |
| PERMIT NUMBER: | 957-AOP-R5 |
| FACILITY ADDRESS: | 3500 Washington Road<br>Texarkana, AR 71854 |
| MAILING ADDRESS: | 3500 Washington Road<br>Texarkana, AR 71854 |
| COUNTY: | Miller |
| CONTACT POSITION: | Philip Trew, Plant Environmental Coor. |
| TELEPHONE NUMBER: | (870) 779-4260 |
| REVIEWING ENGINEER: | Amanda Leamons |
| UTM North South (Y): | Zone 15: 3698.14 |
| UTM East West (X): | Zone 15: 406.73 |

## SECTION II: INTRODUCTION

### Summary of Permit Activity

Cooper Tire & Rubber Company (Cooper) operates a tire manufacturing plant in Texarkana, Arkansas. This modification allows Cooper to replace 40 old curing presses contained in the Tire Curing Operation, SN-111, with 40 newer presses and to install 2 new extruders in the Rubber Extrusion Operations at SN-109. The curing press replacement and the new extruders will not result in an increase in permitted emissions. In addition to the requested modifications, the plantwide emission rates limited through Plantwide 15 were corrected to match the numbers provided in the application for Permit 957-AOP-R4. The HAP emission limits were mistakenly lowered and the emission limits have now been corrected to match the rates which the HAPs were previously permitted at and the rates requested through the R4 application.

### 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 8 rubber mixers (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).

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.

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 white sidewall protective 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.

## Regulations

The following table contains the regulations applicable to this permit.

| Regulations |
|---|
| Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999 |
| Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective December 19, 2004 |
| Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective September 26, 2002 |
| 40 CFR Part 60, *New Source Performance Standards* (NSPS), *Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units* |
| 40 CFR Part 60, NSPS, *Subpart BBB – Standards of Performance for the Rubber Tire Manufacturing Industry* |
| 40 CFR Part 63, *National Emissions Standards for Hazardous Air Pollutants* (NESHAP), *Subpart XXXX – Rubber Tire Manufacturing* |

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Permit #: 957-AOP-R5
AFIN: 46-00005

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

**Emission Summary**

| EMISSION SUMMARY | | | | |
|---|---|---|---|---|
| Source Number | Description | Pollutant | Emission Rates | |
| | | | lb/hr | tpy |
| Total Allowable Emissions | | PM | 21.0 | 92.0 |
| | | $PM_{10}$ | 21.0 | 92.0 |
| | | $SO_2$ | 69.4 | 128.7 |
| | | VOC | 278.1 | 249.0 |
| | | CO | 27.6 | 79.9 |
| | | $NO_X$ | 32.8 | 99.9 |
| | | Acetophenone* | 0.69 | 0.96 |
| | | Acrolein* | 0.05 | 0.20 |
| | | Aniline* | 0.67 | 2.49 |
| | | Benzyl Chloride* | 0.01 | 0.02 |
| | | 1,3 Butadiene* | 0.06 | 0.18 |
| | | Carbon Disulfide* | 1.81 | 7.84 |
| | | Carbonyl Sulfide * | 0.17 | 0.71 |
| | | 1,2 Dibromo-2 Chloropropane* | 0.03 | 0.11 |
| | | Vinylidene Chloride* | 0.04 | 0.16 |
| | | Diethylene Glycol-Mono Butyl Ether* | 0.41 | 1.5 |
| | | Ethylbenzene* | 1.34 | 5.71 |
| | | Glycol Ethers* | 0.27 | 1.17 |
| | | Hexane* | 0.64 | 2.74 |
| | | 4-Methyl-2-Pentanone (MIK)* | 3.18 | 13.89 |
| | | Methylene Chloride | 1.26 | 5.47 |
| | | Phenol* | 0.08 | 0.26 |
| | | Styrene* | 0.57 | 2.40 |
| | | Toluene* | 2.25 | 9.63 |
| | | Xylene* | 3.98 | 17.29 |
| GR-01 | Mixing (SN-01 through SN-06, SN-51, SN-123) Baghouse | PM<br>$PM_{10}$<br>VOC<br>HAPs | 1.2<br>1.2<br>125.4<br>*** | ***<br>***<br>***<br>*** |

| EMISSION SUMMARY | | | | |
|---|---|---|---|---|
| Source Number | Description | Pollutant | Emission Rates | |
| | | | lb/hr | tpy |
| GR-02 | Pellet Coolers (SN-40, SN-52, SN-61) Baghouse | PM<br>$PM_{10}$ | 1.2<br>1.2 | ***<br>*** |
| GR-03 | Tread End Cementers (SN-08, SN-09, SN-115) | PM<br>$PM_{10}$<br>VOC | 0.6<br>0.6<br>69.2 | ***<br>***<br>*** |
| GR-04 | Radial Green Tire Spray Booths (SN-14 through SN-19) | PM<br>$PM_{10}$<br>VOC | 6.3<br>6.3<br>18.5 | ***<br>***<br>*** |
| 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<br>$PM_{10}$<br>VOC | 2.2<br>2.2<br>0.8 | ***<br>***<br>*** |
| 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<br>$PM_{10}$<br>VOC<br>HAPs | 2.9<br>2.9<br>5.7<br>*** | ***<br>***<br>***<br>*** |
| GR-07 | Calender Dip System (SN-62 through SN-64) | Removed | | |
| GR-08 | Tread Markers (SN-65, SN-66, SN-116, SN-117) | VOC<br>HAPs | 2.4<br>*** | ***<br>*** |
| GR-09 | No. 2 Fuel Oil Tanks (SN-57, SN-58, SN-77) | Insignificant Activity | | |
| 07 | Centralized Compounding | PM<br>$PM_{10}$ | 0.1<br>0.1 | ***<br>*** |
| 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 | | |

| EMISSION SUMMARY | | | | |
|---|---|---|---|---|
| Source Number | Description | Pollutant | Emission Rates | |
| | | | lb/hr | tpy |
| 34 | White Sidewall Protective Painter #2 | Insignificant | | |
| 35 | White Sidewall Protective Painter #3 | Insignificant | | |
| 36 | White Sidewall Protective Painter #4 | Insignificant | | |
| 37 | WSW Buffer Protective Painter #5 | Insignificant | | |
| 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 | Insignificant | | |
| 49 | WSW Buffer Protective Painter #8 | Removed | | |
| 50 | WSW Buffer Protective Painter #9 | Removed | | |
| 53 | Boiler #1 | PM<br>$PM_{10}$<br>$SO_2$<br>VOC<br>CO<br>$NO_x$ | 0.6<br>0.6<br>11.3<br>0.2<br>2.9<br>5.3 | 1.4<br>1.4<br>29.6<br>0.9<br>12.7<br>21.2 |
| 54 | Boiler #2 | Removed | | |
| 55 | Boiler #3 | PM<br>$PM_{10}$<br>$SO_2$<br>VOC<br>CO<br>$NO_x$ | 1.1<br>1.1<br>22.6<br>0.4<br>5.8<br>10.6 | 2.8<br>2.8<br>59.2<br>1.8<br>25.4<br>42.3 |
| 56 | Precure Treatment | Insignificant | | |
| 59 | Carbon Black Unloading/ Distribution System | PM<br>$PM_{10}$ | 0.2<br>0.2 | ***<br>*** |
| 60 | Cement House | Removed | | |

| EMISSION SUMMARY | | | | |
|---|---|---|---|---|
| Source Number | Description | Pollutant | Emission Rates | |
| | | | lb/hr | tpy |
| 67 | Tire Building Area | VOC | 15.1 | *** |
| 68, 106 | Tire Inspection/Repair Area | VOC | 14.8 | *** |
| 72 | Solvent Storage Tanks | Removed | | |
| 73 | Process Oil Storage Tanks | Insignificant | | |
| 74 | Process Oil Storage Tanks | Insignificant | | |
| 75 | Latex Storage Tanks | Removed | | |
| 76 | Process Oil Storage Tanks | Insignificant | | |
| 81 | WSW Buffer Protective Painter #10 | Removed | | |
| 89 | Boiler #4 | PM<br>$PM_{10}$<br>$SO_2$<br>VOC<br>CO<br>$NO_x$ | 4.6<br>4.6<br>35.5<br>1.2<br>18.9<br>16.9 | 5.1<br>5.1<br>39.9<br>5.0<br>41.8<br>36.4 |
| 90 | Process Oil & Stearic Acid Storage Tanks | Insignificant | | |
| 91 | Mobile Vacuum Unit | Insignificant | | |
| 92 | Bladder Spray Booth #1 | Insignificant | | |
| 93 | Bladder Spray Booth #2 | Insignificant | | |
| 94 | Mold Lube | Insignificant | | |
| 95 | Mold Cleaner | Insignificant | | |
| 107 | Rubber Mixing | Emissions Routed to GR-01 | | |
| 108 | Rubber Milling | Insignificant | | |
| 109 | Rubber Extruding | VOC<br>HAPs | 2.6<br>*** | ***<br>*** |
| 110 | Rubber Calendering | Insignificant | | |
| 111 | Tire Curing | VOC<br>HAPs | 20.2<br>*** | ***<br>*** |

| EMISSION SUMMARY | | | | |
|---|---|---|---|---|
| Source Number | Description | Pollutant | Emission Rates | |
| | | | lb/hr | tpy |
| 112 | Mold Cleaner | Insignificant | | |
| 121 | Miscellaneous Plant-wide Use of Volatile Materials | VOC<br>HAPs | 1.7<br>*** | ***<br>*** |

*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.
**Air Contaminants such as ammonia, acetone, and certain halogenated solvents are not VOCs or HAPs.
***Plantwide limit for VOC of 249 tpy. Plantwide limit of $PM/PM_{10}$ of 92 tpy (21.0 lb/hr for 8760 hr/yr). HAPs are limited on a plantwide basis.

## 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 $SO_2$ 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.

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 $SO_2$, 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 $PM_{10}$ 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 $PM_{10}$, 135.1 tons per year VOC, 27.5 tons per year $SO_2$, 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.

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 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.

Permit **957-AOP-R3,** issued on September 10, 2003, was a minor modification that increased the permitted emission rates of VOC from SN-109. The increase was attributed to the use of a new rubber compound, known as Compound 6a, which was used in producing silica-based tire tread components. This modification resulted in an emissions increase of 7.7 tpy of VOC.

Permit **957-AOP-R4,** issued on February 1, 2006, included the Title V renewal, a permit modification to create a plantwide VOC emission limit of 249 tpy, a plantwide PM/$PM_{10}$ limit of 92 tpy based on hourly maximum emissions of 19.3 lb/hr, plantwide limits for HAPs, a modification to add Mixer #8 (SN-123) to GR-01, minor modifications to allow the installation of 16 additional curing presses to the Tire Curing Operation (SN-111), a minor modification to allow the addition of one uniformity optimizer (TUO, SN-122) to the Tire Uniformity Machines and Cleaning Area (GR-05), and minor modifications to allow the replacement of 25 curing ovens at SN-111.

The annual permitted emissions increased by 40.7 tons of PM/$PM_{10}$ and decreased by 227 tons of VOC due to the plantwide limits for VOC and PM. The annual permitted $NO_x$ emissions

decreased by 10 tons due to the removal of GR-07. Combined HAP emissions decreased more than 40 tons per year due to Cooper switching from HAP containing solvents and paints to HAP-free materials.

## SECTION IV: SPECIFIC CONDITIONS

GR-01
(SN-01 through SN-06, SN-51, SN-123)
Mixing

### Source Description

The Mixing Group includes No. 1 Mixer through No. 8 Mixer (SN-01 through SN-06 and SN-51, SN-123). 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 8 (SN-01 through SN-06, and SN-51, SN-123) are each equipped with fabric filter dust collectors. The emissions from Mixers 1 through 8 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. HAP emissions are permitted on a plantwide basis.

### Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through Plantwide Conditions 11 through 14 and equipment limitations. [Regulation 19, §19.501 et seq., effective December 19, 2004 and 40 CFR Part 52, Subpart E]

| Pollutant | lb/hr | tpy |
|---|---|---|
| $PM_{10}$ | 1.2 | * |
| VOC | 125.4 | * |

*Plantwide limits, see Plantwide Conditions 11 and 12.

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through Plantwide Conditions 12, 15, 16, 17 and equipment limitations. [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| Pollutant | lb/hr | tpy |
|---|---|---|
| PM | 1.2 | * |

| Pollutant | lb/hr | tpy |
|---|---|---|
| HAPs | * | * |

* Plantwide limit, see Plantwide Conditions 12 and 15.

3. 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. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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

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

4. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through Plantwide Condition 12 and equipment limitations. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| Pollutant | lb/hr | tpy |
|---|---|---|
| $PM_{10}$ | 1.2 | * |

*Plantwide limit, see Plantwide Condition 12.

5. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Plantwide Condition 12 and equipment limitations. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

| Pollutant | lb/hr | tpy |
|---|---|---|
| PM | 1.2 | * |

* Plantwide limit, see Plantwide Condition 12

6. 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. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-31

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

Source Description

This group includes #1 and #2 Tread End Cementers and #1CF Tread End Cementer (SN-08, SN-09, and SN-115). 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

7. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through Specific Conditions 10 and 12, Plantwide Conditions 11 through 14 and equipment limitations. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| Pollutant | lb/hr | tpy |
|---|---|---|
| $PM_{10}$ | 0.6 | * |
| VOC | 69.2 | * |

* Plantwide limit, see Plantwide Conditions 11 and 12.

8. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through Specific Conditions 10 and 12; Plantwide Condition 12 and equipment limitations. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

| Pollutant | lb/hr | tpy |
|---|---|---|
| PM | 0.6 | * |

* Plantwide limit, see Plantwide Condition 12.

9. 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. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

10. 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 40 CFR Part 60, Subpart BBB requires. [40 CFR 60 Subpart BBB]

11. The permittee shall maintain records which demonstrate compliance with Specific Condition 10 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. [§19.705, 40 CFR Part 52, Subpart E, and 40 CFR Part 60, Subpart BBB - Rubber Tire Manufacturing Industry]

12. The permittee shall not exceed the tread end cement VOC and HAP contents listed in the following table at GR-03. [§19.501 and 40 CFR Part 52 Subpart E]

| Component | Weight Percent |
|---|---|
| VOC | 100% |
| Any HAP | < 0.1% |

13. The permittee shall maintain records and MSDS sheets which demonstrate compliance with the limits set in Specific Condition 12. These records may be used by the Department for enforcement purposes. Records shall be kept up-to-date, shall be kept on site, and shall be provided to Department personnel upon request. [§19.705 and 40 CFR Part 52 Subpart E]

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

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

14. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions 17 and 19, Plantwide Conditions 11through 14, and equipment limitations. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| Pollutant | lb/hr | tpy |
|---|---|---|
| $PM_{10}$ | 6.3 | * |
| VOC | 18.5 | * |

* Plantwide limit, see Plantwide Conditions 11 and 12.

15. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions 17 and 19; Plantwide Condition 12; and equipment limitations. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| Pollutant | lb/hr | tpy |
|---|---|---|
| PM | 6.3 | * |

* Plantwide limit, see Plantwide Condition 12.

16. 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. [§18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

17. 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. [40 CFR Part 60, Subpart BBB]

18. The permittee shall maintain records which demonstrate compliance with Specific Condition 17 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. [§19.705, 40 CFR Part 52, Subpart E, and 40 CFR Part 60, Subpart BBB]

19. 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. [40 CFR Part 60, Subpart BBB]

20. The permittee shall maintain records which demonstrate compliance with Specific Condition 19 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. [§19.705, 40 CFR Part 52, Subpart E, and 40 CFR Part 60, Subpart BBB]

GR-05
(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, SN-122)
Tire Uniformity Machines & Cleaning Area

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, SN-120 and SN-122) and the Grind Cleaning Area (SN-105). All tires enter the TUOs, however only those that do not meet specifications are ground.

Specific Conditions

21. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Plantwide Conditions 11 through 14 and equipment limitations. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| Pollutant | lb/hr | tpy |
|---|---|---|
| $PM_{10}$ | 2.2 | * |
| VOC | 0.8 | * |

* Plantwide limit, see Plantwide Conditions 11 and 12.

22. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Plantwide Condition 12 and equipment limitations. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

| Pollutant | lb/hr | tpy |
|---|---|---|
| PM | 2.2 | * |

* Plantwide limit, see Plantwide Condition 12.

23. 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. [§18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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

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. HAP emissions are limited on a plantwide basis.

Specific Conditions

24. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Plantwide Conditions 11 through 14 and equipment limitations. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| Pollutant | lb/hr | tpy |
|---|---|---|
| $PM_{10}$ | 2.9 | * |
| VOC | 5.7 | * |

* Plantwide limit, see Plantwide Conditions 11 and 12.

25. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Plantwide Conditions 12, 15, 16 and equipment limitations. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

| Pollutant | lb/hr | Tpy |
|---|---|---|
| PM | 2.9 | * |
| HAPs | * | * |

* Plantwide limit, see Plantwide Conditions 12 and 15.

26. 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. [§18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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

Source Description

This group includes tread markers on the #1 and #2 Tread Lines and the #1CF Tread Line (SN-65, SN-66, and SN-116) 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

27. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Plantwide Conditions 11, 13, and 14; and equipment limitations. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| Pollutant | lb/hr | tpy |
|---|---|---|
| VOC | 2.4 | * |

* Plantwide limit, see Plantwide Condition 11.

28. The permittee shall not exceed the HAP emission rates set forth in Plantwide Condition 15. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

29. The permittee shall not exceed the ink and thinner VOC contents listed in the following table at GR-08. [§19.501 and 40 CFR Part 52 Subpart E]

| Solution | Component | Content (lb/gal) |
|---|---|---|
| Ink | VOC | 6.52 |
| Thinner | VOC | 9.11 |

30. The permittee shall maintain records and MSDS sheets which demonstrate compliance with the limits set in Specific Condition 29. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis and MSDS's shall be kept up-to-date. All records shall be kept on site, and shall be provided to Department personnel upon request. [§19.705 and 40 CFR Part 52 Subpart E]

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

31. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Plantwide Condition 12 and equipment limitations. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| Pollutant | lb/hr | tpy |
|---|---|---|
| $PM_{10}$ | 0.1 | * |

* Plantwide limit, see Plantwide Condition 12.

32. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Plantwide Condition 12 and equipment limitations. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

| Pollutant | lb/hr | Tpy |
|---|---|---|
| PM | 0.1 | * |

* Plantwide limit, see Plantwide Condition 12.

33. 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. [§18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-53
Boiler #1

Source Description

Boiler #1 (SN-53) is a 36 million BTU per hour natural gas fired boiler installed before 1969. 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 not subject to NSPS Subpart Dc because it has not undergone reconstruction or modification since the applicable date of the rule, June 9, 1989.

Specific Conditions

34. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition 38, Plantwide Condition 9, and equipment limitations. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| Pollutant | lb/hr | tpy |
|---|---|---|
| Scenario I: Natural Gas Combustion | | |
| $PM_{10}$ | 0.3 | 1.2 |
| $SO_2$ | 0.1 | 0.1 |
| VOC | 0.2 | 0.9 |
| CO | 2.9 | 12.7 |
| $NO_X$ | 4.8 | 21.2 |
| Scenario II: Fuel Oil Combustion | | |
| $PM_{10}$ | 0.6 | 1.4 |
| $SO_2$ | 11.3 | 29.6 |
| VOC | 0.1 | 0.2 |
| CO | 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 |
| CO | 2.9 | 12.7 |

| Pollutant | lb/hr | tpy |
|---|---|---|
| $NO_X$ | 5.3 | 21.2. |

35. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Plantwide Condition 9 and equipment limitations. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

| 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 |

36. 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 firing only pipeline quality natural gas. [§18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

37. 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. [§18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

38. The permittee shall not exceed 0.30 weight percent sulfur content in the No. 2 fuel oil used to fire the boiler. [§19.501 and 40 CFR 60.42c(d)]

39. The permittee shall maintain records which demonstrate compliance with the limits set in Specific Condition 38. These records may be used by the Department for enforcement purposes. Records shall be kept up-to-date, shall be kept on site, and shall be provided to Department personnel upon request. [§19.705 and 40 CFR Part 52 Subpart E]

SN-55
Boiler #3

Source Description

Boiler #3 (SN-55) is a 72 million BTU per hour natural gas fired boiler installed before 1969. 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 not subject to NSPS Subpart Dc because it has not undergone reconstruction or modification since the applicable date of the rule, June 9, 1989.

Specific Conditions

40. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition 44, Plantwide Condition 9, and equipment limitations. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| Pollutant | lb/hr | tpy |
|---|---|---|
| Scenario I: Natural Gas Combustion | | |
| $PM_{10}$ | 0.6 | 2.3 |
| $SO_2$ | 0.1 | 0.2 |
| VOC | 0.4 | 1.8 |
| CO | 5.8 | 25.4 |
| $NO_X$ | 9.7 | 42.3 |
| Scenario II: Fuel Oil Combustion | | |
| $PM_{10}$ | 1.1 | 2.8 |
| $SO_2$ | 22.6 | 59.2 |
| VOC | 0.2 | 0.4 |
| CO | 2.7 | 7.0 |
| $NO_X$ | 10.6 | 27.8 |
| Total Emissions | | |
| $PM_{10}$ | 1.1 | 2.8 |
| $SO_2$ | 22.6 | 59.2 |
| VOC | 0.4 | 1.8 |

| Pollutant | lb/hr | tpy |
|---|---|---|
| CO | 5.8 | 25.4 |
| $NO_X$ | 10.6 | 42.3 |

41. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Plantwide Condition 9 and equipment limitations. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

| 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 |

42. 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 firing only natural gas. [§18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

43. 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. [§18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

44. The permittee shall not exceed 0.30 weight percent sulfur content in the No. 2 fuel oil used to fire the boiler. [§19.501 and 40 CFR 60.42c(d)]

45. The permittee shall maintain records which demonstrate compliance with the limits set in Specific Condition 44. These records may be used by the Department for enforcement purposes. Records shall be kept up-to-date, shall be kept on site, and shall be provided to Department personnel upon request. [§19.705 and 40 CFR Part 52 Subpart E]

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

46. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Plantwide Condition 12 and equipment limitations. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| Pollutant | lb/hr | tpy |
|---|---|---|
| $PM_{10}$ | 0.2 | * |

* Plantwide limit, see Plantwide Condition 12.

47. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Plantwide Condition 12 and equipment limitations. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

| Pollutant | lb/hr | tpy |
|---|---|---|
| PM | 0.2 | * |

* Plantwide limit, see Plantwide Condition 12.

48. 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. [§18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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. HAP-free solvents and cements are periodically used during tire building.

Specific Conditions

49. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition 50; Plantwide Conditions 11, 13, and 0; and equipment limitations. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| Pollutant | lb/hr | tpy |
|---|---|---|
| VOC | 15.0 | * |

* Plantwide limit, see Plantwide Condition 11.

50. The permittee only use HAP free solvents and paints at SN-67. The VOC content shall not exceed the limits provided in the following table. [§19.501 and 40 CFR Part 52 Subpart E]

| Material | Component | Content (lb/gal) |
|---|---|---|
| Solvent | VOC | 6.114 |
| Cement | VOC | 6.28 |

51. The permittee shall maintain records and MSDS sheets which demonstrate compliance with the limits set in Specific Condition 50. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis and MSDS's shall be kept up-to-date. All records shall be kept on site, and shall be provided to Department personnel upon request. [§19.705 and 40 CFR Part 52 Subpart E]

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

Source Description

All tires are inspected. Minor appearance repairs are made as required. HAP-free 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

52. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition 53; Plantwide Conditions 11, 13, and equipment limitations. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| Pollutant | lb/hr | tpy |
|---|---|---|
| VOC | 14.8 | * |

* Plantwide limit, see Plantwide Condition 11.

53. The permittee only use HAP free solvents and paints at SN-68 and SN-106. The VOC content shall not exceed the limits provided in the following table. [§19.501 and 40 CFR Part 52 Subpart E]

| Material | Component | Content (lb/gal) |
|---|---|---|
| Solvent | VOC | 6.114 |
| Repair Paint | VOC | 0.055 |

54. The permittee shall maintain records and MSDS sheets which demonstrate compliance with the emission limits set in Specific Condition 53. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis and MSDS's shall be kept up-to-date. All records shall be kept on site, and shall be provided to Department personnel upon request. [§19.705 and 40 CFR Part 52 Subpart E]

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

55. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition 59, Plantwide Condition 9, and equipment limitations. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| Pollutant | lb/hr | tpy |
|---|---|---|
| Scenario I: Natural Gas Combustion | | |
| $PM_{10}$ | 1.2 | 5.0 |
| $SO_2$ | 0.2 | 0.6 |
| VOC | 1.2 | 5.0 |
| CO | 9.6 | 41.8 |
| $NO_X$ | 8.3 | 36.4 |
| Scenario II: Fuel Oil Combustion | | |
| $PM_{10}$ | 4.6 | 5.1 |
| $SO_2$ | 35.5 | 39.9 |
| VOC | 0.6 | 0.7 |
| CO | 18.9 | 21.2 |
| $NO_X$ | 16.9 | 19.0 |
| Total Emissions | | |
| $PM_{10}$ | 4.6 | 5.1 |
| $SO_2$ | 35.5 | 39.9 |
| VOC | 1.2 | 5.0 |
| CO | 18.9 | 41.8 |
| $NO_X$ | 16.9 | 36.4 |

56. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition 59, Plantwide Condition 9, and equipment limitations. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

| 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 |

57. 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 firing only natural gas. [§18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

58. 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 68. [§18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

59. The permittee shall not exceed 0.30 weight percent sulfur content in the No. 2 fuel oil used to fire the boiler. The permittee has based the emissions on using a fuel oil with a sulfur content of 0.3 weight percent which is a limit that is stricter than the 0.5 weight percent provided for in 40 CFR §60.42b(d). [§19.501 and 40 CFR §60.42b(d)]

60. The permittee shall maintain records which demonstrate compliance with the limits set in Specific Condition 59. These records may be used by the Department for enforcement purposes. Records shall be kept up-to-date, shall be kept on site, and shall be provided to Department personnel upon request. [§19.705 and 40 CFR Part 52 Subpart E]

61. The permittee shall not cause to be discharged into the atmosphere from that affected facility any gases that contain particulate matter in excess of the 0.1 lb/MMBtu when burning No.2 Fuel Oil. [§19.501, §19.304, and 40 CFR 60.43b(b)]

62. The permittee shall not cause to be discharged into the atmosphere from that affected facility any gases that contain nitrogen oxides (expressed as $NO_2$) in excess of 0.2 lb/MMBtu when burning natural gas or No.2 Fuel Oil. [§19.501, §19.304, and 40 CFR 60.44b(a)]

63. The permittee shall not simultaneously combust mixtures of oil and natural gas that shall cause to be discharged into the atmosphere from that affected facility any gases that contain nitrogen oxides in excess of a limit determined by the use of the following formula:
En=[(ELgo Hgo)+(ELro Hro)+(ELc Hc)]/(Hgo+Hro+Hc)

where:

En is the nitrogen oxides emission limit (expressed as $NO_2$), ng/J (lb/million Btu) ELgo is the appropriate emission limit from 40 CFR §60.44b(a)(1) for combustion of natural gas or distillate oil, ng/J (lb/million Btu) Hgo is the heat input from combustion of natural gas or distillate oil, ELro is the appropriate emission limit from 40 CFR §60.44b(a)(2) for combustion of residual oil, Hro is the heat input from combustion of residual oil, ELc is the appropriate emission limit from paragraph 40 CFR §60.44b(a)(3) for combustion of coal, and Hc is the heat input from combustion of coal. [§19.501, §19.304, and 40 CFR 60.44b(b)]

64. The particulate matter emission standards and opacity limits under 40 CFR §60.43b apply at all times except during periods of startup, shutdown, or malfunction. The nitrogen oxides emission standards under 40 CFR §60.44b apply at all times. [§19.304 and 40 CFR §60.46b(a)]

65. Compliance with the particulate matter emission standards under 40 CFR §60.43b shall be determined through performance testing as described below: [§19.304 and 40 CFR §60.46b(d)]

a. The permittee shall conduct an initial performance test as required under §60.8 using the following procedures and reference methods:
   i. Method 3B is used for gas analysis when applying Method 5 or Method 17.
   ii. Method 5, Method 5B, or Method 17 shall be used to measure the concentration of particulate matter as follows:
      1. Method 5 shall be used at affected facilities without wet flue gas desulfurization (FGD) systems; and
      2. Method 17 may be used at facilities with or without wet scrubber systems provided the stack gas temperature does not exceed a temperature of 160°C (320 °F). The procedures of sections 2.1 and 2.3 of Method 5B may be used in Method 17 only if it is used after a wet FGD system. Do not use Method 17 after wet FGD systems if the effluent is saturated or laden with water droplets.
      3. Method 5B is to be used only after wet FGD systems.
   iii. Method 1 is used to select the sampling site and the number of traverse sampling points. The sampling time for each run is at least 120 minutes and the minimum sampling volume is 1.7 dscm (60 dscf) except that smaller

sampling times or volumes may be approved by the Administrator when necessitated by process variables or other factors.

iv. For Method 5, the temperature of the sample gas in the probe and filter holder is monitored and is maintained at 160±14 °C (320±25 °F).

v. For determination of particulate matter emissions, the oxygen or carbon dioxide sample is obtained simultaneously with each run of Method 5, Method 5B or Method 17 by traversing the duct at the same sampling location.

vi. For each run using Method 5, Method 5B or Method 17, the emission rate expressed in nanograms per joule heat input is determined using:
   1. The oxygen or carbon dioxide measurements and particulate matter measurements obtained under this section,
   2. The dry basis F factor, and
   3. The dry basis emission rate calculation procedure contained in Method 19.

vii. Method 9 is used for determining the opacity of stack emissions.

66. Compliance with the nitrogen oxides emission standards under 40 CFR §60.44b shall be determined through performance testing under paragraph (e) of 40 CFR §60.46b (Specific Condition 67), as applicable. [§19.304 and 40 CFR §60.46b(c)]

67. To determine compliance with the emission limits for nitrogen oxides required under 40 CFR §60.44b, the permittee shall conduct the performance test as required under 40 CFR §60.8 using the continuous system for monitoring nitrogen oxides under 40 CFR §60.48(b). [§19.304 and 40 CFR §60.46b(e)]

a. For the initial compliance test, nitrogen oxides from the steam generating unit are monitored for 30 successive steam generating unit operating days and the 30-day average emission rate is used to determine compliance with the nitrogen oxides emission standards under 40 CFR §60.44b. The 30-day average emission rate is calculated as the average of all hourly emissions data recorded by the monitoring system during the 30-day test period.

b. Following the date on which the initial performance test is completed or required to be completed under 40 CFR §60.8, whichever date comes first, the owner or operator of an affected facility which has a heat input capacity of 73 MW (250 million Btu/hour) or less and which combusts natural gas, distillate oil, or residual oil having a nitrogen content of 0.30 weight percent or less shall upon request determine compliance with the nitrogen oxides standards under 40 CFR §60.44b through the use of a 30-day performance test. During periods when performance tests are not requested, nitrogen oxides emissions data collected pursuant to 40 CFR §60.48b(g)(1) or §60.48b(g)(2) are used to calculate a 30-day rolling average emission rate on a daily basis and used to prepare excess emission reports, but will not be used to determine compliance with the nitrogen oxides emission standards. A new 30-day rolling average emission rate is calculated each steam generating unit operating day as the average of all of the hourly nitrogen oxides emission data for the preceding 30 steam generating unit operating days.

68. 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 August 2004) located in Appendix C. [§19.703, 40 CFR §60.48b, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

## 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. HAP emissions are limited on a plantwide basis.

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

### Specific Conditions

69. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Plantwide Conditions 11, 13, and equipment limitations. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| Pollutant | lb/hr | tpy |
|---|---|---|
| VOC | 2.6 | * |

* Plantwide limit, see Plantwide Condition 11.

70. The permittee shall not exceed the HAP emission rates set forth in Plantwide Condition 15. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-111
Tire Curing Operations

Source Description

This source includes curing presses (total of 219 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. HAP emissions are limited on a plantwide basis.

This permitting action allowed the replacement of 40 older presses with 40 newer presses through a modification.

Specific Conditions

71. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Plantwide Conditions 11, 13, and equipment limitations. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| Pollutant | lb/hr | tpy |
|---|---|---|
| VOC | 20.2 | * |

* Plantwide limit, see Plantwide Condition 11.

72. The permittee shall not exceed the HAP emission rates set forth in Plantwide Condition 15. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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

73. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Plantwide Conditions 11, 13, and equipment limitations. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| Pollutant | lb/hr | tpy |
|---|---|---|
| VOC | 1.7 | * |

* Plantwide limit, see Plantwide Condition 11.

74. The permittee shall not exceed the HAP emission rates set forth in Plantwide Condition 15. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

## SECTION V: COMPLIANCE PLAN AND SCHEDULE

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.

## SECTION VI: PLANTWIDE CONDITIONS

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation 19, §19.410(B) and 40 CFR Part 52, Subpart E]

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

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

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

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

6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

7. 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. [§19.503 and 40 CFR Part 52, Subpart E]

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. Weekly observations of the opacity of GR-01, GR-02, GR-03, GR-04, GR-05, GR-06, SN-07, and SN-59 shall be conducted 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. [§19.503 and 40 CFR Part 52, Subpart E]

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. 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. [§19.501 and 40 CFR Part 52 Subpart E]

10. 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. A 12-month rolling total and each

month's individual data shall be submitted to the Department in accordance with General Provision 7. [§19.705 and 40 CFR Part 52 Subpart E]

11. The permittee shall not discharge or cause the discharge into the atmosphere from the facility any gases which contain VOC from emission sources in the amount equal to or in excess of 249 tons during any rolling 12-month period. The VOC emissions from GR-09, SN-53, SN-55, SN-72, and SN-89 are based on the process' maximum emissions, 8.6 tpy total for the listed sources. Therefore, those emissions will be assumed to be worst-case emissions for the calculation of the rolling 12-month total VOC emission calculation. [§19.501 and 40 CFR Part 52, Subpart E]

12. The permittee shall not discharge or cause the discharge into the atmosphere from the facility any gases which contain PM/$PM_{10}$ from emission sources in the amount in excess of 92 tons during any rolling 12-month period. Particulate emissions are based on maximum hourly equipment capacity and associated controls. Therefore, compliance with this condition shall be demonstrated through Plantwide Conditions 5, 7, 8, and 9. [§19.501 and 40 CFR Part 52, Subpart E]

13. The permittee shall maintain monthly records of mixed and imported rubber processed, boiler fuel usage, and usage of all tire production related materials containing VOCs (non-janitorial) to demonstrate compliance with Plantwide Condition 11. All calculations used to produce these records shall be updated on a monthly basis, shall be kept on site, and shall be provided to the Department upon request. These records shall be kept available for inspection or submittal for five years from the date of record. [§19.705 and 40 CFR Part 52 Subpart E]

14. The permittee shall perform emission calculations to determine the total monthly VOC emissions using the records required in Plantwide Condition 13. The permittee shall determine the rolling 12-month total VOC emissions for each calendar month to demonstrate compliance with Plantwide Condition 11. These records shall be kept on site, updated monthly, and made available to Department personnel upon request. If during any consecutive 12-month period the actual VOC emissions exceed 237.5 tons per year, the facility shall be required to demonstrate the accuracy of its record keeping system to show that emissions were less than 250 tons/year. The rolling 12-month total for each month shall be submitted to the Department in accordance with General Provision 7. [Regulation #19, §19.501 and 40 CFR Part 52, Subpart E]

15. The permittee shall not exceed the HAP emission rates set forth in the following table. Hourly HAP emissions are based on the facility's maximum hourly capacity for rubber mixing and tire production. The permittee shall demonstrate compliance with this condition by Plantwide Conditions 16 and 17. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

| Pollutant | lb/hr* | tpy |
|---|---|---|
| Acetophenone | 0.69 | 0.96 |
| Acrolein | 0.05 | 0.20 |
| Aniline | 0.67 | 2.49 |
| Benzyl Chloride | 0.01 | 0.02 |
| 1,3 Butadiene | 0.06 | 0.18 |
| Carbon Disulfide | 1.81 | 7.84 |
| Carbonyl Sulfide | 0.17 | 0.71 |
| 1,2 Dibromo-2 Chloropropane | 0.03 | 0.11 |
| Diethylene Glycol-Mono Butyl Ether | 0.41 | 1.5 |
| Ethyl Benzene | 1.34 | 5.71 |
| Glycol Ethers | 0.27 | 1.17 |
| 4-Methyl-2-Pentanone (MIK) | 3.18 | 13.89 |
| Methylene Chloride | 1.39 | 5.47 |
| Vinylidene Chloride | 0.04 | 0.16 |
| Hexane | 0.64 | 2.74 |
| Phenol | 0.08 | 0.26 |
| Styrene | 0.57 | 2.40 |
| Toluene | 2.25 | 9.63 |
| Xylene | 3.98 | 17.29 |

* Hourly emission limits are based on the facility mixing a maximum for 60,000 lb/hr of rubber and a throughput of 1,672,917 tires/month.

16. The permittee shall maintain monthly records of mixed and imported rubber processed, cements and solvents materials, and usage of all other production related materials containing HAPs (in quantities greater than de minimis levels) to demonstrate compliance with Plantwide Condition 15. All calculations used to produce these records shall be updated on a monthly basis, shall be kept on site, and shall be provided to the Department upon request. These records shall be kept available for inspection or submittal for five years from the date of record. [§19.705 and 40 CFR Part 52 Subpart E]

17. The permittee shall perform emission calculations to determine the total monthly HAP emissions using the records required in Plantwide Condition 16. The permittee shall determine the average hourly emissions (based on monthly records) and the rolling 12-month total HAP emissions for each calendar month to demonstrate compliance with Plantwide Condition 15. These records shall be kept on site, updated monthly, and made available to Department personnel upon request. The rolling 12-month total for each month shall be submitted to the Department in accordance the General Provision 7. [Regulation #19, §19.501 and 40 CFR Part 52, Subpart E]

18. The permittee shall maintain records and MSDS sheets for all cement and solvent materials as well as any other production related material on site containing HAPs. These records may be used by the Department for enforcement purposes. Records shall be kept up-to-date, shall be kept on site, and shall be provided to Department personnel upon request. [§19.705 and 40 CFR Part 52 Subpart E]

Title VI Provisions

19. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [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.

20. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]

    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.

21. 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.

22. 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.

23. The permittee can switch from any ozone depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G.

24. The permittee shall submit semi annual reports as required by General Provision 7 by July 31 and January 31 of each calendar year. Annual Compliance Certifications shall be submitted to the Department by January 31 of each calendar year. [Regulation 19, §19.705 and 40 CFR 52, Subpart E]

25. The facility is subject to and shall comply with applicable provisions of 40 CFR Part 63 Subpart XXXX - National Standards for Hazardous Air Pollutants from Rubber Tire Manufacturing. A copy of Subpart XXXX is provided in Appendix D. Applicable provisions include, but are not limited to, those specified in the following conditions.

26. 40 CFR Part 63, Subpart XXXX applies to each existing, new, or reconstructed affected source at facilities engaged in the manufacture of rubber tires or their components. The tire production affected source is the collection of all processes that use or process cements and solvents as defined in §63.6015, located at any rubber tire manufacturing facility. It includes, but is not limited to: Storage and mixing vessels and the transfer equipment containing cements and/or solvents; wastewater handling and treatment operations; tread and cement operations; tire painting operations; ink and finish operations; undertread cement operations; process equipment cleaning materials; bead cementing operations; tire building operations; green tire spray operations; extruding, to the extent cements and solvents are used; cement house operations; marking operations; calendar operations, to the extent solvents are used; tire striping operations; tire repair operations; slab dip operations; other tire building operations, to the extent that cements and solvents are used; and balance pad operations. [Regulation 19, §19.304 and 40 CFR §63.5982]

27. The permittee must meet each emission limit in either option 1 or option 2 of Table 1 to NESHAP Subpart XXXX that applies. Cooper Tire has chosen to comply with option 1, HAP constituent option. [Regulation 19, §19.304 and 40 CFR §63.5984]

28. The permittee must use one of the compliance alternatives in paragraphs (a) through (c) of this condition to meet either of the emission limits in option 1 of Table 1 of NESHAP Subpart XXXX.

    a. *Purchase alternative.* Use only cements and solvents that, as purchased, contain no more HAP than allowed by the emission limits in Table 1 to Subpart XXXX, option 1 (HAP constituent option).
    b. *Monthly average alternative, without using an add-on control device.* Use cements and solvents in such a way that the monthly average HAP emissions do not exceed the emission limits in Table 1 to Subpart XXXX, option 1 or option 2.
    c. *Monthly average alternative, using an add-on control device.* Use a control device to reduce HAP emissions so that the monthly average HAP emissions do not exceed the emission limits in Table 1 to Subpart XXXX, option 1 or option 2.

    Cooper Tire has chosen to comply with (b) monthly average alternative, without an add-on control device. [Regulation 19, §19.304 and 40 CFR §63.5985]

29. The permittee must determine the mass percent of HAP in cements and solvents. To determine the HAP content in the cements and solvents at the tire production affected source, use EPA Method 311 of Appendix A of 40 CFR Part 63, an approved alternative method, or any other reasonable means for determining the HAP content of the cements and solvents. Other reasonable means include, but are not limited to: a material safety data sheet (MSDS), provided it contains appropriate information; a certified product data sheet (CPDS); or a manufacturer's hazardous air pollutant data sheet. The permittee is not required to test the materials that are in use, but the Administrator may require a test using EPA Method 311 (or an approved alternative method) to confirm the reported HAP content. If the results of an analysis by EPA Method 311 are different from the HAP content determined by another means, the EPA Method 311 results will govern compliance determinations. [Regulation 19, §19.304 and 40 CFR §63.5994(a)]

30. The permittee must demonstrate compliance with the HAP constituent emission limits in Table 1 to Subpart XXXX (option 1). Use the equations in paragraphs (b)(2) and (3) of §63.5994 (Plantwide Condition 31) to demonstrate initial and continuous compliance with the emission limits for tire production affected sources using the monthly average compliance alternatives described in §63.5985(b) and (c), Plantwide Condition 28. [Regulation 19, §19.304 and 40 CFR §63.5994(b)]

31. The permittee shall use Equation 1 of §63.5994 (b)(2) to calculate the HAP emission rate for each monthly operating period when complying by using cements and solvents without using an add-on control device so that the monthly average HAP emissions do not exceed the HAP constituent emission limits in Table 1 to Subpart XXXX, option 1. Equation 1 follows [Regulation 19, §19.304 and 40 CFR §63.5994(b)(2)]:

$$E_{month} = \frac{\left(\sum_{i=1}^{n}(HAP_i)(TMASS_i)\right)(10^6)}{\sum_{i=1}^{n} TMASS_i} \qquad \text{(Eq. 1)}$$

Where:

$E_{month}$ = mass of the specific HAP emitted per total mass cements and solvents from all cements and solvents used in tire production per month, grams per megagram.

$HAP_i$ = mass percent, expressed as a decimal, of the specific HAP in cement and solvent i, as purchased, determined in accordance with paragraph (a) of this section.

$TMASS_i$ = total mass of cement and solvent i used in the month, grams.

n = number of cements and solvents used in the month.

32. The permittee shall demonstrate initial compliance with the emission limits for tire production affected sources through (a) and (b) below [Regulation 19, §19.304 and 40 CFR §63.5996]:
    a. The permittee must demonstrate initial compliance with each emission limit that applies according to Table 6 to Subpart XXXX.
    b. The permittee must submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in §63.6009(e).

33. The permittee shall monitor and collect data to demonstrate continuous compliance with the emission limits for tire production affected sources as specified in Table 9 to Subpart XXXX. Except for periods of monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), you must monitor continuously (or collect data at all required intervals) while the affected source is operating. This includes periods of startup, shutdown, and malfunction when the affected source is operating. [Regulation 19, §19.304 and 40 CFR §63.6003]

34. The permittee shall demonstrate continuous compliance with the emission limits for tire production affected sources using the methods specified in Table 10 to Subpart XXXX. The permittee must report each instance in which the facility did not meet an emission limit in Table 1 to Subpart XXXX. The permittee must also report each instance in which the permittee did not meet the applicable requirements in Table 10 to Subpart XXXX. These instances are deviations from the emission limits in Subpart XXXX. The deviations must be reported in accordance with the requirements in 40 CFR §63.6010(e). [Regulation 19, §19.304 and 40 CFR §63.6004]

35. The permittee must submit notifications as required in 40 CFR §63.6009. [Regulation 19, §19.304 and 40 CFR §63.6009]

36. The permittee must submit each applicable report in Table 15 to Subpart XXXX. The permittee must submit each report by the date in Table 15 to Subpart XXXX and according to the requirements in the following paragraphs (a) through (e) of this condition. [Regulation 19, §19.304 and 40 CFR §63.6010(a) and (b)]

    a. The first compliance report must cover the period beginning on the compliance date that is specified for the affected source in §63.5983 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for the source in §63.5983.
    b. The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in §63.5983.
    c. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
    d. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
    e. For each affected source that is subject to permitting subparts pursuant to 40 CFR Part 70 or 40 CFR Part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (a) through (d) of this condition.

37. The compliance report specificed in Plantwide Condition 36 must contain information specified in paragraphs (a) through (h) of this condition [Regulation 19, §19.304 and 40 CFR §63.6010(c)]:
    a. Company name and address.
    b. Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
    c. Date of report and beginning and ending dates of the reporting period.
    d. If the permittee had a startup, shutdown or malfunction during the reporting period and the actions taken consistent with the startup, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i).
    e. If there are no deviations from any emission limitations (emission limit or operating limit) that applies, a statement that there were no deviations from the emission limitations during the reporting period.
    f. If there were no periods during which the operating parameter monitoring systems were out-of-control as specified in §63.8(c)(7), a statement that there were no periods during which the operating parameter monitoring systems or CPMS were out-of-control during the reporting period.

g. For each tire production affected source, the emission limit option in §63.5984 and the compliance alternative in §63.5985 that the permittee has chosen to meet.
h. For each tire production affected source complying with the purchase compliance alternative in §63.5985(a), and for each annual reporting period during which you use a cement and solvent that, as purchased, was not included in the list submitted with the Notification of Compliance Status in §63.6009(g), an updated list of all cements and solvents used, as purchased, at the affected source. You must also include a statement certifying that each cement and solvent, as purchased, that was used at the affected source during the reporting period met the HAP constituent limits (option 1) in Table 1 to this subpart.

38. For each deviation from an emission limitation (emission limit or operating limit) that occurs at an affected source where the permittee is not using a CPMS to comply with the emission limitations in Subpart XXXX, the compliance report must contain the information in Plantwide Condition 37.a) thru (d) and the information in paragraphs (a) and (b) of this condition. This includes periods of startup, shutdown, and malfunction when the affected source is operating. [Regulation 19, §19.304 and 40 CFR §63.6010(d)]

a. The total operating time of each affected source during the reporting period.
b. Information on the number, duration, and cause of deviations (including unknown cause, if applicable) and the corrective action taken.

39. Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 or 40 CFR Part 71 must report all deviations as defined in Subpart XXXX in the semiannual monitoring report required by 40 CFR §70.6(a)(3)(iii)(A) or 40 CFR §71.6(a)(3)(iii)(A). If an affected source submits a compliance report (pursuant to Table 10 to Subpart XXXX) along with, or as part of, the semiannual monitoring report required by 40 CFR §70.6(a)(3)(iii)(A) or 40 CFR §71.6(a)(3)(iii)(A) which includes all required information concerning deviations from any emission limitation (including any operating limit) or work practice requirement in Subpart XXXX, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority. [Regulation 19, §19.304 and 40 CFR §63.6010(e)]

40. The permittee must keep the records specified in paragraphs (a) through (c) of this condition. [Regulation 19, §19.304 and 40 CFR §63.6011(a)]
a. A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirements in §63.10(b)(2)(xiv).
b. Records of performance tests as required in §63.10(b)(2)(viii).

c. The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.

41. For each tire production affected source, the permittee must keep the records specified in Table 9 to Subpart XXXX to show continuous compliance with each emission limit that applies to the affected facility. [Regulation 19, §19.304 and 40 CFR §63.6011(b)]

42. The permittee must keep records in a form suitable and readily available for expeditious review, according to §63.10(b)(1). As specified in §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee must keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). The permittee can keep the records offsite for the remaining 3 years. [Regulation 19, §19.304 and 40 CFR §63.6012]

43. The permittee must comply with the General Provisions of 40 CFR Part 63 as specified in Table 17 of 40 CFR Part 63, Subpart XXXX. [Regulation 19, §19.304 and 40 CFR §63.6013]

## SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated November 18, 2003.

| Source | Description | Group |
|---|---|---|
| SN-42 | Dust Ring Lube Oil Tank | A-3 |
| SN-73 | 2-Process Oil Storage Tank | A-3 |
| SN-74 | 5-Process Oil Storage Tank | A-3 |
| SN-76 | Process Oil Storage Tank | A-3 |
| SN-90 | Process Oil & Stearic Acid Storage Tanks | A-3 |
| SN-77 | 1,000 gallon No.2 Fuel Oil Tank | A-3 |
| SN-33 through SN-36 | White Sidewall Protective Painters #1-5 | A-9 |
| SN-92, SN-93 | Bladder Spray Booth #1 and Bladder Spray Booth #2 | A-9 |
| SN-94 | Mold Lube | A-9 |
| SN-57 | 30,000 gallon Fuel Oil Storage Tank | A-13 |
| SN-58 | 30,000 gallon Fuel Oil Storage Tank | A-13 |
| -- | Marking Ink @ GR-05 | A-13 |
| SN-91 | Mobile Vacuum Unit | B-14 |
| SN-108 | Rubber Milling | B-69 |
| SN-110 | Rubber Calendering | B-69 |

## SECTION VIII: GENERAL PROVISIONS

1. 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. [40 CFR 70.6(b)(2)]

2. 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. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000]

3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will 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. [Regulation 26, §26.406]

4. 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, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26, §26.701(A)(2)]

5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]

    a. The date, place as defined in this permit, and time of sampling or measurements;
    b. The date(s) analyses performed;
    c. The company or entity performing the analyses;
    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. The permittee must retain the records of all required monitoring data and support information for at least five (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. [40 CFR 70.6(a)(3)(ii)(B) and Regulation 26, §26.701(C)(2)(b)]

7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

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

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.

    a. For all upset conditions (as defined in Regulation19, § 19.601), the permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report my be made by telephone and shall include:

        i. The facility name and location
        ii. The process unit or emission source deviating from the permit limit,
        iii. The permit limit, including the identification of pollutants, from which deviation occurs,
        iv. The date and time the deviation started,
        v. The duration of the deviation,
        vi. The average emissions during the deviation,
        vii. The probable cause of such deviations,
        viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
        ix. The name of the person submitting the report.

    The permittee shall make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to

the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee 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 the report will serve as both the initial report and full report.

b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19, §19.601 and §19.602, Regulation 26, §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will 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. [40 CFR 70.6(a)(5), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

10. 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, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation 26, §26.701(F)(1)]

11. 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 to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation 26, §26.701(F)(2)]

12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation 26, §26.701(F)(3)]

13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation 26, §26.701(F)(4)]

14. The permittee must 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 must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation 26, §26.701(F)(5)]

15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26, §26.701(G)]

16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation 26, §26.701(H)]

17. If the permit allows 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 operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26, §26.701(I)(1)]

18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26, §26.702(A) and (B)]

19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26, §26.703(A)]

20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation 26, §26.703(B)]

    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 required 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 assuring compliance with this permit or applicable requirements.

21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation 26, §26.703(E)(3)]

    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;
    e. and Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.

22. Nothing in this permit will alter or affect the following: [Regulation 26, §26.704(C)]

    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. This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 a s referenced by A.C.A. §8-4-304 and §8-4-311]

# APPENDIX A
# NSPS Subpart Db

# APPENDIX B
# NSPS Subpart BBB

# APPENDIX C
# CEMS Conditions

# APPENDIX D
# NESHAP Subpart XXXX