

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0957-AOP-R8 AFIN: 46-00005

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

The Cooper Tire Company  
3500 East Washington Road  
Texarkana, Arkansas 71854

3. PERMIT WRITER:

Charles Hurt, P.E.

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Rubber Product Manufacturing for Mechanical Use  
NAICS Code: 326291

5. SUBMITTALS:

2/23/09, 5/4/2009

6. REVIEWER'S NOTES:

The Cooper Tire Company (AFIN: 46-00005) operates a tire manufacturing facility located at 3500 East Washington Road, Texarkana, AR 71854. Cooper submitted two minor modification applications. The following changes were requested:

Modification #1

Cooper requested permission to install the equipment listed below.

| Group Number | Source Number | Quantity | Description                   |
|--------------|---------------|----------|-------------------------------|
| 04           | 124           | 1        | Radial Green Tire Spray Booth |
| 05           | 125-127       | 3        | Tire Uniformity Optimizers    |
| 06           | 128, 129      | 2        | White Sidewall Buffers        |
| 08           | 130           | 1 set    | #2 Cold Feed Tread Markers    |

|   |        |    |   |
|---|--------|----|---|
| - | 68,106 | 3  | Tire Inspection / Repair Machines                             |
| - | 109    | 10 | Additional & Replacement Extrusion Lines in Rubber Extruding  |
| - | 111    | 29 | Additional & Replacement Curing Presses in Tire Curing        |
| - | 131    | 1  | New White Sidewall Protective Primer (Insignificant Activity) |

The total emission increase associated with this project is 26.9 tpy VOC, 0.8 tpy PM/PM<sub>10</sub>, and 0.005 tpy Lead (Pb). Cooper also requested a revision to the permitted PM/PM<sub>10</sub> emission limits to GR-03, GR-04, GR-05, and GR-06. The permit limits for those sources were based on an annual tire production rate of approximately 20 million tires whereas the facility as whole is limited to 17 million tires. Therefore, permitted PM/PM<sub>10</sub> emission limits were lowered by 3.6 tpy.

Modification #2

Cooper requested permission to install an additional truck radial green tire spray booth SN-132 at GR-04. The total emission increase associated with SN-132 is 3.5 tpy VOC and 1.2 tpy PM/PM<sub>10</sub>. Cooper requested the permit be modified for solvent change that affected Tire Building Area (SN-67), Tire Inspection/Repair and Reclass Area (SN-68 and SN-106), and Miscellaneous Plant-wide Use of Volatile Materials (SN-121). The maximum VOC content increased to 6.26 lb/gal to reflect the switch to the replacement solvent. VOC emissions associated with the solvent increased by 0.3 tpy.

The total emission increases associated the new equipment and VOC content changes from both modifications are 30.7 tpy VOC, 2.0 tpy PM/PM<sub>10</sub>, and 0.005 tpy Pb.

7. COMPLIANCE STATUS:

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

The facility was last inspected in October of 2008 and determined to be operating in accordance with Permit No. 0957-AOP-R7.

8. PSD APPLICABILITY:

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

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

If yes, explain why this permit modification not PSD?

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

| Source        | Pollutant                   | Regulation<br>(NSPS, NESHAP or PSD) |
|---------------|-----------------------------|-------------------------------------|
| GR-03 & GR-04 | All Listed                  | NSPS Subpart BBB                    |
| SN-89         | Opacity and SO <sub>2</sub> | NSPS Subpart Dc                     |

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. MODELING:

Criteria Pollutants

Examination of the source type, location, plot plan, land use, emission parameters, and other available information indicate that modeling is not warranted at this time for CO and VOC. For PM<sub>10</sub> there is an increase associated with the modification, but the increases are within the permitted limits. Below list the criteria pollutants which have been evaluated. The evaluation is based on modeling performed for a previous application.

| Pollutant        | Emission Rate<br>(lb/hr) | NAAQS<br>Standard<br>(µg/m <sup>3</sup> ) | Averaging Time   | Highest<br>Concentration<br>(µg/m <sup>3</sup> ) | % of<br>NAAQS |
|------------------|--------------------------|---|--|--|---------------|
| PM <sub>10</sub> | 21                       | 50  | Annual   | 37.3   | 74.6          |
|                  |                          | 150                                       | 24-Hour  | 144  | 96.0          |
| SO <sub>2</sub>  | 63.3                     | 80  | Annual   | 6.58   | 8.3           |
|                  |                          | 1300                                      | 3-Hour   | 172.3  | 13.3          |
|                  |                          | 365                                       | 24-Hour  | 67.55  | 18.5          |
| NO <sub>x</sub>  | 99.9                     | 100                                       | Annual   | 2.89   | 2.89          |
| Pb               | 0.00835                  | 0.15                                      | Rolling 3-month<br>Period over 3<br>years (not to be<br>exceeded in any<br>3 month period) | 0.147  | 98%           |

Note: For PM<sub>10</sub> the highest concentration reported includes Shreveport, LA 2008 PM<sub>10</sub> background concentrations. For Lead compliance with the NAAQS is demonstrated by comparing the highest concentration which is on a 24-hour basis (a short term averaging period) to the 3-month rolling total limit (a long term averaging period). In this case it is statistically impossible to exceed either limit.

Non-Criteria Pollutants:

1<sup>st</sup> Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m<sup>3</sup>), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

| Pollutant                   | TLV (mg/m <sup>3</sup> ) | PAER (lb/hr) =<br>0.11 × TLV | Proposed<br>lb/hr | Pass? |
|-----------------------------|--------------------------|------------------------------|-------------------|-------|
| 1,1,2,2-Tetrachloroethane   | 6.87                     | 0.7557                       | 0.02              | Yes   |
| 1,1-Dichloroethene          | 19.83                    | 2.1813                       | 0.04              | Yes   |
| 1,2-Dibromo-3-Chloropropane | 0.0097                   | 0.001067                     | 0.03              | No    |
| 1,3-Butadiene               | 4.4                      | 0.484                        | 0.05              | Yes   |
| 2,2,4-Trimethyl pentane     | 1401                     | 154.16                       | 0.16              | Yes   |
| 2-Butanone (MEK)            | 589                      | 64.79                        | 0.1               | Yes   |
| Acetophenone                | 49                       | 5.39                         | 0.27              | Yes   |
| Acrolein                    | 0.23                     | 0.0253                       | 0.06              | No    |
| Acrylonitrile               | 4.34                     | 0.4774                       | 0.01              | Yes   |
| Aniline                     | 7.6                      | 0.836                        | 0.72              | Yes   |
| Arsenic Compounds           | 0.01                     | 0.0011                       | 0.01              | No    |
| Benzene                     | 1.60                     | 0.176                        | 0.12              | Yes   |
| Benzyl Chloride             | 5.18                     | 0.5698                       | 0.01              | Yes   |
| Beryllium Compounds         | 0.002                    | 0.00022                      | 0.001             | No    |
| Bis(2-Ethylhexyl)phthalate  | 5                        | 0.55                         | 0.19              | Yes   |
| Cadmium Compounds           | 0.01                     | 0.0011                       | 0.04              | No    |
| Carbon Disulfide            | 31                       | 3.41                         | 1.96              | Yes   |
| Carbonyl Sulfide            | 4.2                      | 0.462                        | 0.21              | Yes   |
| Ethyl Acrylate              | 20.4                     | 2.244                        | 0.01              | Yes   |
| Ethylbenzene                | 434                      | 47.74                        | 1.37              | Yes   |
| Formaldehyde                | 1.5                      | 0.165                        | 0.07              | Yes   |
| Glycol Ethers               | 17                       | 1.87                         | 0.68              | Yes   |
| Hexachlorobutadiene         | 0.22                     | 0.0242                       | 0.03              | No    |
| Hexane                      | 176                      | 19.36                        | 1.09              | Yes   |
| Lead Compounds              | 0.05                     | 0.0055                       | 0.00835           | No    |
| Mercury Compounds           | 0.0011                   | 0.000121                     | 0.01              | No    |
| Methanol                    | 262                      | 28.82                        | 0.01              | Yes   |
| Methylene Chloride          | 174                      | 19.14                        | 1.49              | Yes   |
| MIBK (4-Methyl-2-Pentanone) | 417                      | 45.87                        | 4.05              | Yes   |
| Phenol                      | 19                       | 2.09                         | 0.11              | Yes   |
| Selenium Compounds          | 0.2                      | 0.022                        | 0.01              | Yes   |
| Styrene                     | 213                      | 23.43                        | 0.76              | Yes   |
| Tetrachloroethene           | 169.5                    | 18.645                       | 0.42              | Yes   |
| Toluene                     | 75.3                     | 8.283                        | 2.46              | Yes   |

| Pollutant                  | TLV (mg/m <sup>3</sup> ) | PAER (lb/hr) = 0.11 × TLV | Proposed lb/hr | Pass? |
|----------------------------|--------------------------|---------------------------|----------------|-------|
| Xylene (m, o, & p isomers) | 434                      | 47.74                     | 3.35           | Yes   |

2<sup>nd</sup> Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH. The evaluation is based on modeling performed for a previous application.

| Pollutant                  | (PAIL, µg/m <sup>3</sup> ) = 1/100 of TLV | Modeled lb/hr | Proposed lb/hr | Modeled Conc.(µg/m <sup>3</sup> ) | Pass? |
|----------------------------|---|---------------|----------------|-----------------------------------|-------|
| Acrolein                   | 2.3                                       | 0.19          | 0.05           | 1.58                              | YES   |
| 1,2 Dibromo-3Chloropropane | 0.097                                     | 0.03          | 0.025          | 0.094                             | YES   |
| Benzene                    | 5   | 0.06          | 0.06           | 0.53                              | YES   |
| Beryllium                  | 0.02                                      | 0.001         | 0.001          | 0.001                             | YES   |
| Hexachlorobutadiene        | 2.2                                       | 0.025         | 0.025          | 0.308                             | YES   |
| Lead Compounds             | 0.50                                      | 0.008         | 0.008          | 0.141                             | YES   |

Other Modeling:

Odor:

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

12. CALCULATIONS:

| SN    | Emission Factor Source | Emission Factor and units                             | Control Equipment Type | Control Equipment Efficiency | Comments                                     |
|-------|------------------------|---|------------------------|------------------------------|--|
| GR-01 | RMA                    | 4.00E-04 lb PM/lb rubber<br>3.86E-05 lb VOC/lb rubber | Baghouse               | 95%                          | RMA is the Rubber Manufacturers Association. |
| GR-02 | RMA                    | 4.00E-04 lb PM /lb rubber                             | Baghouse               | 95%                          |  |
|       | RMA                    | 4.00E-04 lb PM /lb rubber                             | Wet Scrubber           | 95%                          |  |
| GR-03 | MSDS<br>NSPS           | PM: 8% solids<br>10% overspray<br>VOC: 7.5 gr/tread   | None                   | None                         |  |
| GR-04 | Stack Test             | PM: 0.0015 lb/tire<br>VOC: 2 gr/tire                  | None                   | None                         |  |

| SN              | Emission Factor Source | Emission Factor and units   | Control Equipment Type | Control Equipment Efficiency | Comments |
|-----------------|------------------------|---|------------------------|------------------------------|----------|
| GR-05           | RMA                    | PM: 0.05 lb/tire<br>VOC: 1.59E-2 lb/lb rubber   | Baghouse               | 95.8%                        |          |
| GR-06           | RMA                    | PM: 0.10 lb/tire<br>VOC: 1.59E-2 lb/lb rubber   | Baghouse               | 99.2%                        |          |
| GR-08           | MSDS                   | VOC: 6.52 lb/gal ink<br>9.11 lb/gal thinner   | None                   | None                         |          |
| SN-07           | AP-42<br>11.24-2       | PM: 0.12 lb/ton   | Baghouse               | 95%                          |          |
| SN-53           | AP-42                  | Standard Natural Gas<br>Standard Fuel Oil   | None                   | None                         |          |
| SN-55           | AP-42                  | Standard Natural Gas<br>Standard Fuel Oil   | None                   | None                         |          |
| SN-67           | MSDS                   | VOC:<br>6.26 lb/gal (solvent)<br>6.28 lb/gal (cement)   | None                   | None                         |          |
| SN-68<br>SN-106 | MSDS                   | VOC:<br>6.26 lb/gal (solvent)<br>0.055 lb/gal (paint)   | None                   | None                         |          |
| SN-89           | AP-42<br>& Testing     | Standard Natural Gas<br>Standard Fuel Oil<br>99.7 MMBTU/hr<br>8760 hrs/yr (NG)<br>6304 hrs/yr (FO)<br>95.4 MCF/hr (NG)<br>Nat. Gas Factors<br>10 lb PM/MMCF<br>1.2 lb SO <sub>2</sub> /MMCF<br>10 lb VOC/MMCF<br>84 lb CO/MMCF<br>73.2 lb NO <sub>x</sub> /MMCF<br>Fuel Oil Factors:<br>6 lb PM/kgal<br>142(.03) lb SO <sub>2</sub> /kgal<br>0.75 lb VOC/kgal<br>25 lb CO/kgal<br>22.4 lb NO <sub>x</sub> /kgal | None                   | None                         |          |
| SN-108          | RMA                    | 30 ton/hr throughput<br>70% of rubber, milled<br>50% compd #6a mixed<br>1.1E-4 lbcompd#2/lbrubber<br>0.00371<br>lbcompd#6a/lbrubber   | None                   | None                         |          |
| SN-109          | RMA                    | VOC: 4.2E-5 lb/lb rubber  | None                   | None                         |          |
| SN-110          | RMA                    | 30 ton/hr thurput<br>40% of rubber, calendered<br>5.59E-5 lbcompd#2/lbrubber  | None                   | None                         |          |
| SN-111          | RMA                    | VOC: 3.37E-4 lb/lb rubber   | None                   | None                         |          |
| SN-121          | MSDS                   | Various   | None                   | None                         |          |

13. TESTING REQUIREMENTS:

The permit does not require stack testing.

## 14. MONITORING OR CEMS

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

| SN    | Parameter or Pollutant to be Monitored | Method (CEM, Pressure Gauge, etc.) | Frequency    | Report (Y/N) |
|-------|--|------------------------------------|--------------|--------------|
| GR-02 | Pressure Drop                          | Pressure Gauge and Sensors         | continuously | N            |

## 15. RECORDKEEPING REQUIREMENTS:

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

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

| Source | Recorded Item                     | Limit (as established in permit)                              | Frequency        | Report (Y/N) |
|--------|-----------------------------------|---|------------------|--------------|
| SN-106 | Solvent & Paint VOC Content       | Listed in Table   | Annually         | N            |
| SN-89  | Fuel Oil Throughput               | 1,695,103 gallons/yr  | Monthly, as used | Y            |
|        | Sulfur Content                    | 0.3 Weight %  | As Needed        | N            |
| SN-121 | All HAP containing material usage | 1.17 tpy Glycol ethers<br>0.06 tpy Toluene<br>0.09 tpy Xylene | Monthly          | Y            |
| Plant  | All VOC containing material usage | 249 tpy VOC   | Monthly          | Y            |
|        | MSDS (VOC & HAP Contents)         | ----  | As needed        | N            |

16. OPACITY:

| SN                  | Opacity % | Justification (NSPS limit, Dept. Guidance, etc) | Compliance Mechanism  |
|---------------------|-----------|---|---|
| GR-01 through GR-06 | 20        | Dept Guidance                                   | EPA Method 9  |
| GR-02 (SN-61 only)  | 5         | Dept Guidance – Wet Scrubber Control            | CPMS  |
| 07                  | 20        | Dept Guidance                                   | EPA Method 9  |
| 53                  | 5         | Dept Guidance-NG                                | EPA Method 9<br>Burn only Nat. Gas  |
| 53                  | 20        | Dept Guidance Fuel Oil                          | E[Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and CFR Part 52, Subpart E]PA Method 9 |
| 55                  | 5         | Dept Guidance –NG                               | EPA Method 9<br>Burn only Nat. Gas  |
| 55                  | 20        | Dept Guidance Fuel Oil                          | EPA Method 9  |
| 89                  | 5         | Dept Guidance - NG                              | EPA Method 9  |
| 89                  | 20        | NSPS Dc – Fuel Oil                              | Continuous - CEMS   |

17. DELETED CONDITIONS:

| Former SC | Justification for removal     |
|-----------|-------------------------------|
| PC 37     | Boiler MACT has been vacated. |



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18. GROUP A INSIGNIFICANT ACTIVITIES

| Source Name                       | Group A Category | Emissions (tpy) |        |       |
|-----------------------------------|------------------|-----------------|--------|-------|
|                                   |                  | VOC             | HAPs   |       |
|                                   |                  |                 | Single | Total |
| White Sidewall Protective Painter | A-9              | 0.1758          | 0.038  | 0.043 |

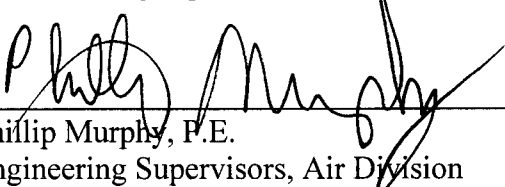
19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

| Permit #    |
|-------------|
| 0957-AOP-R7 |

20. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.

  
\_\_\_\_\_  
Phillip Murphy, P.E.  
Engineering Supervisors, Air Division



APPENDIX A – EMISSION CHANGES AND FEE CALCULATION



## Fee Calculation for Major Source

Revised 06-17-09

Facility Name: The Cooper Tire Company  
 Permit Number: 0957-AOP-R8  
 AFIN: 46-00005

|               |           |                                   |        |
|---------------|-----------|-----------------------------------|--------|
| \$/ton factor | 22.07     | Annual Chargeable Emissions (tpy) | 539.52 |
| Permit Type   | Minor Mod | Permit Fee \$                     | 500    |

|   |                          |
|---|--------------------------|
| Minor Modification Fee \$                                       | 500                      |
| Minimum Modification Fee \$                                     | 1000                     |
| Renewal with Minor Modification \$                              | 500                      |
| Check if Facility Holds an Active Minor Source Permit           | <input type="checkbox"/> |
| If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$ | 0                        |
| Total Permit Fee Chargeable Emissions (tpy)                     | -4.96                    |
| Initial Title V Permit Fee Chargeable Emissions (tpy)           |                          |

*HAPs not included in VOC or PM: Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride*

*Air Contaminants: All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensible PM, H2S in TRS, etc.)*

| Pollutant (tpy)             | Check if Chargeable Emission        | Old Permit | New Permit | Change in Emissions | Permit Fee Chargeable Emissions | Annual Chargeable Emissions |
|-----------------------------|-------------------------------------|------------|------------|---------------------|---------------------------------|-----------------------------|
| PM                          | <input checked="" type="checkbox"/> | 53.7       | 49.7       | -4                  | -4                              | 49.7                        |
| PM <sub>10</sub>            | <input type="checkbox"/>            | 53.7       | 49.7       | -4                  |                                 |                             |
| SO <sub>2</sub>             | <input checked="" type="checkbox"/> | 125.5      | 125.5      | 0                   | 0                               | 125.5                       |
| VOC                         | <input checked="" type="checkbox"/> | 249        | 249        | 0                   | 0                               | 249                         |
| CO                          | <input type="checkbox"/>            | 84.6       | 84.6       | 0                   |                                 |                             |
| NO <sub>x</sub>             | <input checked="" type="checkbox"/> | 108.2      | 108.2      | 0                   | 0                               | 108.2                       |
| 1,1,2,2-Tetrachloroethane   | <input type="checkbox"/>            | 0.06       | 0.05       | -0.01               |                                 |                             |
| 1,1-Dichloroethene          | <input type="checkbox"/>            | 0.16       | 0.13       | -0.03               |                                 |                             |
| 1,2-Dibromo-3-Chloropropane | <input type="checkbox"/>            | 0.11       | 0.1        | -0.01               |                                 |                             |
| 1,3-Butadiene               | <input type="checkbox"/>            | 0.16       | 0.18       | 0.02                |                                 |                             |
| 2,2,4- Trimethyl pentane    | <input type="checkbox"/>            | 0.47       | 0.47       | 0                   |                                 |                             |
| Acetophenone                | <input type="checkbox"/>            | 1          | 0.89       | -0.11               |                                 |                             |
| Acrolein                    | <input type="checkbox"/>            | 0.2        | 0.17       | -0.03               |                                 |                             |
| Acrylonitrile               | <input type="checkbox"/>            | 0.03       | 0.03       | 0                   |                                 |                             |
| Aniline                     | <input type="checkbox"/>            | 2.61       | 2.3        | -0.31               |                                 |                             |
| Arsenic Compounds           | <input type="checkbox"/>            | 0.01       | 0.01       | 0                   |                                 |                             |
| Benzene                     | <input type="checkbox"/>            | 0.26       | 0.26       | 0                   |                                 |                             |
| Benzyl Chloride             | <input type="checkbox"/>            | 0.02       | 0.02       | 0                   |                                 |                             |
| Beryllium Compounds         | <input type="checkbox"/>            | 0.001      | 0.001      | 0                   |                                 |                             |

| Pollutant (tpy)                    | Check if Chargeable Emission        | Old Permit | New Permit | Change in Emissions | Permit Fee Chargeable Emissions | Annual Chargeable Emissions |
|------------------------------------|-------------------------------------|------------|------------|---------------------|---------------------------------|-----------------------------|
| Bis(2-Ethylhexyl)phthalate         | <input type="checkbox"/>            | 0.62       | 0.59       | -0.03               |                                 |                             |
| Cadmium Compounds                  | <input type="checkbox"/>            | 0.01       | 0.04       | 0.03                |                                 |                             |
| Carbon Disulfide (included in VOC) | <input type="checkbox"/>            | 8.46       | 7.37       | -1.09               |                                 |                             |
| Carbonyl Sulfide (included in VOC) | <input type="checkbox"/>            | 0.86       | 0.82       | -0.04               |                                 |                             |
| Ethyl Acrylate                     | <input type="checkbox"/>            |            | 0.03       | 0.03                |                                 |                             |
| Ethylbenzene                       | <input type="checkbox"/>            | 5.74       | 5.77       | 0.03                |                                 |                             |
| Formaldehyde                       | <input type="checkbox"/>            | 0.14       | 0.14       | 0                   |                                 |                             |
| Glycol Ethers                      | <input type="checkbox"/>            | 2.67       | 2.27       | -0.4                |                                 |                             |
| Hexachlorobutadiene                | <input type="checkbox"/>            | 0.11       | 0.1        | -0.01               |                                 |                             |
| Hexane                             | <input type="checkbox"/>            | 4.53       | 4.19       | -0.34               |                                 |                             |
| Lead Compounds                     | <input type="checkbox"/>            | 0.02       | 0.01729    | -0.00271            |                                 |                             |
| Mercury Compounds                  | <input type="checkbox"/>            | 0.01       | 0.01       | 0                   |                                 |                             |
| Methanol                           | <input type="checkbox"/>            |            | 0.01       | 0.01                |                                 |                             |
| Methylene Chloride                 | <input checked="" type="checkbox"/> | 6.35       | 5.48       | -0.87               | -0.87                           | 5.48                        |
| MIBK (4-Methyl-2-Pentanone)        | <input type="checkbox"/>            | 16.88      | 16.57      | -0.31               |                                 |                             |
| Phenol                             | <input type="checkbox"/>            | 0.26       | 0.28       | 0.02                |                                 |                             |
| Selenium Compounds                 | <input type="checkbox"/>            | 0.01       | 0.01       | 0                   |                                 |                             |
| Styrene                            | <input type="checkbox"/>            | 2.83       | 2.68       | -0.15               |                                 |                             |
| Tetrachloroethene                  | <input checked="" type="checkbox"/> | 1.73       | 1.64       | -0.09               | -0.09                           | 1.64                        |
| Toluene                            | <input type="checkbox"/>            | 10.5       | 9.01       | -1.49               |                                 |                             |
| Xylene (m, o, & p isomers)         | <input type="checkbox"/>            | 17.52      | 12.28      | -5.24               |                                 |                             |

**PDS DATA ENTRY FORM  
AIR PERMITS**

**Date Issued (yy/mm/dd):** 10/1/2009  
**AFIN:** 46-00005  
**Facility Name:** Cooper Tire Co.  
**City:** Texarkana  
**Permit #:** 0957-AOP-R8  
**Media Code:** A  
**Permit Type (MS, T5, R3):** T5 *mm*  
**T5 Permit Expiration Date:** 1/31/2011

**Volume (TPY):** 539.52

**Engineer:** Charles Hurt

**PDS Invoice Number Entered if Applicable** Yes \_\_\_\_\_ No X

**Invoice #** \_\_\_\_\_

**Previous Permit # Voided** 0957-AOP-R7

Tom *TH* Cynthia *CSA* *10/14/09*







**COOPERTIRES**

COOPER TIRE COMPANY

3500 East Washington Road • Texarkana, AR 71854 • 870.773.4502

September 25, 2009

Mr. Charles Hurt  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, Arkansas 72118-5317

Subject: Comments on Cooper Tire Draft Operating Air Permit #957-AOP-R8

Dear Mr. Hurt:

As you know, the Cooper Tire Company (Cooper) operates a tire manufacturing facility in Texarkana, Arkansas under Title V operating permit #957-AOP-R7. The ADEQ issued a draft permit #957-AOP-R8 for public comment on July 21, 2009. Public notice was printed in the Texarkana Gazette on August 25, 2009. Cooper has reviewed the draft permit and offers the comments provided below.

1. The Emission Summary Table, page 13, SN-67 indicates VOC to be 0.1 lb/hr. The VOC should be changed to 3.8 lb/hr to be consistent with the source table on page 42.
2. Specific Condition 2, page 23, the emission table indicates a "\*" footnote reference to Tetrachloroethene and Toluene. There is no footnote to the table. Please clarify the footnote or remove the "\*" reference.
3. Specific Conditions 9-11, page 24, requires opacity to be demonstrated by maintaining pressure drop and performing a monthly inspection on the sensors. The wet scrubber is equipped to maintain proper operating range and set up in the facility preventative maintenance system for routine inspection. Cooper request to change SC-9 to be consistent with other opacity monitoring requirements (SC-3, 8, 14, 21, 28, 31, 40, and 59) to reduce complexity and reduce record keeping associated with the wet scrubber. In addition Cooper request to remove specific conditions 10 and 11 and other conditions be numbered sequentially as needed.
4. Source Description for GR-04, page 28, paragraph 1, line 1, should include the newly added equipment. "This group includes Radial Green Tire Spray Booths #1 through #9 (SN-14 through SN-19, SN-122, SN-124, and SN-132 respectively.)"
5. Source Description for GR-05, page 30, paragraph 1, line 1, should include the newly added equipment. "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 through SN-120, and SN-125 through SN-127) and the Grind Cleaning Area (SN-105)."
6. Source Description for GR-06, page 32, paragraph 1, line 1, should include the newly added equipment. "This group includes White Sidewall Buffers #2 through #21 (SN-29

through SN-32, SN-47 through SN-48, SN-69 through SN-71, SN-80, SN-96 through SN-104, and SN-128 through SN-129)....”

7. Source Description for GR-08, page 34, paragraph 1, line 1, should include the newly added equipment. “This group includes tread markers (SN-65, SN-66, SN-116, and SN-130).”
8. Specific Condition 34, page 34, should change the word “solvent” to “thinner” to be consistent with other conditions in the group.
9. Source Description for SN-68 and SN-106, page 44, paragraph 1, line 1, indicates HAP-free solvent and repair paints are used to make cosmetic repairs. As indicated in the permit application, repair paints with minimal amounts of HAPs should be allowed.
10. Specific Condition 68 indicates compliance shall be demonstrated by Specific Condition #60, should be changed to read “demonstrated by Specific Conditons #69 and #71.”

Cooper appreciates this opportunity to submit comments on the Draft Title V operating permit 957-AOP-R8. If you need any additional information, please contact me at 870-779-4260 or Tom Wood at our Corporate Office at 419-424-4345.

Respectfully,

THE COOPER TIRE COMPANY



Charles Allen  
Plant Environmental Coordinator

cc: Tom Wood