

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb Governor Brian C. Rockensuess Commissioner

To:	Interested Parties
Date:	June 25, 2024
From:	Jenny Acker, Chief Permits Branch Office of Air Quality
Source Name:	The Goodyear Tire & Rubber Company
Permit Level:	Registration AA
Permit Number:	051-47201-00047
Source Location:	12624 S Northgate Dr, Haubstadt, IN 47639
Type of Action Taken:	Changes that are administrative in nature

# Notice of Decision: Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

The final decision is available on the IDEM website at: <u>http://www.in.gov/apps/idem/caats/</u> To view the document, choose Search Option **by Permit Number**, then enter permit 47201. This search will also provide the application received date and **final** permit issuance date.

The final decision is also available via IDEM's Virtual File Cabinet (VFC). Please go to: <a href="https://www.in.gov/idem">https://www.in.gov/idem</a> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

(continues on next page)



If you would like to request a paper copy of the permit document, please contact IDEM's Office of Records Management:

IDEM - Office of Records Management Indiana Government Center North, Room 1207 100 North Senate Avenue Indianapolis, IN 46204 Phone: (317) 232-8667 Fax: (317) 233-6647 Email: IDEMFILEROOM@idem.in.gov

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room N103, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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Eric J. Holcomb Governor Brian C. Rockensuess Commissioner

June 25, 2024

Mr. Mike Phelps The Goodyear Tire & Rubber Company 12624 S Northgate Dr Haubstadt, IN 47639

> Re: 051-47201-00047 Administrative Amendment to Registration No. R051-21538-00047

Dear Mr. Phelps:

The Goodyear Tire & Rubber Company was issued a Registration No. R051-21538-00047 on September 16, 2005, for a stationary truck tire retreading operation located at 12624 S Northgate Dr, Haubstadt, IN 47639. On November 8, 2023, the Office of Air Quality (OAQ) received an application from the source relating to the following:

- (1) The source name is being changed from Raben Tire Company, Inc. to The Goodyear Tire and Rubber Company.
- (2) The source address is being updated, but the source location has not changed. The source stated that their records list the official address for the plant as 12624 S Northgate Dr. It is not clear why the source address was previously 12580 S Northgate Dr.
- (3) The general source phone number is being updated to (812) 753-4792.
- (3) The source has two existing tire grinding and repair stations, collectively identified as BUF. The integral cyclones were replaced with a direct blower system in 2020. Additionally, the source has clarified that each tire grinding and repair station has a maximum capacity of 25 tire/hr. Previously, the registration incorrectly indicated that the maximum capacity of the two tire grinding and repair stations was 25 tire/hr, combined. The tire grinding and repair stations BUF have not been physically modified.
- (4) The source has constructed a new tire curing chamber in 2023 and a new electric water heater in 2020. The maximum throughput for the new tire curing chamber CUR2 is 26 tires per hour, however it is bottlenecked by other processes at the source. The bottlenecked throughput is 25 tires per hour.
- (5) The source has removed one of the existing tire curing chambers and the natural gasfired water heater HEAT.
- (6) The source has stated that BUF, CUR1, CUR2, and the electric water heater all exhaust outdoors. The source did not explain why the exhaust locations for BUF and CUR1 are being updated.
- (7) Paved roads have been added to the permit. The source stated that the maximum oneway distance traveled by vehicles is 1,795,200 feet per trip. However, the source property only has approximately 1,500 feet of road on the property.



Pursuant to 326 IAC 2-5.5-6, the registration is hereby amended as described in the attached Technical Support Document. All other conditions of the registration shall remain unchanged and in effect. Please find attached the entire registration as amended.

A copy of the registration is available on the Internet at: <u>http://www.in.gov/ai/appfiles/idem-caats/</u>. A copy of the application and registration is also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: <u>https://www.in.gov/idem/</u> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <u>https://www.in.gov/idem/airpermit/public-participation/</u>; and the Citizens' Guide to IDEM on the Internet at: <u>https://www.in.gov/idem/resources/citizens-guide-to-idem/</u>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions regarding this matter, please contact Tessa Dedek, Indiana Department of Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-5401 or (800) 451-6027, and ask for Tessa Dedek.

Sincerely

Heath Hartley, Section Chief Permits Branch Office of Air Quality

Attachment(s): Revised Registration and Technical Support Document

cc: File - Gibson County Gibson County Health Department Compliance and Enforcement Branch IDEM Southwest Regional Office



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# REGISTRATION OFFICE OF AIR QUALITY

## The Goodyear Tire & Rubber Company 12624 S Northgate Dr Haubstadt, Indiana 47639

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No.: R051-21538-00047

Master Agency Interest ID: 37693

Original Signed by: Nysa L. James, Section Chief Permits Branch, Office of Air Quality

Issuance Date: September 16, 2005

Registration Notice-Only Change No. 051-28145-00047, issued on October 13, 2009 Registration Notice Only Change No. 051-29138-00047, issued on May 3, 2010

Registration Administrative Amendment No.: 051-47	201-00047
Issued by: Heath Hartley, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 25, 2024



#### **SECTION A**

#### SOURCE SUMMARY

This registration is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a stationary truck tire retreading operation.

#### A.2 Emission Units and Pollution Control Equipment Summary This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) tire grinding and repair stations, collectively identified as BUF, each constructed in 2005, each with a maximum capacity of 25 tires per hour, collectively controlled by an integral direct blower system, and exhausting indoors.
- (b) One (1) tire dissolution application and repair operation, identified as REP, constructed in 2005, with a maximum capacity of 25 tires per hour, with emissions exhausting to stacks B and D.
- (c) Two (2) tire extruding/building machines, identified as TB, constructed in 2005, with a maximum capacity of 25 tires per hour, with emissions exhausting to stacks B and D.
- (d) Two (2) tire curing chambers, each using no control, and each exhausting outdoors, including:

		Maximum
Emission	Construction	Capacity
Unit	Year	(tire/hr)
CUR1	2005	25
CUR2	2023	25

- (e) One (1) electric water heater, constructed in 2023 and permitted in 2024, using no control, and exhausting outdoors.
- (f) Paved roads.

#### **SECTION B**

#### **GENERAL CONDITIONS**

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this registration shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

- B.2 Effective Date of Registration [IC 13-15-5-3] Pursuant to IC 13-15-5-3, this registration R051-21538-00047 is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.
- B.3
   Registration Revocation [326 IAC 2-1.1-9]

   Pursuant to 326 IAC 2-1.1-9 (Revocation), this registration to operate may be revoked for any of the following causes:
  - (a) Violation of any conditions of this registration.
  - (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
  - (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
  - (d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

#### B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to Registration No. R051-21538-00047 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.
- B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)] Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):
  - (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
  - (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management Compliance and Enforcement Branch, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, IN 46204-2251 (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

### B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

- B.7
   Registrations [326 IAC 2-5.1-2(i)]

   Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.
- B.8 Preventive Maintenance Plan [326 IAC 1-6-3]
  - (a) If required by specific condition(s) in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this registration or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
    - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
    - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
    - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Registrant's control, the PMPs cannot be prepared and maintained within the above time frame, the Registrant may extend the date an additional ninety (90) days provided the Registrant notifies:

Indiana Department of Environmental Management Compliance and Enforcement Branch, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

The Registrant shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Registrant to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Registrant is required by 40 CFR Part 60 or 40 CFR Part 63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such OMM Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

#### SECTION C

## SOURCE OPERATION CONDITIONS

#### Entire Source

#### Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

C.1 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this registration:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

#### Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)]

- C.3 General Record Keeping Requirements [326 IAC 2-5.1-3(e)(2)]
  - (a) Records of all required monitoring data, reports and support information required by this registration shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Registrant, the Registrant shall furnish the records to the Commissioner within a reasonable time.
  - (b) Unless otherwise specified in this registration, for all record keeping requirements not already legally required, the Registrant shall be allowed up to ninety (90) days from the date of registration issuance or the date of initial start-up, whichever is later, to begin such record keeping.

#### **SECTION D.1**

#### EMISSION UNIT OPERATION CONDITIONS

#### Emission Unit Description:

- (a) Two (2) tire grinding and repair stations, collectively identified as BUF, each constructed in 2005, each with a maximum capacity of 25 tires per hour, collectively controlled by an integral direct blower system, and exhausting indoors.
- (b) One (1) tire dissolution application and repair operation, identified as REP, constructed in 2005, with a maximum capacity of 25 tires per hour, with emissions exhausting to stacks B and D.
- (c) Two (2) tire extruding/building machines, identified as TB, constructed in 2005, with a maximum capacity of 25 tires per hour, with emissions exhausting to stacks B and D.
- (d) Two (2) tire curing chambers, each using no control, and each exhausting outdoors, including:

Emission Unit	Construction Year	Maximum Capacity (tire/hr)
CUR1	2005	25
CUR2	2023	25

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

#### D.1.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the tire retreading line (including the tire grinding and repair stations BUF, the tire dissolution application and repair operation REP, the tire extruding and building machines TB, and the tire curing chambers CUR1 and CUR2) shall not exceed 2.03 lb/hr when operating at a maximum process weight of 0.35 ton/hr.

The pound per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

#### Compliance Determination Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.1.3 Particulate Control

In order to assure that the source maintains its Registration status under 326 IAC 2-5.5 and in order to assure compliance with the requirements of 326 IAC 6-3-2, the integral direct blower system for particulate control shall be in operation and control emissions from the tire grinding and repair stations BUF at all times the tire grinding and repair stations BUF are in operation.

Compliance with this condition, combined with the potential to emit PM, PM<sub>10</sub>, and PM<sub>2.5</sub> from all other emission units at the source, shall assure the PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from the entire source are less than 25 tons per twelve (12) consecutive month period, each.

### Compliance Monitoring Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.1.4 Direct Blower System Inspections

The Permittee shall perform quarterly inspections of the integral direct blower system controlling particulate from the tire grinding and repair stations BUF to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months.

### Record Keeping and Reporting Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

- D.1.5 Record Keeping Requirements
  - (a) To document the compliance status with Condition D.1.4, the Permittee shall maintain records of the dates and results of the inspections.
  - (b) Section C General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH

### REGISTRATION ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Company Name:	The Goodyear Tire & Rubber Company
Source Address:	12624 S Northgate Dr
City:	Haubstadt, Indiana 47639
Phone Number:	(812) 753-4792
Registration No.:	R051-21538-00047

I hereby certify that The Goodyear Tire & Rubber Company is: I hereby certify that The Goodyear Tire & Rubber Company is: ☐ still in operation.

□ no longer in operation.

□ in compliance with the requirements of Registration No. R051-21538-00047.

□ not in compliance with the requirements of Registration No. R051-21538-00047.

Authorized Individual (typed):				
Title:				
Signature:	Date:			
Email Address:	Phone:			

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:		

## Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Registration Administrative Amendment

#### **Source Description and Location**

Source Name:	The Goodyear Tire & Rubber Company
Source Location:	12624 S Northgate Dr, Haubstadt, Indiana 47639
County:	Gibson
SIC Code:	7534 (Tire Retreading & Repair Shops)
Registration No.:	R051-21538-00047
Registration Issuance Date:	September 16, 2005
Registration Administrative Amendment No.:	051-47201-00047
Permit Reviewer:	Tessa Dedek

On November 8, 2023, the Office of Air Quality (OAQ) received an application from The Goodyear Tire & Rubbing Company related to changes at an existing stationary truck tire retreading operation.

#### **Existing Approvals**

The source was issued Registration No. R051-21538-00047 on September 16, 2005. The source has since received the following approvals:

Permit Type	Permit Number	Issuance Date
Notice-Only Change	051-28145-00047	October 13, 2009
Notice-Only Change	051-29138-00047	May 3, 2010

#### **County Attainment Status**

The source is located in Gibson County.

Pursuant to amendments to Indiana Code IC 13-17-3-14, effective July 1, 2023, a federal regulation that classifies or amends a designation of attainment, nonattainment, or unclassifiable for any area in Indiana under the federal Clean Air Act is effective and enforceable in Indiana on the effective date of the federal regulation.

Pollutant	Designation
SO <sub>2</sub>	Unclassifiable or attainment effective September 12, 2016, for the 2010 primary 1-hour SO <sub>2</sub> standard. Cannot be classified effective March 3, 1978, for the national secondary standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O3	Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour $PM_{2.5}$ standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO <sub>2</sub> standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

#### (a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air

Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Gibson County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) PM<sub>2.5</sub> Gibson County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NOx emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Other Criteria Pollutants Gibson County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions** 

The fugitive emissions of regulated air pollutants and hazardous air pollutants (HAP) are counted toward the determination of Registration (326 IAC 2-5.1-5) applicability and source status under Section 112 of the Clean Air Act (CAA).

## Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at <u>http://www.supremecourt.gov/opinions/13pdf/12-1146\_4g18.pdf</u>) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

#### **Source Status - Existing Source**

This table reflects the unrestricted potential emissions of the source prior to the proposed administrative amendment. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

Unrestricted Source-Wide Emissions Prior to Administrative Amendment (tpy)								
PM1     PM10 <sup>1</sup> PM2.5 <sup>1, 2</sup> SO2     NOx     VOC     CO     Single HAP3     Total HAPs								
5.29	28.83	28.83		0.41	7.12	0.35	0.003	5.14
< 5	< 5	< 5	< 10	< 10	< 10	< 25	< 10	< 25
< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 10	< 25
	<b>PM</b> <sup>1</sup> 5.29 < 5	PM1         PM101           5.29         28.83           < 5	PM1         PM101         PM2.51, 2           5.29         28.83         28.83           < 5	PM1         PM101         PM2.51, 2         SO2           5.29         28.83         28.83            < 5	PM1         PM101         PM2.51,2         SO2         NOx           5.29         28.83         28.83          0.41           < 5	PM1         PM101         PM2.51,2         SO2         NOx         VOC           5.29         28.83         28.83          0.41         7.12           < 5	PM1         PM101         PM2.51,2         SO2         NOx         VOC         CO           5.29         28.83         28.83          0.41         7.12         0.35           < 5	PM1         PM101         PM2.51,2         SO2         NOx         VOC         CO         Single HAP3           5.29         28.83         28.83          0.41         7.12         0.35         0.003           < 5

<sup>1</sup>Under the Part 70 Permit program (40 CFR 70), PM<sub>10</sub> and PM<sub>2.5</sub>, not particulate matter (PM), are each considered as a "regulated air pollutant."

<sup>2</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

	Unrestricted Source-Wide Emissions Prior to Administrative Amendment (tpy)						
	PM1         PM101         PM2.51,2         SO2         NOx         VOC         CO         Single HAP3         Total HAPs						
<sup>3</sup> Single highest source-wide HAP is lead. <sup>4</sup> IDEM OAQ previously determined that the former cyclones should be considered an integral part of the tire grinding and repair stations BUF. Therefore, the potential to emit PM, PM <sub>10</sub> , and PM <sub>2.5</sub> from both tire grinding and repair stations BUF was calculated after the former cyclones for purposes of determining permitting level & applicability of 326 IAC 2-2 and 326 IAC 6-3.							BUF was

These emissions are based on the TSD of Registration Notice-Only Change No. 051-29138-00047, issued on May 3, 2010.

#### Emission Units and Pollution Control Equipment Constructed Under the Provisions of 326 IAC 2-1.1-3 (Exemptions)

As part of this permitting action, the source requested to add the following existing emission unit(s) constructed under the provisions of 326 IAC 2-1.1-3 (Exemptions):

(a) One (1) tire curing chamber, using no control, and exhausting outdoors, including:

		Maximum
Emission	Construction	Capacity
Unit	Year	(tire/hr)
CUR2	2023	25

- (b) One (1) electric water heater, constructed in 2023 and permitted in 2024, using no control, and exhausting outdoors.
- (c) Paved roads.

The total potential to emit of the emission unit(s) is less than levels specified at 326 IAC 2-1.1-3(e)(1)(A) through (G) and the addition of the emission unit(s) did not require the source to transition to a higher operation permit level. Therefore, pursuant to 326 IAC 2-5.5-5(d), the registration requirements under 326 IAC 2-5.5-6(g) do not apply to the emission unit(s). See Appendix A of this Technical Support Document for detailed emission calculations.

#### **Description of Amendment**

The Office of Air Quality (OAQ) has reviewed an application, submitted by The Goodyear Tire & Rubber Company on November 8, 2023, relating to the following:

- (1) The source name is being changed from Raben Tire Company, Inc. to The Goodyear Tire and Rubber Company.
- (2) The source address is being updated, but the source location has not changed. The source stated that their records list the official address for the plant as 12624 S Northgate Dr. It is not clear why the source address was previously 12580 S Northgate Dr.
- (3) The general source phone number is being updated to (812) 753-4792.
- (3) The source has two existing tire grinding and repair stations, collectively identified as BUF. The integral cyclones were replaced with a direct blower system in 2020. Additionally, the source has clarified that each tire grinding and repair station has a maximum capacity of 25 tire/hr. Previously, the registration incorrectly indicated that the maximum capacity of the two tire grinding and repair stations was 25 tire/hr, combined. The tire grinding and repair stations BUF have not been physically modified.

- (4) The source has constructed a new tire curing chamber in 2023 and a new electric water heater in 2020. The maximum throughput for the new tire curing chamber CUR2 is 26 tires per hour, however it is bottlenecked by other processes at the source. The bottlenecked throughput is 25 tires per hour.
- (5) The source has removed one of the existing tire curing chambers and the natural gas-fired water heater HEAT.
- (6) The source has stated that BUF, CUR1, CUR2, and the electric water heater all exhaust outdoors. The source did not explain why the exhaust locations for BUF and CUR1 are being updated.
- (7) Paved roads have been added to the permit. The source stated that the maximum one-way distance traveled by vehicles is 1,795,200 feet per trip. However, the source property only has approximately 1,500 feet of road on the property.

As part of this permitting action, the following emission units are being removed from the registration:

(a) One (1) natural gas-fired water heater, identified as HEAT, constructed as 2005, with a rated capacity of 0.97 MMBtu/hr, with emissions exhausting to stack A.

#### "Integral Part of the Process" Determination

The source submitted the following information to justify why the direct blower system should be considered an integral part of the two existing tire grinding and repair stations BUF:

- (a) The source has two existing tire grinding and repair stations, collectively identified as BUF. The integral cyclones were replaced with a direct blower system in 2020. The tire grinding and repair stations BUF have not been physically modified.
- (b) The source claims that the primary purpose of the direct blower system is product recovery rather than environmental compliance. The direct blower system is used to move rubber dust away from the buffer and blades to protect the machine and to collect the rubber particulate dust for transport to a recycling company.

The two tire grinding and repair stations BUF are connected to a blower and a recycle collection trailer. A water mister is mounted on the tire buffer to control opacity and the temperature of the knives during the rasping process. Particulate removal is accomplished by the blower creating a vacuum/suction at the point of tire and rasp contact. The material is pulled into the blower and collected in the rubber recycle trailer for transport, removal, and recycle off-site. The rubber particle collection system facilitates the movement of the buffed rubber material away from the buffing machine; without this equipment, the buffer would quickly plug due to the accumulation of buffed material. The buffing machines cannot operate in production mode without the blower being operational.

(c) The direct blower system is specifically used to collect and recycle valuable raw material for sale. The source has provided the following economic analysis to justify why collecting the raw material also provides a significant economic benefit for the source. Please see Appendix A of this TSD for detailed calculations.

Capital Costs		
- Blower		\$20,000
	Total Capital Costs, P:	\$20,000
	Lifetime of Equipment, N:	10 yr
	Interest Rate, i:	7%
Α	nnualized Capital Costs, A:	\$2,848/yr

Annual Costs	
- Electrical Costs (\$0.27/hr, 8 hr/day, 5 day/wk, 50 wk/yr)	\$540/yr
- Maintenance Costs	
- Electric motors (3 electric motors per lifetime of equipment, \$2,200 per motor)	\$660/yr
- Drive belts (3 drive belts per lifetime of equipment, \$100 per belt)	\$30/yr
- Hoses (3 hoses per lifetime of equipment, \$200 per hose)	\$60/yr
Total Annual Costs:	\$1,290/yr

Amount of Product Recovered (lb/yr)	Product Value (\$/lb)	Product Recovery Value (\$/yr)	Total Annual Cost of Recovery Equipment (\$/yr)	Total Annual Savings (\$/yr)
347,189	\$0.04	\$13,888	\$4,138	\$9,750

IDEM, OAQ evaluated the information submitted and agrees that the direct blower system should be considered an integral part of the two tire grinding and repair stations BUF. Therefore, the potential to emit PM, PM<sub>10</sub>, and PM<sub>2.5</sub> from the two tire grinding and repair stations BUF were calculated after the direct blower system for purposes of determining permitting level and applicability of 326 IAC 2-2 and 326 IAC 6-3. Operating conditions in the proposed permit will specify that this direct blower system shall operate at all times the tire grinding and repair stations BUF are in operation.

## Enforcement Issues

There are no pending enforcement actions related to this administrative amendment.

#### **Emission Calculations**

See Appendix A of this Technical Support Document for detailed emission calculations.

#### Permit Level Determination – Registration Administrative Amendment

The following table is used to determine the appropriate revision level under 326 IAC 2-5.5-6. This table reflects the PTE before controls of the administrative amendment. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

		PTE Before Controls of the New Emission Units (ton/yr)							
Process / Emission Unit	РМ	PM10	PM <sub>2.5</sub> <sup>1</sup>	SO <sub>2</sub>	NOx	VOC	со	Single HAP <sup>2</sup>	Total HAPs
Tire Curing Chamber CUR2						0.12		0.01	0.05
Electric Water Heater									
Total PTE Before Controls of the New Emission Units:          0.12        0.01       0.05									
<sup>1</sup> PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> . <sup>2</sup> Single highest HAP is m-xylene + p-xylene.									

Appendix A of this TSD reflects the detailed potential emissions of the administrative amendment.

Pursuant to 326 IAC 2-5.5-6(d)(2)(A), 326 IAC 2-5.5-6(d)(9), and 326 IAC 2-5.5-6(d)(11), this change to the registration is considered an administrative amendment because of the following.

(a) The registration is amended to indicate changes to the name, address, or telephone number of any person identified in the registration.

(b) The registration is amended to add or modify emissions unit(s) described under 326 IAC 2-1.1-3(e)(1) through 326 IAC 2-1.1-3(e)(31). The total potential to emit of the emission unit(s) is less than levels specified at 326 IAC 2-1.1-3(e)(1)(A) through (G) and the addition of the emission unit(s) did not require the source to transition to a higher operation permit level.

## PTE of the Entire Source After Issuance of the Registration Administrative Amendment

The table below summarizes the after issuance source-wide unrestricted potential to emit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

		Unrestricted Source-Wide Emissions After Issuance (ton/yr)								
	РМ	P <b>M</b> 10 <sup>1</sup>	PM <sub>2.5</sub> <sup>1, 2</sup>	SO <sub>2</sub>	NOx	voc	со	Pb	Single HAP <sup>3</sup>	Total HAPs
Total PTE of Entire Source Including Source- Wide Fugitives	8.91	8.49	8.41			7.19		6.23E-03	0.08	0.55
Exemption Levels	< 5	< 5	< 5	< 10	< 10	< 10	< 25	< 0.2	< 10	< 25
Registration Levels	< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 5	< 10	< 25

<sup>1</sup>Under the Part 70 Permit program (40 CFR 70), PM<sub>10</sub> and PM<sub>2.5</sub>, not particulate matter (PM), are each considered as a "regulated air pollutant."

<sup>2</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

<sup>3</sup>Single highest source-wide HAP is 1,3-butadiene.

<sup>4</sup>IDEM OAQ determined that the direct blower system should be considered an integral part of the two tire grinding and repair stations BUF. Therefore, the potential to emit PM, PM<sub>10</sub>, and PM<sub>2.5</sub> from both tire grinding and repair stations BUF was calculated after the former cyclones for purposes of determining permitting level & applicability of 326 IAC 2-2 and 326 IAC 6-3.

- (a) This administrative amendment will not change the registration status of the source, because the source-wide uncontrolled/unlimited potential to emit of PM, PM<sub>10</sub>, and PM<sub>2.5</sub> will each still be within the ranges listed in 326 IAC 2-5.5-1(b)(1) and the potential to emit of all other regulated air pollutants will each still be less than the ranges listed in 326 IAC 2-5.5-1(b)(1). Therefore, the source will still be subject to the provisions of 326 IAC 2-5.5 (Registrations).
- (b) This administrative amendment will not change the registration status of the source, because the source-wide uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the uncontrolled/unlimited potential to emit of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.5 (Registrations). This source is an area source under Section 112 of the Clean Air Act (CAA).

## Federal Rule Applicability Determination

Due to this administrative amendment, federal rule applicability has been reviewed as follows:

#### New Source Performance Standards (NSPS):

- (a) The requirements of the Standards of Performance for Fossil-Fuel-Fired Steam Generators, 40 CFR 60, Subpart D, and 326 IAC 12, are not included in the registration for the electric water heater because it is not a fossil-fuel-fired or wood-residue-fired steam generating unit. This unit is an electric water heater.
- (b) The requirements of the Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Db, and 326 IAC 12, are not included in the registration for

the electric water heater because it is not a steam generating unit, as defined in 40 CFR 60.41b, because it does not combust any fuel or byproduct/waste. This unit is an electric water heater.

- (c) The requirements of the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, and 326 IAC 12, are not included in the registration for the electric water heater because it is not a steam generating unit, as defined in 40 CFR 60.41c, because it does not combust any fuel. This unit is an electric water heater.
- (d) The requirements of the Standards of Performance for the Rubber Tire Manufacturing Industry, 40 CFR 60, Subpart BBB, and 326 IAC 12, are not included in the registration for this source because it is not a rubber tire manufacturing plant. This source is a truck tire retreading operation
- (e) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the registration.

#### National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Rubber Tire Manufacturing, 40 CFR 63, Subpart XXXX, and 326 IAC 20-55 are not included in the registration for this source since it is not a major source of HAPs.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD, and 326 IAC 20-95, are not included in the registration for the electric water heater since it is not considered a boiler, as defined in 40 CFR 63.7575, because it does not use combustion. This unit is an electric water heater. Additionally, this source is not a major source of HAPs.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ, are not included in the registration for the electric water heater since it is not considered a boiler, as defined in 40 CFR 63.11237, because it does not use combustion. This unit is an electric water heater.
- (d) There are no National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14, and 326 IAC 20 included in the registration.

#### Compliance Assurance Monitoring (CAM):

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the registration, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

## State Rule Applicability - Entire Source

Due to this administrative amendment, state rule applicability has been reviewed as follows:

#### 326 IAC 2-5.5 (Registrations)

Registration applicability is discussed under the PTE of the Entire Source After Issuance of the Registration Administrative amendment section of this document.

#### 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The new emission unit(s) will emit less than ten (10) tons per year for a single HAP and less than twentyfive (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

#### 326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an

operating permit pursuant to 326 IAC 2-7 (Part 70), it is not located in Lake or Porter County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

### 326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this registrant:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

## 326 IAC 6-4 (Fugitive Dust Emissions Limitations)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

#### 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

#### 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-1(a), this source (located in Gibson County) is not subject to the requirements of 326 IAC 6.5, because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

#### 326 IAC 6.8 (Particulate Matter Limitations for Lake County)

Pursuant to 326 IAC 6.8-1-1(a), this source (located in Gibson County) is not subject to the requirements of 326 IAC 6.8, because it is not located in Lake County.

#### 326 IAC 6.8-10 (Lake County: Fugitive Particulate Matter)

Pursuant to 326 IAC 6.8-10-1, this source (located in Gibson County) is not subject to the requirements of 326 IAC 6.8-10, because it is not located in Lake County.

#### State Rule Applicability – Individual Facilities

Due to this administrative amendment, state rule applicability has been reviewed as follows:

#### <u>Tire Grinding and Repair Stations BUF, Tire Dissolution Application and Repair Operation REP,</u> <u>Tire Extruding and Building Machines TB, and Tire Curing Chambers CUR1 and CUR2</u>

#### 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the tire retreading line (including the tire grinding and repair stations BUF, the tire dissolution application and repair operation REP, the tire extruding and building machines TB, and the tire curing chambers CUR1 and CUR2) since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the tire retreading line shall not exceed 2.03 lb/hr when operating at a process weight rate of 0.35 ton/hr. The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

E = 4.10 P <sup>0.67</sup>	where	E = rate of emission in pounds per hour and
		P = process weight rate in tons per hour

The direct blower system shall be in operation at all times the tire retreading line is in operation in order to comply with this limit.

#### 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though the tire grinding and repair stations BUF, the tire dissolution application and repair operation REP, the tire extruding and building machines TB, and the tire curing chambers CUR1 and CUR2 were each constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6, because the unlimited VOC potential emissions of each unit are less than twenty-five (25) tons per year.

#### Proposed Changes

The following changes listed below are due to the administrative amendment. Deleted language appears as strikethrough text and new language appears as **bold** text:

(1) The source name, address, and general phone number have been updated throughout the registration.

Company Name: Raben Tire Company, Inc. The Goodyear Tire & Rubber Company

- (2) The existing direct blower system has been added to the emission unit description for the two tire grinding and repair stations BUF. The description has also been updated to clarify that each tire grinding and repair station has a maximum capacity of 25 tire/hr and that the units exhaust indoors now.
- (3) The existing tire curing chamber CUR2, the existing electric water heater, and the existing paved roads have been added to the registration.
- (4) The description of CUR1 has been updated to clarify that this unit exhausts outdoors now.
- (5) One of the tire curing chambers and the natural gas-fired water heater have been removed from the registration.
- (6) Conditions D.1.4, D.1.5, and C.3 have been added to the permit to assure that the integral direct blower system will be in operation and control emissions from the tire grinding and repair stations BUF at all times the tire grinding and repair stations BUF are in operation.

#### **Additional Changes**

Upon further review, IDEM, OAQ has decided to make the following changes to the registration. Deleted language appears as strikethrough text and new language appears as **bold** text:

(1) The Registration Annual Notification Form has been revised to include space for an email address and phone number.

\*\*\*\*

A.1 General Information

The Registrant owns and operates a stationary truck tire retreading operation.

Source Address:

12580 South Northgate Drive, Haubstadt, Indiana 47639 12624 S Northgate Dr, Haubstadt, Indiana 47639

General Source Phone Number:	<del>(812) 306-7431</del>
	(812) 753-4792
SIC Code:	7534 (Tire Retreading and Repair Shops)

\*\*\*\*

#### A.2 Emission Units and Pollution Control Equipment Summary

This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) tire grinding and repair stations, collectively identified as BUF, each constructed in 2005, each with a maximum capacity of 25 tires per hour, each controlled by an integral tire grinding dust collection system, which includes two (2) cyclones, identified as Cyclone 1 and Cyclone 2, direct blower system, that exhaust to stacks C1 and C2, respectively and exhausting indoors.
- (b) One (1) tire dissolution application and repair operation, identified as REP, constructed in 2005, with a maximum capacity of 25 tires per hour, with emissions exhausting to stacks B and D.
- (c) Two (2) tire extruding/building machines, identified as TB, constructed in 2005, with a maximum capacity of 25 tires per hour, with emissions exhausting to stacks B and D outdoors.
- (d) Two (2) tire curing chambers, identified as CUR, constructed in 2005, with a maximum capacity of 25 tires per hour, uncontrolled and exhausting to stacks B and D.
- (d) Two (2) tire curing chambers, each using no control, and each exhausting outdoors, including:

Emission Unit	Construction Year	Maximum Capacity (tire/hr)
CUR1	2005	25
CUR2	2023	25

- (e) One (1) natural-gas fired water heater, identified as HEAT, constructed in 2005, with a rated capacity of 0.97 MMBtu/hr, with emissions exhausting to stack A.
- (e) One (1) electric water heater, constructed in 2023 and permitted in 2024, using no control.
- (f) Paved roads.

\*\*\*\*

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration **R051-21538-00047** is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

B.3 Registration Revocation [326 IAC 2-1.1-9]

\*\*\*\*

- (d) For any cause which establishes in the judgment of **IDEM** the fact that continuance of this registration is not consistent with purposes of this article.
- B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]
  - (a) All terms and conditions of permits established prior to Registration No.

**R**051-21538-00047 and issued pursuant to permitting programs approved into the state implementation plan have been either:

#### \*\*\*\*

#### B.8 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permitregistration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permitregistration or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

\*\*\*\*

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

\*\*\*\*

The PermitteeRegistrant shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Registrant to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions-or potential to emit.

\*\*\*\*

#### Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

C.1 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in **326 IAC 5-1-1** (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this registration:

\*\*\*\*

## Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)]

## C.3 General Record Keeping Requirements [326 IAC 2-5.1-3(e)(2)]

- (a) Records of all required monitoring data, reports and support information required by this registration shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Registrant, the Registrant shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this registration, for all record keeping requirements not already legally required, the Registrant shall be allowed up to ninety (90) days from the date of registration issuance or the date of initial start-up, whichever is later, to begin such record keeping.

\*\*\*\*

#### SECTION D.1 EMISSION UNIT OPERATION CONDITIONS

#### **Emission Unit Description:**

(a) Two (2) tire grinding and repair stations, **collectively** identified as BUF, **each** constructed in 2005, **each** with a maximum capacity of 25 tires per hour, **each** controlled by an integral tire

grinding dust collection system, which includes two (2) cyclones, identified as Cyclone 1 and Cyclone 2, direct blower system, that exhaust to stacks C1 and C2, respectively and exhausting indoors.

- (b) One (1) tire dissolution application and repair operation, identified as REP, constructed in 2005, with a maximum capacity of 25 tires per hour, with emissions exhausting to stacks B and D.
- (c) Two (2) tire extruding/building machines, identified as TB, constructed in 2005, with a maximum capacity of 25 tires per hour, with emissions exhausting to stacks B and D outdoors.
- (d) Two (2) tire curing chambers, identified as CUR, constructed in 2005, with a maximum capacity of 25 tires per hour, uncontrolled and exhausting to stacks B and D.
- (d) Two (2) tire curing chambers, each using no control, and each exhausting outdoors, including:

Emission Unit	Construction Year	Maximum Capacity (tire/hr)
CUR1	2005	25
CUR2	2023	25

(e) One (1) natural-gas fired water heater, identified as HEAT, constructed in 2005, with a rated capacity of 0.97 MMBtu/hr, with emissions exhausting to stack A.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

## Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

#### D.1.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the tire grinding line shall not exceed 1.15 pounds per hour when operating at a process weight rate of 0.15 tons per hour.

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the tire retreading line (including the tire grinding and repair stations BUF, the tire dissolution application and repair operation REP, the tire extruding and building machines TB, and the tire curing chambers CUR1 and CUR2) shall not exceed 2.03 lb/hr when operating at a maximum process weight of 0.35 ton/hr.

The pound per hour limitation was calculated with **using** the following equation:

Interpolation and extrapolation of the data for the process weight rate up to **sixty thousand** (60,000) pounds per hour shall be accomplished by use of the equation:

E = 4.10 P <sup>0.67</sup>	where	E = rate of emission in pounds per hour and
		P = process weight rate in tons per hour

The cyclones, identified as Cyclone 1 and Cyclone 2, shall be in operation at all times the tire grinding and repair stations, identified as BUF, are in operation, in order to comply with this limit.

#### D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)] [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for this facility these facilities and its any control devices. Section B - Preventive Maintenance Plan contains the Registrant's obligation with

regard to the preventive maintenance plan required by this condition.

\*\*\*\*

Compliance Determination Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

#### D.1.3 Particulate Control

In order to assure that the source maintains its Registration status under 326 IAC 2-5.5 and in order to assure compliance with the requirements of 326 IAC 6-3-2, the integral direct blower system for particulate control shall be in operation and control emissions from the tire grinding and repair stations BUF at all times the tire grinding and repair stations BUF are in operation.

Compliance with this condition, combined with the potential to emit PM,  $PM_{10}$ , and  $PM_{2.5}$  from all other emission units at the source, shall assure the PM,  $PM_{10}$ , and  $PM_{2.5}$  emissions from the entire source are less than 25 tons per twelve (12) consecutive month period, each.

Compliance Monitoring Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

### D.1.4 Direct Blower System Inspections

The Permittee shall perform quarterly inspections of the integral direct blower system controlling particulate from the tire grinding and repair stations BUF to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

#### D.1.5 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.4, the Permittee shall maintain records of the dates and results of the inspections.
- (b) Section C General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

\*\*\*\*

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH

#### REGISTRATION ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Company Name:	Raben Tire Company, Inc. The Goodyear Tire & Rubber Company
Source Address:	12580 South Northgate Drive 12624 S Northgate Dr
City:	Haubstadt, Indiana 47639
Phone Number:	<del>(812) 306-7431</del> (812) 753-4792
Registration No.:	<b>R</b> 051-21538-00047

\*\*\*\*

Authorized Individual (typed): Title:

Signaturo:	
Phone Number:	
Signature:	Date:
Date Email Address:	Phone:

\*\*\*\*

#### **Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on November 8, 2023. Additional information was received on November 21, 2023, January 15, 2024, April 11, 2024, April 30, 2024, and May 21, 2024.

#### **IDEM Contact**

- (a) If you have any questions regarding this permit, please contact Tessa Dedek, Indiana Department of Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-5401 or (800) 451-6027, and ask for Tessa Dedek.
- (b) A copy of the findings is available on the Internet at: <u>http://www.in.gov/ai/appfiles/idem-caats/</u>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <u>https://www.in.gov/idem/airpermit/public-participation/;</u> and the Citizens' Guide to IDEM on the Internet at: <u>https://www.in.gov/idem/resources/citizens-guide-to-idem/</u>.

#### Appendix A: Emission Calculations PTE Summary

Company Name:The Goodyear Tire & Rubber CompanySource Address:12624 S Northgate Dr, Haubstadt, Indiana 47639Permit Number:051-47201-00047Reviewer:Tessa Dedek

		Potential to Emit Prior to Integral Control <sup>1, 2</sup> (tpy)								
Emissions Unit	РМ	PM <sub>10</sub>	PM <sub>2.5</sub> <sup>3</sup>	SO <sub>2</sub>	NO <sub>x</sub>	voc	со	Lead	Single HAP <sup>4</sup>	Total HAPs <sup>5</sup>
Tire Grinding & Repair Stations BUF	1,677.71	1,677.71	1,677.71			1.60		6.23E-03	0.08	0.44
Tire Dissolution Application & Repair Operation REP						5.34				
Tire Extruding & Building Machines TB						4.45E-03				0.02
Tire Curing Chambers CUR1 & CUR2		-			-	0.24				0.09
Electric Water Heater		-			-					
Total:	1,677.71	1,677.71	1,677.71		1	7.18		6.23E-03	0.08	0.55
Fugitive Emissions										
Paved Roads	0.52	0.10	0.03							
Total Fugitives:	0.52	0.10	0.03							
Source-Wide Total:	1,678.23	1,677.82	1,677.74			7.18		6.23E-03	0.08	0.55

	Potential to Emit After Integral Control <sup>1, 2</sup> (tpy)									
Emissions Unit	РМ	PM <sub>10</sub>	PM <sub>2.5</sub> <sup>3</sup>	SO₂	NO <sub>x</sub>	voc	со	Lead	Single HAP <sup>4</sup>	Total HAPs <sup>5</sup>
Tire Grinding & Repair Stations BUF	8.39	8.39	8.39			1.60		0.01	0.08	0.44
Tire Dissolution Application & Repair Operation REP						5.34				
Tire Extruding & Building Machines TB						0.00				0.02
Tire Curing Chambers CUR1 & CUR2						0.24				0.09
Electric Water Heater										
Total:	8.39	8.39	8.39			7.18		6.23E-03	0.08	0.55
Fugitive Emissions								-		
Paved Roads	0.52	0.10	0.03							
Total Fugitives:	0.52	0.10	0.03							
Source-Wide Total:	8.91	8.49	8.41			7.18		6.23E-03	0.08	0.55

#### Notes:

<sup>1</sup>IDEM, OAQ, has determined that the direct blower system should be considered an integral part of the two tire grinding and repair stations BUF.

Therefore, the potential to emit PM, PM<sub>10</sub>, and PM<sub>2.5</sub> from the two tire grinding and repair stations BUF were calculated after the direct blower

system for purposes of determining permitting level and applicability of 326 IAC 2-2 and 326 IAC 6-3.

<sup>2</sup>The electric water heater produces negligible emissions.

<sup>3</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

<sup>4</sup>The highest single HAP is 1,3-butadiene.

<sup>5</sup>Fugitve HAP emissions are always included in the source-wide emissions.

## Appendix A: Emission Calculations New Emission Units PTE Summary

Company Name:The Goodyear Tire & Rubber CompanySource Address:12624 S Northgate Dr, Haubstadt, Indiana 47639Permit Number:051-47201-00047Reviewer:Tessa Dedek

		New Units Uncontrolled Potential to Emit <sup>1</sup> (tpy)								
Emissions Unit	РМ	<b>PM</b> <sub>10</sub>	PM <sub>2.5</sub> <sup>2</sup>	SO <sub>2</sub>	NO <sub>x</sub>	voc	со	Single HAP <sup>3</sup>	Total HAPs⁴	
Tire Curing Chamber CUR2						0.12		0.01	0.05	
Electric Water Heater										
Total:						0.12		0.01	0.05	

## Notes:

<sup>1</sup>The electric water heater produces negligible emissions.

<sup>2</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

<sup>3</sup>The highest single HAP is m-xylene + p-xylene.

<sup>4</sup>Fugitve HAP emissions are always included in the source-wide emissions.

#### Integral Evaluation Data Direct Blower System for 2 Tire Grinding & Repair Stations BUF

Company Name: The Goodyear Tire & Rubber Company Source Address: 12624 S Northgate Dr, Haubstadt, Indiana 47639 Permit Number: 051-47201-00047 Reviewer: Tessa Dedek

#### **PTE Calculation**

	Combined	2023	Amount of		
	Maximum	Actual	Rubber	Emission	Uncontrolled
	Throughput <sup>1</sup>	Throughput <sup>1</sup>	Ground Off <sup>1</sup>	Factor <sup>3</sup>	PTE of PM
Emission Unit	(tire/hr)	(tire/yr)	(lb rubber/tire)	(lb/lb rubber)	(lb/yr)
Tire Grinding & Repair Stations BUF	50	45,548	14.05	0.545	348,934

#### Annual Savings Due to Baghouse

					Total	Total
		Amount of		Product	Annual Cost	Annual
	Control	Product	Product	Recovery	of Recovery	Savings Due
	Efficiency <sup>4</sup>	Recovered	Value⁵	Value	Equipment	to Baghouse
Emission Unit	(%)	(lb/yr)	(\$/lb)	(\$/yr)	(\$/yr)	(\$/yr)
Tire Grinding & Repair Stations BUF	99.5%	347,189	\$0.04	\$13,888	\$4,138	\$9,750

#### **Capital Costs**

- Direct Blower System <sup>1</sup>	\$20,000
Total Capital Costs, P <sup>1</sup> :	\$20,000
Lifetime of Equipment, N <sup>6</sup> :	10 yr
Interest Rate, i <sup>6</sup> :	7%
Annualized Capital Costs, A:	\$2,848/yr

#### Annual Costs<sup>7</sup>

- Electrical Costs	\$540/yr
- \$0.27/hr, 8 hr/day, 5 day/wk, 50 wk/yr	
- Maintenance Costs	
<ul> <li>Electric motors (3 electric motors per lifetime of equipment, \$2,200 per motor)</li> </ul>	\$660/yr
<ul> <li>Drive belts (3 drive belts per lifetime of equipment, \$100 per belt)</li> </ul>	\$30/yr
- Hoses (3 hoses per lifetime of equipment, \$200 per hose)	\$60/yr
Total Annual Costs:	\$1,290/yr

#### Notes:

<sup>1</sup>The 2023 actual throughput and the overall cost of the direct blower system were provided by the source via email on April 11, 2024.

<sup>2</sup>The amount of rubber ground off per tire was provided by the source via email on January 15, 2024.

<sup>3</sup>The emission factor is from AP-42, Ch. 4.12, Table 4.12-3 for carcass grinding (SCC 3-08-001-52).

<sup>4</sup>The control efficiency was received from the source via email on January 15, 2024.

<sup>5</sup>The product value was received from the source via email on April 30, 2024. The source sells the recovered rubber to a recycler.

<sup>6</sup>The lifetime of equipment, N, and the interest rate, i, are conservative estimates.

<sup>7</sup>The annual costs are conservative estimates.

#### Methodology:

athodology:	
Uncontrolled PTE of PM (lb/hr) =	Estimated Actual Throughput (tire/hr) × Amount of Rubber Ground Off (lb rubber/tire)
	× Emission Factor (lb/lb rubber)
Amount of Product Recovered (lb/hr) =	Uncontrolled PTE of PM (lb/yr) × Baghouse Control Efficiency (%)
Product Recovery Value (\$/yr) =	Amount of Product Recovered (lb/yr) × Product Value (\$/lb)
Total Annual Cost of Recovery Equipment (\$/yr) =	Annualized Capital Costs, A (\$/yr) + Total Annual Costs (\$/yr)
Total Annual Savings Due to Baghouse (\$/yr) =	Total Annual Cost of Recovery Equipment (\$/yr) - Product Recovery Value (\$/yr)
Annualized Capital Costs, A (\$/yr) =	Total Capital Costs, P (\$) × [Interest Rate, i (%)
	× [1 + Interest Rate, i (%)] ^ Lifetime of Equipment, N (yr)]
	÷ [[[1 + Interest Rate, i (%)] ^ Lifetime of Equipment, N (yr)] - 1]
Electrical Costs (\$/yr) =	0.27 (\$/hr) × 8 (hr/day) × 5 (day/wk) × 50 (wk/yr)
Electric Motors Maintenance Costs (\$/yr) =	3 (motor) × 2,200 (\$/motor) ÷ Lifetime of Equipment, N (yr)
Drive Belts Maintenance Costs (\$/yr) =	3 (belts) × 100 (\$/belts) ÷ Lifetime of Equipment, N (yr)
Hoses Maintenance Costs (\$/yr) =	3 (hose) × 200 (\$/hose) ÷ Lifetime of Equipment, N (yr)

#### Appendix A: Emission Calculations Tire Grinding & Repair Stations BUF

Company Name:The Goodyear Tire & Rubber CompanySource Address:12624 S Northgate Dr, Haubstadt, Indiana 47639Permit Number:051-47201-00047Reviewer:Tessa Dedek

#### **Process Information**

			Amount of
		Maximum	Rubber Ground
		Throughput	Off Per Tire <sup>1</sup>
Emission Unit	Quantity	(tire/hr)	(lb rubber/tire)
Tire Grinding & Repair Stations BUF	2	25	14.05

#### **Emission Factors and Uncontrolled PTE**

			1,3-		4-Methyl-2-			Lead	Remaining	Total
	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	VOC	Butadiene	Aniline	Pentanone	Hexane	Isooctane	Compounds	HAPs	HAPs
Emission Factor <sup>2</sup> (lb/lb rubber):	0.55	5.21E-04	2.65E-05	1.97E-05	1.92E-05	1.60E-05	1.09E-05	2.02E-06	4.89E-05	1.43E-04
Uncontrolled PTE (tpy):	1,677.71	1.60	0.08	0.06	0.06	0.05	0.03	6.23E-03	0.15	0.44

#### **Controlled PTE**

		Controlled
	Control	PTE of
	Efficiency	PM/PM <sub>10</sub> /PM <sub>2.5</sub> <sup>3</sup>
Emission Unit	(%)	(tpy)
Tire Grinding & Repair Stations BUF	99.5%	8.39

#### Notes:

<sup>1</sup>The amount of rubber ground off per tire was received from the source via email on January 15, 2024.

<sup>2</sup>The emission factors are from AP-42, Ch. 4.12, Table 4.12-3 for carcass grinding (SCC 3-08-001-52).

The five highest HAPs emission factors, lead compounds, and the sum of the remaining HAPs emission factors are provided above.

<sup>3</sup>IDEM, OAQ, has determined that the direct blower system should be considered an integral part of the two tire grinding and repair stations BUF.

Therefore, the potential to emit PM, PM<sub>10</sub>, and PM<sub>2.5</sub> from the two tire grinding and repair stations BUF were calculated after the direct blower

system for purposes of determining permitting level and applicability of 326 IAC 2 2 and 326 IAC 6 3.

#### Methodology:

Uncontrolled PTE (tpy) = Quantity × Maximum Throughput (tire/hr) × Amount of Rubber Ground Off (lb rubber/tire) × Emission Factor (lb/lb rubber) Controlled PTE of  $PM/PM_{10}/PM_{2.5}$  (tpy) = Uncontrolled PTE of  $PM/PM_{10}/PM_{2.5}$  (tpy) × [1 - Control Efficiency (%)]

## Appendix A: Emission Calculations Tire Dissolution Application & Repair Operation REP

Company Name:	The Goodyear Tire & Rubber Company
Source Address:	12624 S Northgate Dr, Haubstadt, Indiana 47639
Permit Number:	051-47201-00047
Reviewer:	Tessa Dedek

## **VOCs From Rubber Solution Application & Repair**

	219000 retread tires/yr
х	25 grams/tire dissolution (based on process studies)
х	454 grams/lb
х	88.5% VOC content as heptane (88-88.5% VOC)
/	2000 lbs/ton
=	5.336 ton/yr VOCs

## Notes:

<sup>1</sup>This calculation is from the TSD Appendix A of Registration Notice-Only Change No. 051-29138-00047, issued May 3, 2010.

## Appendix A: Emission Calculations Tire Extruding/Building Machines TB

Company Name:The Goodyear Tire & Rubber CompanySource Address:12624 S Northgate Dr, Haubstadt, Indiana 47639Permit Number:051-47201-00047Reviewer:Tessa Dedek

## VOCs From Extruding Pre-cure Tread Building

219000 retread tires/yr x 3.3 lbs x 1.23E-05 lb VOCs/lb rubber (AP42 Section 4.12 Extruder Emission Factors) / 2000 lbs/ton 0.00445 tons/yr VOCs

#### Notes:

<sup>1</sup>This calculation is from the TSD Appendix A of Registration Notice-Only Change No. 051-29138-00047, issued May 3, 2010.

#### Particulate & HAPs Emission Factors & Uncontrolled PTE

		Methylene			4-Methyl-2-		Remaining	Total
	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	Chloride	Toluene	Acetophenone	Pentanone	Hexane	HAPs	HAPs
Emission Factor <sup>1</sup> (lb/lb rubber):	3.11E-08	1.32E-05	9.26E-06	8.18E-06	5.54E-06	2.49E-06	1.31E-05	5.18E-05
Uncontrolled PTE (tpy):	1.13E-05	4.77E-03	3.35E-03	2.96E-03	2.01E-03	9.03E-04	4.75E-03	1.87E-02

#### Notes:

<sup>1</sup>The emission factors are from AP-42, Ch. 4.12, Table 4.12-3 for extrude (SCC 3-08-001-12).

Multiple rubber compounds were listed on the 'Extrude - 30800112' tab of the emission factor spreadsheet.

The maximum value for each pollutant was used as the emission factor above.

The five highest HAPs emission factors and the sum of the remaining HAPs emission factors are provided above.

#### Methodology:

Uncontrolled PTE (tpy) = 219,000 (tire/yr) × 3.3 (lb/tire) × Emission Factor (lb/lb rubber) ÷ 2,000 (lb/ton)

## Appendix A: Emission Calculations Tire Curing Chambers CUR1 & CUR2

Company Name:The Goodyear Tire & Rubber CompanySource Address:12624 S Northgate Dr, Haubstadt, Indiana 47639Permit Number:051-47201-00047Reviewer:Tessa Dedek

#### **Process Information**

		Weight of
	Maximum	Uncured
	Throughput <sup>1</sup>	Rubber <sup>2</sup>
Emission Unit	(tire/hr)	(lb rubber/tire)
Tire Curing Chambers CUR1	25	3.50

## **Emission Factors and Uncontrolled PTE**

		m-Xylene +			4-Methyl-2-	Carbon	Remaining	Total
	VOC	p-Xylene	Toluene	Ethylbenzene	Pentanone	Disulfide	HAPs	HAPs
Emission Factor <sup>3</sup> (lb/lb rubber):	3.10E-04	3.36E-05	1.65E-05	1.35E-05	1.32E-05	1.32E-05	2.99E-05	1.20E-04
Tire Curing Chambers CUR1	0.12	0.01	0.01	0.01	0.01	0.01	0.01	0.05
Tire Curing Chambers CUR2	0.12	0.01	0.01	0.01	0.01	0.01	0.01	0.05
Total Uncontrolled PTE (tpy):	0.24	0.03	0.01	0.01	0.01	0.01	0.02	0.09

## Notes:

<sup>1</sup>The maximum throughput for CUR2 is 26 tire/hr, but it is bottlenecked by the other processes at the source.

<sup>2</sup>The weight of uncured rubber per tire was received from the source via email on November 21, 2023.

<sup>3</sup>The emission factors are from AP-42, Ch. 4.12, Table 4.12-3 for tire cure (SCC 3-08-001-07).

Multiple rubber compounds were listed on the 'Tire Cur - 30800107' tab of the emission factor spreadsheet.

The maximum value for each pollutant was used as the emission factor above.

The five highest HAPs emission factors and the sum of the remaining HAPs emission factors are provided above.

## Methodology:

Uncontrolled PTE (tpy) = Quantity × Maximum Throughput (tire/hr) × Amount of Rubber Ground Off (lb rubber/tire) × Emission Factor (lb/lb rubber) × 8,760 (hr/yr) ÷ 2,000 (lb/ton)

#### Appendix A: Emission Calculations Fugitive Dust Emissions - Paved Roads

Company Name: The Goodyear Tire & Rubber Company Source Address: 12624 S Northgate Dr, Haubstadt, Indiana 47639 Permit Number: 051-47201-00047 Reviewer: Tessa Dedek

#### Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Informtation (provided by source)

· · · · · · · · · · · · · · · · · · ·	Maximum	Number of	Maximum	Maximum	Total Weight				
	Number of	One-Way	Trips	Weight of	Driven				
	Vehicles	Trips Per Day	Per Day	Loaded Vehicle	Per Day	M	aximum One	e-Way Distar	nce
Туре	Per Day	Per Vehicle	(trip/day)	(ton/trip)	(ton/day)	(ft/trip)	(mile/trip)	(mile/day)	(mile/yr)
Vehicle Entering Plant (One-Way Trip)	1.0	1.0	1.0	54.0	54.0	1,548	0.293	0.3	107.0
Vehicle Leaving Plant (One-Way Trip)	1.0	1.0	1.0	58.0	58.0	1,548	0.293	0.3	107.0
		Total:	2.0		112.0			0.6	214.0

 Average Vehicle Weight Per Trip =
 56.0
 ton/trip

 Average Miles Per Trip =
 0.29
 mile/trip

Unmitigated Emission Factor, Ef = k × sL ^ 0.91 × W ^ 1.02] (Equation 1 from AP-42 13.2.1)

	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42, Ch. 13.2.1, Table 13.2.1-1)
W =	56.0	56.0	56.0	ton = average vehicle weight
sL =	9.7	9.7	9.7	g/m <sup>2</sup> = silt loading value for paved roads at iron & steel production facilities
				(AP-42, Ch. 13.2.1, Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Ef × [1 - (p + 4N)] (Equation 2 from AP-42 13.2.1) Mitigated Emission Factor, Eext = Ef × [1 - (p + 4N)]

where p =	125	days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N =	365	days per year

	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	
Unmitigated Emission Factor, Ef =	5.278	1.056	0.2591	lb/mile
Mitigated Emission Factor, Eext =	4.827	0.965	0.2369	lb/mile

	Mitigated PTE Before Control (tpy)				
Process	PM	PM <sub>10</sub>	PM <sub>2.5</sub>		
Vehicle Entering Plant (One-Way Trip)	0.26	0.05	0.01		
Vehicle Leaving Plant (One-Way Trip)	0.26	0.05	0.01		
Total:	0.52	0.10	0.03		

#### Methodology:

Maximum Trips Per Day (trip/day) =Maximum Number of Vehicles Per Day (vehicle/day) × Number of One-Way Trips Per Day Per Vehicle (trip/day/vehicle)Total Weight Driven Per Day (ton/day) =Maximum Trips Per Day (trip/day) × Maximum Weight of Loaded Vehicle (ton/trip)Maximum One-Way Distance (mile/trip) =Maximum One-Way Distance (fl/trip) + 5,280 (fl/mile)Maximum One-Way Distance (mile/trip) =Maximum One-Way Distance (mile/trip) × Maximum Trips Per Day (trip/day)Maximum One-Way Distance (mile/trip) =Maximum One-Way Distance (mile/trip) × 365 (day/yr)Average Vehicle Weight Per Trip (ton/trip) =Maximum One-Way Distance (mile/trip) × 365 (day/yr)Average Miles Per Trip (ton/trip) =Maximum One-Way Distance (mile/trip) × Maximum Trips Per Day (trip/day)Average Miles Per Trip (ton/trip) =Maximum One-Way Distance (mile/trip) × Maximum Trips Per Day (trip/day)Unmitigated Emission Factor, Ef (lb/mile) =Particle Size Multiplier, k (lb/VMT) × [Silt Loading Value (g/m^2) ^ 0.91] × [Average Vehicle Weight Per Trip, W (ton/trip) ^ 1.Mitigated PTE Before Control (tpy) =Maximum One-Way Distance (mile/yr) × Mitigated Emission Factor, Eext (lb/mile) =



We Protect Hoosiers and Our Environment.

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Eric J. Holcomb Governor Brian C. Rockensuess Commissioner

## SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

- TO: Michael Phelps The Goodyear Tire & Rubber Company 12624 S Northgate Dr Haubstadt, IN 47639
- DATE: June 25, 2024
- FROM: Jenny Acker, Branch Chief Permits Branch Office of Air Quality
- SUBJECT: Final Decision Registration AA 051-47201-00047

This notice is to inform you that a final decision has been issued for the air permit application referenced above.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. In addition, the Notice of Decision has been sent to the OAQ Permits Branch Interested Parties List and, if applicable, the Consultant/Agent and/or Responsible Official/Authorized Individual.

**The final decision and supporting materials are available electronically**; the original signature page is enclosed for your convenience. The final decision and supporting materials available electronically at:

**IDEM's online searchable database:** <u>http://www.in.gov/apps/idem/caats/</u>. Choose Search Option **by Permit Number**, then enter permit 47201

#### and

**IDEM's Virtual File Cabinet (VFC):** <u>https://www.in.gov/idem</u>. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, or have difficulty accessing the documents online, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover Letter 8/20/20-acces via website





**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT** 

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Eric J. Holcomb Governor Brian C. Rockensuess Commissioner

## June 25, 2024 The Goodyear Tire & Rubber Company 051-47201-00047

To: Interested Parties

This notice is to inform you that a final decision has been issued for the air permit application referenced above. This notice is for informational purposes only. You are not required to take any action.

You are receiving this notice because you asked to be on IDEM's notification list for this company and/or county; or because your property is nearby the company being permitted; or because you represent a local/regional government entity.

The enclosed Notice of Decision Letter provides additional information about the final permit decision.

The final decision and supporting materials are available electronically at:

IDEM's online searchable database: <u>http://www.in.gov/apps/idem/caats/</u> . Choose Search Option by Permit Number, then enter permit 47201

and

IDEM's Virtual File Cabinet (VFC): <u>https://www.in.gov/idem.</u> Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit.

**Please Note:** If you would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.



# Mail Code 61-53

IDEM Staff	LGAINES 6/25/2	2024		
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2		Gibson County Health Department 203 S Prince St, Ste A Princeton IN 47670 (Health Department)									
3		Gibson County Commissioners Courthouse Annex North, 225 N Hart St Princeton IN 47670 (Local Official)									
4		Haubstadt Town Council PO Box 365 Haubstadt IN 47639 (Local Official)									
5		Mr. Mark Wilson Evansville Courier & Press PO Box 268 Evansville IN 47702-0268 (Affected Party)									
6		David Boggs 216 Western Hills Dr Mount Vernon IN 47620 (Affected Party)									
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