

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT**

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT


Cooper Tire and Rubber Company, a subsidiary of The Goodyear Tire and Rubber
Company
1804 South Green Street
Tupelo, Mississippi
Lee County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Permit Issued: January 4, 2023

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: December 31, 2027

Permit No.: 1540-00008

TABLE OF CONTENTS

SECTION 1. GENERAL CONDITIONS	3
SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES	13
SECTION 3. EMISSION LIMITATIONS & STANDARDS	20
SECTION 4. COMPLIANCE SCHEDULE.....	32
SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS	33
SECTION 6. ALTERNATIVE OPERATING SCENARIOS	47
SECTION 7. TITLE VI REQUIREMENTS	48

APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT

APPENDIX B POINT SOURCE VERSUS FUGITIVE SOURCES

OTHER IMPORTANT DOCUMENTS:

40 CFR 60, SUBPART Dc – STANDARDS OF PERFORMANCE FOR SMALL INDUSTRIAL-COMMERCIAL-INSTITUTIONAL STEAM GENERATING UNITS

40 CFR 60, SUBPART BBB – STANDARDS OF PERFORMANCE FOR THE RUBBER TIRE MANUFACTURING INDUSTRY

40 CFR 63, SUBPART XXXX- NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR RUBBER MANUFACTURING

40 CFR 63, SUBPART ZZZZ – NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR STATIONARY RECIPROCATING INTERNAL COMBUSTION ENGINES

40 CFR 63, SUBPART DDDDD – NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR MAJOR SOURCES: INDUSTRIAL, COMMERCIAL, AND INSTITUTIONAL BOILERS AND PROCESS HEATERS.

SECTION 1. GENERAL CONDITIONS

1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)

1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)

1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)

1.4 Prior to its expiration, this permit may be reopened in accordance with the provisions listed below.

(a) This permit shall be reopened and revised under any of the following circumstances:

- (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
- (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
- (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.

- (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- (c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.G.)

- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)

- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)

- 1.7 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)

- 1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.

- (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the

amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

- (c) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)

- (d) The fee shall be due September 1 of each year. By July 1 of each year, the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)

- (e) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)

- 1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)

- 1.10 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)

- 1.11 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)

- 1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)

- 1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(2).)

- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)

- 1.15 Nothing in this permit shall alter or affect the following:
- (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
 - (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
 - (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)

- 1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)

- 1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

- 1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:

- (a) the changes are not modifications under any provision of Title I of the Act;
- (b) the changes do not exceed the emissions allowable under this permit;
- (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
 - (1) a brief description of the change(s),
 - (2) the date on which the change will occur,

- (3) any change in emissions, and
 - (4) any permit term or condition that is no longer applicable as a result of the change;
- (d) the permit shield shall not apply to any Section 502(b)(10) change.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)

- 1.19 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment," and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act." Modification is defined as [a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- (a) routine maintenance, repair, and replacement;
- (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) use of an alternative fuel or raw material by a stationary source which:
 - (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51, Subpart I, or 40 CFR 51.166; or

- (2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166;
- (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
- (f) any change in ownership of the stationary source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.C(15).)

1.21 Any change in ownership or operational control must be approved by the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)

1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)

1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.

- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
- (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
- (c) Burning must not occur within 500 yards of commercial airport property, private airfields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies:

- (a) Except as otherwise specified herein, an “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - (2) the permitted facility was at the time being properly operated;
 - (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)

1.25 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.

- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)

- (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
 - (i) An upset occurred and that the source can identify the cause(s) of the upset;
 - (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
 - (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
 - (3) This provision is in addition to any upset provision contained in any applicable requirement.
 - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
 - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this

regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

- (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

- 1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.8.)

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-000	Rubber Tire Manufacturing (Facility-wide) which includes all of the equipment and processes at the plant (AI 11536) that use “cements and solvents” as defined by 40 CFR Part 63.6015 of the Rubber Tire Manufacturing MACT, Subpart XXXX.
AB-000	Boiler Operations (Cooper Tire Ref. Group 12)
AB-101	99.1 MMBtu/Hr Natural Gas fired Primary Boiler, with continuous oxygen trim system, exhausting through a single stack to the atmosphere.
AB-301	96.0 MMBtu/Hr Natural Gas fired Secondary Boiler, without continuous oxygen trim system, exhausting through a single stack to the atmosphere.
AB-402	2.6 MMBtu/Hr Natural Gas fired Hot Water Boiler No. 1.
AB-403	2.6 MMBtu/Hr Natural Gas fired Hot Water Boiler No. 2.
AB-404	2.6 MMBtu/Hr Natural Gas fired Hot Water Boiler No. 3.
AC-000	Rubber Calendering Operations (Cooper Tire Ref. Group 03) – Milled and/or extruded rubber is calendered onto either rolls of fabric, strands of steel wire or rubber-to-rubber. Extruded material may be attached to the calendered material. Finished material is cooled, marked, may be pre-cured and is wound into rolls.
AC-101	Z-Calender Operation - Two (2) Z-Calender, which exhausts inside the building
AC-102	Z-Calender Operation - Five (5) Rubber Mills, which exhaust inside the building
AC-103	Z-Calender Operation - Two (2) Rubber Extruders, which exhaust inside the building
AC-201	Twin Two Calender Operations - Twin Two Calender, which exhausts inside the building
AC-202	Twin Two Calender Operations - Four (4) Rubber Mills, which exhaust inside the building
AC-203	Calender Operations - One (1) Chafer Extruder which exhausts inside the building
AD-000	Emergency Reciprocating Internal Combustion Engines
AD-101	340 hp Diesel fire pump engine (No. 1) used to operate a fire pump to supply water to the plant fire protection system in case of fire. Pump is used for emergency use only. Manufactured in 1995.
AD-102	544 hp Diesel fire pump engine (No. 2) used to operate a fire pump to supply water to the plant fire protection system in case of fire. Pump is used for emergency use only. Manufactured in 1995.
AE-000	Rubber Extrusion Operations (Cooper Tire Ref. Group 04) -- Slab rubber is extruded to form various tire components. The extruded product may be marked, and is cooled before winding into drums. Emissions are released as fugitive. Some rubber may be milled before it is extruded and some rubber is calendered and applied to extruded material.
AE-201	No. 2 White/Black Sidewall Line - Four (4) extruders, which exhaust inside the building
AE-202	No. 2 White/Black Sidewall Line - One (1) Veneer Calender, which exhausts inside the building.

Emission Point	Description
AE-203	No. 2 White/Black Sidewall Line - One (1) Rubber Mill, which exhausts inside the building
AE-204	No. 2 White/Black Sidewall Line - One (1) Ink-Jet Printer, which exhausts inside the building
AE-301	No. 3 Bead Wedge Line - One (1) extruder, which exhausts inside the building
AE-401	No. 4 Black Sidewall Line - Four (4) extruders, which exhaust inside the building
AE-402	No. 4 Black Sidewall Line - One (1) Ink-Jet Printer which exhaust inside the building
AE-501	No. 5 White/Black Sidewall Line - Four (4) extruders, which exhausts inside the building
AE-502	No. 5 White/Black Sidewall Line - One (1) Veneer Calender, which exhausts inside the building.
AE-503	No. 5 White/Black Sidewall Line - One (1) Rubber Mill, which exhausts inside the building.
AE-504	No. 5 White/Black Sidewall Line - One (1) Ink-Jet Printer, which exhausts inside the building.
AE-601	Bead Forming Operation - Six (6) Bead Formers and Thirteen (13) Bead Applicators with one (1) extruder each, which exhaust inside the building
AE-602	Bead Forming Operations - Two (2) Rubber Mills, which exhaust inside the building.
AE-701	Belt Edge Gum Strip (BEGS) Operations - Four (4) Extruders, which exhaust inside the building.
AE-801	No. 6 Triplex Sidewall Extrusion Line - Three (3) extruders, which exhaust inside the building.
AE-802	No. 6 Triplex Sidewall Extrusion Line - One (1) Veneer Calender, which exhausts inside the building.
AE-803	No. 6 Triplex Sidewall Extrusion Line - One (1) Rubber Mill, which exhausts inside the building.
AE-804	No. 6 Triplex Sidewall Extrusion Line - One (1) Ink-Jet Printer, which exhausts inside the building.
AF-000	Hand Buffing Operations (Cooper Tire Ref. Group 09) – Some of the tires produced may undergo hand buffing as part of the quality control cosmetic improvement or quality control processes. All tires will be inspected, but a relatively few will be buffed. Some tires may have the vents trimmed from the tread or side wall area.
AF-101	Tire Cleaning Station equipped with a cyclone for emission control, which exhausts inside the building.
AF-102	Quality Control Cage Activities equipped with a cyclone for emission control, which exhausts inside the building.
AF-103	Easy-Save Repair, equipped with a cyclone for emission control, which exhausts inside the building.
AF-104	Tire Vent Trimming, which exhaust inside the building.
AG-000	Tire Uniformity Grinding Operations (Cooper Tire Ref. Group 07) – Some of the tires produced may undergo uniformity grinding which removes small amounts of rubber from the shoulder and/or center of the tire by inflating the tire and applying a grinding wheel while rotating the tire. All tires pass through the grinders for evaluation, but only a small percentage are ground.

Emission Point	Description
AG-101	The No. 1 Tire Uniformity Grinder equipped with cyclone for emission control, which exhausts inside the building.
AG-102	The No. 2 Tire Uniformity Grinder equipped with cyclone for emission control, which exhausts inside the building.
AG-103	The No. 3 Tire Uniformity Grinder equipped with a cyclone for emission control, which exhausts inside the building.
AG-104	The No. 4 Tire Uniformity Grinder equipped with a cyclone for emission control, which exhausts inside the building.
AG-105	The No. 5 Tire Uniformity Grinder equipped with a cyclone for emission control, which exhausts inside the building.
AG-106	The No. 6 Tire Uniformity Grinder equipped with cyclone for emission control, which exhausts inside the building.
AG-107	The No. 7 Tire Uniformity Grinder equipped with a cyclone for emission control, which exhausts inside the building.
AG-108	The No. 8 Tire Uniformity Grinder equipped with a cyclone for emission control, which exhausts inside the building.
AG-109	The No. 9 Tire Uniformity Grinder equipped with a cyclone for emission control, which exhausts inside the building.
AG-110	The No. 10 Tire Uniformity Grinder equipped with a cyclone for emission control, which exhausts inside the building.
AG-111	The No. 11 Tire Uniformity Grinder equipped with a cyclone for emission control, which exhausts inside the building.
AG-112	The No. 12 Tire Uniformity Grinder equipped with cyclone for emission control, which exhausts inside the building.
AG-113	The No. 13 Tire Uniformity Grinder equipped with cyclone for emission control, which exhausts inside the building.
AG-114	The No. 14 Tire Uniformity Grinder equipped with cyclone for emission control, which exhausts inside the building.
AG-115	The No. 15 Tire Uniformity Grinder equipped with a cyclone for emission control, which exhausts inside the building.
AG-116	The No. 16 Tire Uniformity Grinder equipped with a cyclone for emission control, which exhausts inside the building.
AG-117	The No. 17 Tire Uniformity Grinder equipped with cyclone for emission control, which exhausts inside the building.
AG-118	The No. 18 Tire Uniformity Grinder equipped with a cyclone for emission control, which exhausts inside the building.

Emission Point	Description
AG-119	The No. 19 Tire Uniformity Grinder equipped with a cyclone for emission control, which exhausts inside the building.
AG-120	The No. 20 Tire Uniformity Grinder equipped with a cyclone for emission control, which exhausts inside the building.
AG-121	The No. 21 Tire Uniformity Grinder equipped with a cyclone for emission control, which exhausts inside the building.
AG-122	The No. 22 Tire Uniformity Grinder equipped with a cyclone for emission control, which exhausts inside the building.
AG-123	The No. 23 Tire Uniformity Grinder equipped with a cyclone for emission control, which exhausts inside the building.
AG-124	The No. 24 Tire Uniformity Grinder equipped with a cyclone for emission control, which exhausts inside the building.
AG-125	The No. 25 Tire Uniformity Grinder equipped with a cyclone for emission control, which exhausts inside the building.
AG-126	The No. 26 Tire Uniformity Grinder equipped with a cyclone for emission control, which exhausts inside the building.
AG-127	The No. 27 Tire Uniformity Grinder equipped with a cyclone for emission control, which exhausts inside the building.
AH-000	Tire Curing Operations (Cooper Tire Ref. Group 06) – Green tires are placed into molds in steam heated curing presses until tires are cured. Bladders are prepared for presses by applying a release agent. Molds are periodically cleaned. Molds may also be lubricated.
AH-101	Steam-heated Tire Curing Presses, which exhaust inside the building.
AI-000	Miscellaneous Activities (Cooper Tire Ref. Group 13) – Tire Assembly – Small amounts of solvent may be used to freshen the tread splice during tire building. Identification marking, inks or paints, may be applied by a variety of methods to place identifying marks on tired or tire components. Equipment is cleaned by washing or wiping. Rubber detackifiers may be applied to rubber by dipping, flooding or wiping to prevent it from sticking to itself.
AI-101	Tire Assembly Operations, Includes the use of cements and solvents as defined by 40 CFR 63.6015 of the NESHAP for Rubber Tire Manufacturing, which exhaust inside the building.
AI-102	Identification Marking Activities, Includes all the insignificant activities that exhaust inside the building such as: Calender Material Marking; Extruded Component Marking; Tire Bead Painting; Tire Highpoint Marking, and other related activities that include the use of cements and solvents as defined by 40 CFR 63.6015 of the NESHAP for Rubber Tire Manufacturing. All of these sources vent within the a building and were formerly identified as insignificant activities.
AI-103	Rubber Detackifying Activities, Includes all the insignificant activities that exhaust inside the building such as the Bladder Lube Application and Slap Dip Mixing (equipped with a baghouse for emission control), and includes the use of cements and solvents as defined by 40 CFR 63.6015 of the NESHAP for Rubber Tire Manufacturing.

Emission Point	Description
AI-104	Process Equipment Cleaning
AI-105	Mobile Vacuum Equipment – 100 hp Diesel powered industrial vacuum used to facilitate cleaning tasks around the facility
AM-000	Mixing Operations (Cooper Tire Ref. Group 01) – Raw materials are weighted, charged to mixers, mixed and milled or extruded into a sheet. Emissions are released from the charge and drop door stacks, carbon black unload and transfer systems, carbon black day bins, automated compounding system, dry ingredient transfer system, refine mill and as fugitive emissions to the main building.
AM-101	Banbury Mixer No. 1 with internal mixer and drop mill, equipped with a baghouse for emissions control that discharges to the atmosphere
AM-102	Banbury Mixer No. 2 Charge Door with internal mixer, equipped with a baghouse for emissions control that discharges to the atmosphere
AM-103	Banbury Mixer No. 2 Drop Door with internal mixer and drop mill, equipped with a baghouse for emissions control that discharges to the atmosphere
AM-104	Banbury Mixer No. 3 Charge Door with internal mixer, equipped with a baghouse for emissions control that discharges to the atmosphere
AM-105	Banbury Mixer No. 3 Drop Door with internal mixer and extruder, equipped with a baghouse for emissions control that discharges to the atmosphere
AM-106	Banbury Mixer No. 4 Charge Door with internal mixer, equipped with a baghouse for emissions control that discharges to the atmosphere
AM-107	Banbury Mixer No. 4 Drop Door with internal mixer and extruder, equipped with a baghouse for emissions control that discharges to the atmosphere
AM-108	Banbury Mixer No. 5 with internal mixer and drop mill, equipped with a baghouse for emissions control that discharges to the atmosphere
AM-109	Banbury Mixer No. 6 Charge Door with internal mixer, equipped with a baghouse for emissions control that discharges to the atmosphere
AM-110	Banbury Mixer No. 6 Drop Door with internal mixer and extruder, equipped with a baghouse for emissions control that discharges to the atmosphere
AM-111	Banbury Mixer No. 7 Charge Door with internal mixer, equipped with a baghouse for emissions control that discharges to the atmosphere
AM-112	Banbury Mixer No. 7 Drop Door with internal mixer and sheeter, equipped with a baghouse for emissions control that discharges to the atmosphere
AM-113	Mixer #8 Charge Door with internal mixer, equipped with a baghouse for emissions control that discharges to the atmosphere
AM-114	Mixer #8 Drop Door with internal mixer and sheeter, equipped with a baghouse for emissions control that discharges to the atmosphere
AM-201	Carbon Black Unloading System, Discharges to the atmosphere, equipped with a baghouse to maintain negative pressure on the transfer system so that it functions properly for the unloading and

Emission Point	Description
	transfer of carbon black from the unloading station to the storage silos.
AM-202	Carbon Black Day bin No. 3, Discharges to the atmosphere, equipped with a baghouse to maintain negative pressure on the day bin so that carbon black does not build-up and allow different grades of carbon black to mix in the dry bin sections.
AM-203	Carbon Black Day bin No. 4, Discharges to the atmosphere, equipped with a baghouse to maintain negative pressure on the day bin so that carbon black does not build-up and allow different grades of carbon black to mix in the dry bin sections.
AM-302	Minor Ingredient Bulk Transfer System, Discharges to the atmosphere, equipped with bin vent filtration for emissions control.
AM-303	Automated Compounding System equipped with a dust collector for emissions control that discharges to the atmosphere.
AM-401	Mixing Refine Mill, which exhausts inside the building.
AP-000	White Sidewall Painting Operations (Cooper Tire Ref. Group 10) – White sidewall tires are conveyed to the white sidewall painters immediately after being ground. A protective coating/painting is applied to the white sidewall area of the tire. Coated tires may be dried with fans or heated air.
AP-101	White Sidewall Painter No. 1, which exhausts inside the building
AP-102	White Sidewall Painter No. 2, which exhausts inside the building
AR-000	Tire Inspection (Cooper Tire Ref. Group 11) – Tires are conveyed to the inspection area from the curing operations (AH-000). A small percentage of tires may undergo a cleaning process with a solvent material. The solvent evaporates after the cleaning process.
AR-101	Tire Inspection and Repair Activities that use water-base repair (cosmetic) paint and cleaning solvent, which exhaust inside the building.
AS-000	Green Tire Spray Operations (Cooper Tire Ref. 05) – Green tires are conveyed to the green tire spray booths. Inside and outside tire sprays are applied to inside and outside of the tire in the spray booth. Sprayed tires may be dried with fans or heated air.
AS-101	Green Tire Spraybooth No. 1, discharges through a stack to the atmosphere
AS-102	Green Tire Spraybooth No. 2, discharges through a stack to the atmosphere
AS-103	Green Tire Spraybooth No. 3, discharges through a stack to the atmosphere
AS-105	Green Tire Spraybooth No. 5, discharges through a stack to the atmosphere
AS-106	Green Tire Spraybooth No. 6, discharges through a stack to the atmosphere
AS-107	Green Tire Spraybooth No. 7, discharges through a stack to the atmosphere
AS-108	Green Tire Spraybooth No. 8, discharges through a stack to the atmosphere

Emission Point	Description
AT-000	Tread Production Operations (Cooper Tire Ref. Group 02) – Rubber is extruded, marked, cooled, cut, air dried, cemented, and booked. Off-spec treads are milled to slab stock for re-extrusion. Tread end cement may be applied automatically or manually.
AT-101	No. 1 10” X 6” Tread Extrusion Line with two (2) extruders, which exhaust inside the building
AT-102	No. 1 Tread End Cementer, which discharges through a stack to the atmosphere
AT-103	No. 1 Tread Marking, which exhausts inside the building
AT-201	No. 2 10” X 6” Tread Extrusion with two (2) extruders, which exhaust inside the building
AT-202	No. 2 Tread End Cementer, which discharges through a stack to the atmosphere
AT-203	No. 2 Tread Marking, which exhausts inside the building
AT-301	Tread Recycle Mill, which exhausts inside the building
AT-401	No. 3 Tri-Plex Tread Extrusion with two (2) extruders, which exhaust inside the building
AT-402	No. 3 Tread End Cementer, discharges through a stack to the atmosphere
AT-403	No. 3 Tread Marking, which exhausts inside the building
AT-404	No. 3 Tread Line – One (1) Rubber Mill, which exhausts inside the building
AT-501	No. 4 Quint Tread Extrusion Line, which exhausts inside the building
AT-502	No. 4 Quint Tread Cementer, which discharges through a stack to the atmosphere
AT-503	No. 4 Quint Tread Marking, which exhausts inside the building
AT-504	No. 4 Quint Rubber Mill, which exhausts inside the building
AT-601	No. 5 Quint Tread Extrusion Line, which exhausts inside the building
AT-602	No. 5 Quint Tread Marking, which exhausts inside the building
AT-603	No. 5 Quint Rubber Recycle Mill, which exhausts inside the building
AW-000	White Sidewall Grinding Operations (Cooper Tire Ref. Group 08) – Some of the tires produced may undergo white side wall grinding. Tires are inflated and a protective veneer of rubber is removed from the side wall of the tire by abrasive grinding heads.
AW-101 AW-102	The No. 1 and No. 2 White Sidewall Buffers equipped with a scrubber for emission control that discharges through a stack to the atmosphere.

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. Facility-Wide Emission Limitations & Standards

- 3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).
- (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
 - (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)

- 3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

- 3.A.3 For the entire facility, the permittee shall not cause, permit, or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.
- (a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.
 - (b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gasborne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.C.)

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
Facility-wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in the Title V Operating Permit issued May 1, 2007, and the Title V Operating Permit issued January 4, 2023	3.B.1	VOC	≤ 249 tons/year total from point sources for each consecutive 12-month period on a rolling basis.
	40 CFR 63.5981, Subpart XXXX – National Emissions Standards for Hazardous Air Pollutants for Rubber Manufacturing	3.B.2	HAP	Applicability
	40 CFR 63.5984, Subpart XXXX	3.B.3		For HAPs listed in Table 16 of Subpart XXXX: 2 lbs/ton of total cements and solvents used; and for HAPs not listed in Table 16 of Subpart XXXX: 20 lbs/ton of total cements and solvents used.
	40 CFR 63.5985(a) and (b), Subpart XXXX	3.B.4		Compliance Alternatives
	11 Miss. Admin. Code Pt.2, R.1.3.F(1).	3.B.5		PM (filterable only)
AS-000 (Green Tire Spray Operations)	40 CFR 60.540(a), Subpart BBB – New Source Performance Standard for Rubber Tire Manufacturing Industry	3.B.6	VOC	Applicability
	40 CFR 60.542(a)(5) and 40 CFR 60.541(a), Subpart BBB	3.B.7		≤ 0.0026 pounds (1.2 grams) of VOC per tire sprayed with an inside green tire spray; and ≤ 0.021 pounds (9.3 grams) of VOC per tire sprayed with an outside green tire, for each month.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in the Title V Permit Issued May 1, 2007	3.B. 8	Usage Restriction	Water-based green tire spray (Less than 1% by weight of VOC as sprayed)
AB-101 and AB-301 (Boilers)	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.B.9	PM (filterable only)	$E = 0.8808 * I^{-0.1667}$
AB-101, AB-301, AB-402, AB-403, and AB-404	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in the Title V Operating Permit issued January 4, 2023	3.B.10	Fuel	Natural Gas Only

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
AB-402, AB-403, AB-404, AD-101, and AD-102 (Boilers and Engines)	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.11	PM (filterable only)	0.6 lb/MMBtu
AB-101, AB-301, AB-402, AB-403, and AB-404 (Boilers)	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.B.12	SO ₂	4.8 lbs/MMBTU
AB-101 and AB-301 (Boilers)	40 CFR 60.40c(a), Subpart Dc – New Source Performance Standard for Small, Industrial-Commercial-Institutional-Steam Generating Units	3.B.13	SO ₂	Applicability
AB-101 and AB-301 (Boilers)	40 CFR 60.42(c), Subpart Dc	3.B.14	Fuel Restriction	Natural gas only.
AM-000 and AW-00 (Mixing and Grinding Operations)	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in the Title V Operating Permit issued May 1, 2007 and the Permit to Construct issued November 19, 2019	3.B.15	PM (filterable only)	The permittee shall not operate without associated control equipment.
AT-102, AT-202, AT-402, and AT-502 (Cementers)	40 CFR 60.540(a), Subpart BBB – NSPS for Rubber Tire Manufacturing Industry	3.B.6	VOC	Applicability
	40 CFR 60.542(a)(3), Subpart BBB	3.B.16	VOC	0.022 pounds (10 grams) /tire cemented per month (total allowable for each emission point)
AD-101 and AD-102 (Emergency Engines)	40 CFR Part 63.6585(a) and (b), and 63.6604(b), Subpart ZZZZ- National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	3.B.17	HAPs	Applicability
	40 CFR 63.6640(f)(1), (f)(2) and (f)(3), Subpart ZZZZ	3.B.18		Emergency Operating Requirements
	40 CFR 63.6625(f), Subpart ZZZZ and 11 Miss Admin. Code Pt. 2, R. 2.2.B(10), as established in the Title V Operating Permit issued June 18, 2012	3.B.19		Install a Non-Resettable Hour Meter

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
AB-101, AB-301, AB-402, AB-403 and AB-404 (Boilers)	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, Subpart DDDDD, 63.7485, 63.7490(a)(1) and (d), 63.7499(l), 63.7500(a)(1), and 63.7575	3.B.20	HAPs	Applicability

3.B.1 For the Entire Facility, the permittee shall not emit more than 249 tons per year of total VOC from point sources as defined in Appendix B of this permit, determined monthly for each consecutive 12-month period on a rolling basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Title V Operating Permit Issued May 1, 2007 and Title V Operating Permit Issued January 4, 2023)

3.B.2 For Entire Facility, the permittee is subject to and shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Rubber Tire Manufacturing, 40 CFR 63, Subpart XXXX and the General Provisions, 40 CFR 63, Subpart A.

(Ref.: 40 CFR 63.5981, Subpart XXXX)

3.B.3 For Entire Facility, the HAP emissions shall not exceed 2 lbs/ton of total cements and solvents for HAPs listed in Table 16 of 40 CFR 63, Subpart XXXX, and the HAP emissions shall not exceed 20 lbs/ton of total cements and solvents for HAPs not listed in Table 16 of 40 CFR 63, Subpart XXXX.

(Ref.: 40 CFR 63.5984 and Table 1, Subpart XXXX)

3.B.4 For Entire Facility, the permittee may use the following alternatives for meeting the emission limits in 40 CFR 63.5984 (Condition 3.B.3):

(a) *Purchase alternative:* Use only cements and solvents that, as purchased, contain no more HAP than allowed by the emission limits in Table 1, option 1 (HAP constituent option) of 40 CFR 63, Subpart XXXX.

(b) *Monthly average alternative, without using an add-on control device:* Use cements and solvents in such a way that the monthly average HAP emissions do not exceed the emission limits in Condition 3.B.3.

(Ref.: 40 CFR 63.5985(a) and (b), Subpart XXXX)

3.B.5 For Entire Facility, the permittee shall not cause, permit, or allow the emission of particulate matter (filterable only) in total quantities in any one hour from any

manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship:

$$E = 4.1 p^{0.67}$$

where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour.

Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond property boundary where the discharge occurs.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).)

- 3.B.6 For Emission Point AS-000 (*Green Tire Spray Operations*) as well as AT-102, AT-202, AT-402 and AT-502 (*Cementers*), the permittee is subject to 40 CFR 60, Subpart BBB – New Source Performance Standards for the Rubber Tire Manufacturing Industry, 40 CFR 60 Subpart BBB and 40 CFR 60, Subpart A – General Provisions.

(Ref.: 40 CFR 60.540(a), Subpart BBB)

- 3.B.7 For Emission Point AS-000 (*Green Tire Spray Operations*), the permittee shall not exceed 0.0026 pounds (1.2 grams) of VOC per tire sprayed with an inside green tire spray for each month and shall not exceed 0.021 pounds (9.3 grams) of VOC per tire sprayed with an outside green tire spray for each month. Additionally, the permittee shall only use water-based green tire spray.

(Ref.: 40 CFR 60.542(a)(5) and 40 CFR 60.541(a), Subpart BBB)

- 3.B.8 For Emission Point AS-000 (*Green Tire Spray Operations*), the permittee shall be limited to green tire sprays with the VOC content of less than 1.0% for all inside and outside sprays.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Permit Issued May 1, 2007)

- 3.B.9 For Emission Points AB-101 and AB-301 (*Boilers*), the particulate matter (filterable only) emissions shall not exceed the rate as determined by the relationship:

$$E = 0.8808 * I^{-0.1667}$$

where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).)

3.B.10 For Emission Points AB-101, AB-301, AB-402, AB-403, and AB-404 , the permittee shall combust natural gas only.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Title V Operating Permit issued January 4, 2023)

3.B.11 For Emission Points AB-402, AB-403, AB-404, AD-101, and AD-102 (*Boilers and Engines*), the particulate matter (filterable only) emissions shall not exceed 0.6 pounds per million BTU per hour heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)

3.B.12 For Emission Points AB-101, AB-301, AB-402, AB-403, and AB-404 (*Boilers*), the maximum discharge of sulfur dioxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

(Ref.: 11 Miss. Admin. Code Pt 2, R. 1.3.A(1).)

3.B.13 For Emission Points AB-101 and AB-301 (*Boilers*), the permittee is subject to 40 CFR 60, Subpart Dc – New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, and shall comply with the applicable provisions of 40 CFR 60.40c.

(Ref.: 40 CFR 60.40c(a), Subpart Dc)

3.B.14 For Emission Points AB-101 and AB-301 (*Boilers*), the permittee shall restrict fuels to natural gas.

(Ref.: 40 CFR 60.42(c), Subpart Dc)

3.B.15 For Emission Points AM-000 and AW-000 (*Mixing and Grinding Operations*), the permittee shall not operate without the associated control equipment. Should the control technologies become nonoperational then the respective process shall be shut down immediately, but not as to cause damage to equipment or property or cause further environmental problems. The process shall not startup until such time that the control technology becomes operational. The permittee shall maintain on hand at all times sufficient equipment as is necessary to repair and/or overhaul each control device at all times. The permittee shall maintain and perform quality assurance/quality control measures in accordance with the manufacture's specifications.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit Issued May 1, 2007, and the Permit to Construct issued November 19, 2019)

3.B.16 For Emission Point AT-102, AT-202, AT-402, and AT-502, (*Cementers*), the tread end cementing operations, the permittee is subject to the New Source Performance Standards for the Rubber Tire Manufacturing Industry, 40 CFR 60 Subpart BBB and the General

Provisions in 40 CFR 60 Subpart A. The permittee shall not exceed ≤ 0.022 pounds (10 grams) of VOC per tire cemented for each month (total allowable for each emission point).

(Ref.: 40 CFR Part 60.542 (a)(3), Subpart BBB)

- 3.B.17 For Emission Point AD-101 and AD-102 (*Emergency Engines*), the permittee is subject to and shall comply with National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines and General Provisions. •

Emission Point AD-102 is an existing 544 brake horse power (bhp) diesel-fired RICE fire pump engine used as an emergency generator with a site rating of more than 500 (bhp) that commenced construction prior to December 19, 2002.

Emission Point AD-101 is an existing 340 brake horse power (bhp) diesel-fired fire pump engine that commenced construction of the units commenced prior to June 12, 2006

(Ref.: 40 CFR 63.6585 and 63.6604(b), and 63.6604(b), Subpart ZZZZ)

- 3.B.18 For Emission Point AD-101 and AD-102 (*Emergency Engines*), any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year as described in (c) below, is prohibited. If the permittee does not operate the engine according to the requirements in (a)-(c) below, the engine will not be considered an emergency engine under Subpart ZZZZ and shall meet all requirements for non-emergency engines.

- (a) There is no time limit on the use of emergency stationary RICE in emergency situations.
- (b) The permittee may operate the engine for maintenance checks and readiness testing for a maximum of 100 hours per calendar year provided the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or insurance company associated with the engine. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating the federal, state, or local standards require maintenance testing of the engine beyond 100 hours per calendar year.
- (c) The permittee may operate the engine up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (b) of this section. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 63.6640(f)(1), (2) and (3), Subpart ZZZZ)

- 3.B.19 For Emission Points AD-101 and AD-102 (*Emergency Engines*), the permittee shall install a non-resettable hour meter if one is not already installed.

(Ref.: 40 CFR 63.6625(f), Subpart ZZZZ and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit Issued June 18, 2012)

3.B.20 For Emission Points AB-101, AB-301, AB-402, AB-403, and AB-404 (*Boilers*), the permittee is subject to and shall comply with the applicable provisions of 40 CFR 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.

For the purposes of determining applicability with this Subpart, these boilers are considered existing units in the “units designed to burn gas 1 fuel“ subcategory as listed in 40 CFR 63.7499(l) and defined in 40 CFR 63.7575, and, as such, are only required to comply with the work practice standard in Condition 3.D.3.

(Ref: 40 CFR 63.7485, 63.7490(a)(1) and (d), 63.7499(l), 63.7500(a)(1), and 63.7575), Subpart DDDDD)

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM (filterable only)	0.6 lbs/MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	SO ₂	4.8 lbs/MMBTU

3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)

3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

D. Work Practice Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AD-101 (Emergency Engine)	40 CFR 63.6602 and Table 2c, Subpart ZZZZ	3.D.1	HAP	<ul style="list-style-type: none"> •Change oil and filter every 500 hours of operation or annually, whichever comes first; •Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and •Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary
AD-101 (Emergency Engine)	49 CFR 63, Subpart ZZZZ - 40 CFR 63.6605(a) and (b)	3.D.2	Good Air Pollution Control Practices	Operate and maintain the engines in a manner consistent with safety and good air pollution control practices for minimizing emissions.
AB-301 (Boilers)	40 CFR 63.7500(a)(1), 63.7500(e), 63.7505(a), 63.7515(d), 63.7540(a)(10), 63.7575, and Table 3, Subpart DDDDD	3.D.3	HAP	Conduct a tune-up annually
AB-101, AB-402, AB-403, and AB-404 (Boilers)	40 CFR 63.7500(a)(1), 63.7500(e), 63.7515(d), 63.7540(a)(12), 63.7575, and Table 3, Subpart DDDDD			Conduct a tune-up once every 5 years
AB-301, AB-101, AB-402, AB-403, and AB-404 (Boilers)	40 CFR 63.7500(a)(3), Subpart DDDDD	3.D.4	Good Air Pollution Control Practices	Operate and maintain in a manner consistent with safety and good air pollution control practices for minimizing emissions.
	40 CFR 63.7500(f) and 63.7505(a), Subpart DDDDD	3.D.5	HAP	Standards apply at all times except during startup and shutdown.

3.D.1 For Emission Point AD-101 (*Emergency Engine*), the permittee shall comply with the following requirements:

- (a) Change oil and filter every 500 hours of operation or annually, whichever comes first.
- (b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;
- (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule above, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the work practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

The permittee has the option to utilize an oil analysis program as described in 40 CFR 63.6625(i) in order to extend the specified oil change requirement above.

(Ref.: 40 CFR 63.6602 and Table 2c, Subpart ZZZZ)

3.D.2 For Emission Point AD-101 (*Emergency Engine*), the permittee shall, at all times, be in compliance with the applicable requirements of Subpart ZZZZ and shall operate and maintain the engine in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by Subpart ZZZZ have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the MDEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 40.63.6605(a) and (b), Subpart ZZZZ)

3.D.3 For Emission Points AB-101, AB-301, AB-402, AB-403, and AB-404 (*Boilers*), the permittee shall meet the applicable work practice standards in Table 3 of Subpart DDDDD, which include annual tune-ups for Emission Point AB-301, and tune-ups every five years for Emission Points AB-101, AB-402, AB-403, and 404. The tune-ups shall be conducted according to the following

(Ref.: 40 CFR 63.7500(a)(1), 63.7500(e), 63.7515(d), 63.7540(a)(12), 63.7575, and Table 3, Subpart DDDDD)

3.D.4 For Emission Points AB-101, AB-301, AB-402, AB-403, and AB-404 (*Boilers*), the permittee shall at all times operate and maintain any affected source in a manner consistent with safety and good air pollution control practices for minimizing emissions.

(Ref.: 40 CFR 63.7500(a)(3), Subpart DDDDD)

3.D.5 For Emission Points AB-101, AB-301, AB-402, AB-403, and AB-404 (*Boilers*), the permittee shall be in compliance at all times the affected unit is operating except during periods of startup and shutdown in which the requirements in Table 3 of 40 CFR 63, Subpart DDDDD apply.

(Ref.: 40 CFR 63.7500(f), and 63.7505(a), Subpart DDDDD)

SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
- (a) the identification of each term or condition of the permit that is the basis of the certification;
 - (b) the compliance status;
 - (c) whether compliance was continuous or intermittent;
 - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
 - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:

- (a) the date, place as defined in the permit, and time of sampling or measurements;
- (b) the date(s) analyses were performed;
- (c) the company or entity that performed the analyses;
- (d) the analytical techniques or methods used;
- (e) the results of such analyses; and
- (f) the operating conditions existing at the time of sampling or measurement.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)

5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).)

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E. For applicable periodic reporting requirements in 40 CFR Parts 60, 61, and 63, the permittee shall comply with the deadlines in this condition for reporting conducted on a semiannual basis. Additionally, any required quarterly reports shall be submitted by the end of the month following each calendar quarter (i.e., April

30th, July 31st, October 31st, and January 31st), and any required annual reports shall be submitted by January 31st following each calendar year.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1)., 40 CFR 60.19(c), 61.10(g), and 63.10(a)(5))

5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(2).)

5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

5.A.8 Unless otherwise specified in Section 4, upon permit issuance, the monitoring, testing, recordkeeping, and reporting requirements of Section 5 herein supersede the requirements of any preceding permit to construct and/or operate.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AA-000 (Facility Wide)	11 Miss. Admin. Code Pt. 2, R 6.3.A.(3)(a)(2).	5.B.1	VOC	Monthly Recordkeeping
	40 CFR 63.6003(a), 63.6011(b) and Table 9, Subpart XXXX	5.B.2	HAP	Continuous Compliance Demonstration
	40 CFR 63.6004 and Table 10, Subpart XXXX	5.B.3		
AA-000 (Facility Wide)	40 CFR 63.6011(a), Subpart XXXX	5.B.4	HAP	Recordkeeping

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AM-000 and AW-000 (Mixing and Grinding Operations)	11 Miss. Admin. Code Pt. 2, R 6.3.A.(3)(a)(2).	5.B.5	Opacity	Visible Emissions, Weekly Baghouse Inspections and Maintenance
AS-000, AT-102, AT-202, AT-402, and AT-502 (Green Tire Spray and Cementers)	40 CFR 60.543(b)(4), 60.545(f), and 60.546(j), Subpart BBB	5.B.6	VOC	Formulation Data
AT-102, AT-202, AT-402, and AT-502 (Cementers)	40 CFR 60.543(d), Subpart BBB	5.B.7	VOC	Compliance Demonstration
AB-101 and AB-301 (Boilers)	40 CFR 60.42c(h) and (e), Subpart Dc	5.B.8	Fuel Restriction	Recordkeeping
AD-101 (Emergency Engine)	40 CFR 63.6625(e), 40 CFR 63.6640(a) and Table 6, Subpart ZZZZ	5.B.9	HAP	Operate and maintain the engine according to the manufacturer's emission-related written instructions or develop and follow a maintenance plan
	40 CFR 63.6625(h), Subpart ZZZZ	5.B.10		Minimize the engines time spent at idle
	40 CFR 63.6655(a), (e), and (f), Subpart ZZZZ	5.B.11		Maintain records of notification and reports submitted, maintenance performed, the occurrence and duration of malfunctions, and actions taken to minimize emissions during malfunctions.
AD-101 and AD-102 (Emergency Engines)	11 Miss. Admin. Code Pt. 2, R 6.3.A.(3)(a)(2).	5.B.12		Hours of Operation
AB-101, AB-301, AB-402,	40 CFR 63.7540(a)(10) and (13), Subpart DDDDD	5.B.13		Continuous Compliance

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AB-403 and AB-404 (Boilers)	40 CFR 63.7545(f), Subpart DDDDD	5.B.14		Natural Gas Curtailment
	40 CFR 63.7525(k), 63.7555(a)(1) and (h), 63.7560, and 63.10(b)(2), Subpart DDDDD	5.B.15		Recordkeeping

5.B.1 For Emission Point AA-000 (*Facility-wide*), the permittee shall monitor and maintain monthly production records to determine the total VOC emissions for each consecutive 12-month period on a rolling basis. The records shall include the following information:

- (a) The total amount of rubber processed on a monthly basis and for each consecutive 12-month period on a rolling basis;
- (b) Identification of the VOC-containing material used on a monthly basis and in each consecutive 12-month period on a rolling basis, including;
 - (1) The total amount of each VOC-containing material (by volume or weight) used each month.
 - (2) The total VOC contents of each VOC-containing material. A description of the methodology used to determine the VOC content.
 - (3) The density of each coating, adhesive, solvent, or other VOC containing material used, unless the material usage is measured in pounds.
- (c) Calculations to determine the monthly and rolling 12-month total VOC emissions using the records required above.

The permittee shall maintain copies of all records and reports on site in accordance with Condition 5.A.3 and shall make them available upon request by MDEQ personnel.

(Ref.: 11 Miss. Admin. Code Pt. 2, R 6.3.A.(3)(a)(2).)

5.B.2 For Emission Point AA-000 (*Facility-wide*), the permittee shall keep the following records to demonstrate continuous compliance:

- (a) If the permittee is complying with the purchase compliance alternative in §63.5985(a) to meet the HAP constituent emission limit in Table 1 (option 1) of 40 CFR 63, Subpart XXXX, the following records shall be maintained:
 - (1) A list of each cement and solvent, as purchased, that is used at the affected source during each monthly operating period and the manufacturer or supplier of each;

- (2) A record of Method 311 (40 CFR 60, Appendix A), or approved alternative method, test results, or any other reasonable means for indicating the mass percent of each HAP for each cement and solvent as purchased. Other reasonable means include, but are not limited to: material safety data sheets, certified product data sheets; or manufacturer's hazardous air pollutant data sheets.
- (b) If the permittee is complying with the monthly average compliance alternative without using a control device according to 40 CFR 63.5985(b) to meet the HAP constituent emission limit in Table 1 (option 1) of 40 CFR 63, Subpart XXXX, the following records shall be maintained:
- (1) A record of Method 311 (40 CFR 60, Appendix A), or approved alternative method, test results, or any other reasonable means for indicating the mass percent of each HAP for each cement and solvent as purchased. Other reasonable means includes, but are not limited to: material safety data sheets; certified product data sheets; or manufacturer's hazardous air pollutant data sheets.
 - (2) The mass of each cement and solvent used each monthly operating period.
 - (3) All data and calculations used to determine the monthly average mass percent for each HAP for each monthly operating period.
 - (4) Monthly averages of emissions in the appropriate emission limit format.

(Ref.: 40 CFR 63.6003(a), 63.6011(b), and Table 9, Subpart XXXX)

5.B.3 For Emission Point AA-000 (*Facility-wide*), the permittee shall comply with the following:

- (a) Demonstrate continuous compliance with each applicable limit in Table 1 of 40 CFR 63, Subpart XXXX using one of the methods specified below:
- (1) Demonstrate for each monthly period that no cements and solvents were purchased and/or used containing HAP in amounts above the composition limits in Table 1, option 1, determined according to the procedures in 40 CFR 63.5994(a) and (b)(1); or
 - (2) Demonstrate that the monthly average HAP emission for each monthly operating period does not exceed the emission limits in Table 1, option 1, determined according to the applicable procedures in 40 CFR 63.5994(a) and (b)(2).

(Ref.: 40 CFR 63.6004 and Table 10 Subpart XXXX)

5.B.4 For Emission Point AA-000 (*Facility-wide*), the permittee shall keep the following records:

- (a) A copy of each notification and report that was submitted to comply with 40 CFR 63, Subpart XXXX, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).
- (b) Records of performance tests as required in 63.10(b)(2)(viii).
- (c) The records in 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.

(Ref.: 40 CFR 63.6011(a), Subpart XXXX)

5.B.5 For Emission Points AM-000 and AW-000 (*Mixing and Grinding*), the permittee shall conduct visual observations for visible emissions from all exhaust stacks on a weekly basis and whenever there is a public complaint of visible emissions. Each visual observation shall be conducted for a minimum of six (6) consecutive minutes. Visual observations shall be conducted during daylight hours and during conditions representative of normal operation. If any visible emissions (not including condensed water vapor) are observed, the permittee shall:

- (a) Take corrective action that eliminates the visible emissions within 24 hours;
- (b) Verify that the air emissions equipment and/or any associated air pollution equipment is operating normally, in accordance with design and standard procedures, and under the same conditions in which compliance was achieved in the past; and
- (c) Perform an additional visual observation of six consecutive minutes within three (3) business days.

If the corrective action does not result in “no visible emissions” being observed from the emission point, the permittee shall notify MDEQ in writing within five (5) business days and shall have a certified visual emissions observer perform a visible emissions observation using EPA Reference Method 9 within five (5) business days of performing the initial visual observation.

The permittee shall record and maintain records documenting the following:

- (a) Identification of stack and/or Emission Point;
- (b) Results of all required visual observations, including Method 9 testing results when applicable
- (c) Description of corrective action taken and a statement of verification that the emission unit and the associated pollution control device are
- (d) operating normally; and

(d) Date and time any visible emissions were abated.

A log of these records shall be maintained in accordance with Condition 5.A.3 and a summarized report submitted in accordance with Condition 5.A.4 and made available upon request by MDEQ.

(Ref.: 11 Miss. Admin. Code Pt. 2, R 6.3.A.(3)(a)(2).)

5.B.6 For Emission Points AS-000, AT-102, AT-202, AT-402, and AT-502 (*Green Tire Spray Operation and Cementers*), in lieu of conducting a monthly performance test, the permittee shall submit formulation data or the results of Method 24 analysis annually to verify the VOC content of each tread end cement and each green tire spray material, provided the spraying formulation has not changed during the previous 12-months. If the spray material formulation changes, formulation data or Method 24 analysis of the new spray shall be conducted to determine the VOC content of the spray and reported within 30 days.

(Ref.: 40 CFR 60.543(b)(4), 60.545(f), and 60.546(j), Subpart BBB)

5.B.7 For Emission Points AT-102, AT-202, AT-402, and AT-502 (*Cementers*), or otherwise for each tread end cementing operation where water-based cements containing 1.0 percent, by weight, or VOC or more are used that do not use a VOC emission reduction system, the permittee shall use the procedure in 40 CFR 60.543(d) to determine compliance with the VOC emission per tire limit specified under 40 CFR 60.542(a)(3).

(Ref.: 40 CFR 60.543(d), Subpart BBB)

5.B.8 For Emission Point AB-101, and AB-301 (*Boilers*), the permittee shall record and maintain records of the amounts of natural gas combusted during each calendar month and the total for each consecutive 12-month period.

(Ref.: 40 CFR 60.48c(h)&(e), Subpart Dc)

5.B.9 For Emission Points AD-101 (*Emergency Engine*), the permittee shall operate and maintain the engine according to the manufacturer's emission-related written instructions or develop and follow a maintenance plan which provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution practice for minimizing emissions.

(Ref.: 40 CFR 63.6640(a) and (f)(2), 63.6625(e) and Table 6, Subpart ZZZZ)

5.B.10 For Emission Points AD-101 (*Emergency Engine*), the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

(Ref.: 40 CFR 63.6625(h), Subpart ZZZZ)

5.B.11 For Emission Points AD-101 (*Emergency Engines*), the permittee shall keep the following records:

- (a) The permittee shall keep records described in paragraphs (a)(1) through (a)(5), (b) and (c).
 - (1) A copy of each notification and report that the permittee submitted to comply with 40 CFR 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv).
 - (2) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
 - (3) Records of all required maintenance performed on the air pollution control and monitoring equipment.
 - (4) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. A copy of each report submitted to comply with 40 CFR 63, Subpart ZZZZ;
- (b) The permittee shall maintain records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE according to your own maintenance plan;

5.B.12 The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

(Ref.: 40 CFR 63.6655(a), (e), and (f), Subpart ZZZZ)

5.B.13 For Emission Points AB-101, AB-301, AB-402, AB-403, and AB-404 (*Boilers*), the permittee shall demonstrate continuous compliance with the applicable work practice standards by conducting a tune-up in accordance with Condition 3.D.3.

(Ref.: 40 CFR 63.7540(a)(10), Subpart DDDDD)

5.B.14 For Emission Points AB-101, AB-301, AB-402, AB-403, and AB-404 (*Boilers*), if the permittee burns No. 2 Fuel Oil during a period of natural gas curtailment or supply interruption, then the permittee shall submit a notification to the MDEQ of the alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption as defined by 63.7575. The notification shall include (a) through (e) below:

- (a) Company name and address.

- (b) Identification of the affected units
- (c) Reason the permittee is unable to use natural gas, including the date when the natural gas curtailment was declared or the natural gas supply interruption began.
- (d) Type of alternative fuel that the permittee intends to use.
- (e) Dates that the alternative fuel use is expected to begin and end.

(Ref.: 40 CFR 63.7545(f), Subpart DDDDD)

5.B.15 For Emission Points AB-101, AB-301, AB-402, AB-403, and AB-404 (*Boilers*), the permittee shall keep all records readily available for review. The permittee shall keep a copy each notification and report submitted to comply with Subpart DDDDD, including all documentation supporting the Notification of Compliance Status or compliance report. The permittee shall keep fuel use records of the days that the boilers were operating to maintain the limited-use category, and records of the total hours per calendar year that an alternative fuel is burned and the total hours per calendar year that the boilers operated during those times. These records shall be retained for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. The permittee is required to keep the records on site for a period of 2 years after the event and then they may be kept offsite for the remaining three years.

(Ref.: 40 CFR 63.7525(k), 63.7555(a)(1) and (h), 63.7560, and 63.10(b)(2), Subpart DDDDD)

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Reporting Requirement
AA-000 (Facility-wide)	11 Miss. Admin. Code Pt. 2, R 6.3.A.(3)(c)(1).	5.C.1	VOC	Semiannual Reports of Emissions
	40 CFR 63.6604 and Table 10, Subpart XXXX	5.C.2		
	40 CFR 63.6010(a), (c), & (d), Subpart XXXX	5.C.3	HAPs	Periodic Compliance Report Requirements
	40 CFR 63.6010(b), Subpart XXXX	5.C.4		Periodic (Semiannual and Annual) Compliance Reports
AM-000 and AW-000 (Mixing and Grinding)	11 Miss. Admin. Code Pt. 2, R 6.3.A.(3)(c)(1).	5.C.5	Opacity	Semi-annual Report of Visible Emissions Evaluations
AB-301, (Boilers)	40 CFR 63.7550(a) and Table 9, Subpart DDDDD	5.C.6	HAPs	Compliance Report due annually on January 31
AB-101, AB-402, AB-403, and AB-404 (Boilers)				Compliance Report due every 5 years beginning January 31, 2021
AB-101, AB-301, AB-402, AB-403, and AB-404 (Boilers)				40 CFR 63.7550(c), Subpart DDDDD
AD-101 (Emergency Engine)	40 CFR 63.6640(b), 63.6650(a) through (d), and Footnote 1 to Table 2c, Subpart ZZZZ	5.C.8	HAPs	Reporting Requirements
AD-101 and AD-102 (Emergency Engines)	11 Miss. Admin. Code Pt. 2, R 6.3.A.(3)(c)(1).	5.C.9	Hours of Operation	Reporting Requirements

5.C.1 For Emission Point AA-000 (Facility-wide), the permittee shall submit a semi-annual report in accordance with Condition 5.A.4 for the preceding six-month period. This report shall contain the following:

- (a) A summary of the total VOC emission rate in tons per year for each rolling 12-

month period during the reporting period. The permittee shall also include a summary of the methodology for these calculations.

- (b) At a minimum, any visible emissions detected, any corrective action undertaken, results of any Method 9 opacity observations, and any weekly inspections that were not performed.
- (c) Records of the inspections and the maintenance performed on each baghouse.

(Ref.: 11 Miss. Admin. Code Pt. 2, R 6.3.A.(3)(c)(1).)

- 5.C.2 For the Entire Facility, report each instance in which the permittee did not meet an emission limit in Table 1 of 40 CFR 63, Subpart XXXX. The permittee shall also report each instance in which they did not meet the applicable requirements in Table 10 of 40 CFR 63, Subpart XXXX. These instances are deviations from the emission limits in of 40 CFR 63, Subpart XXXX. The deviations shall be reported in accordance with the requirements in 40 CFR 63.6010(e).

If, after you submit the Notification of Compliance Status and you are complying with the purchase alternative for tire production described in 40 CFR 40 CFR 63.5985(a), the permittee uses a cement or solvent for which they have not previously verified percent HAP mass using the methods in 40 CFR 63.5994(a), the permittee shall verify that each cement and solvent used in the affected source meets the emission limit, using any of the methods in 40 CFR 63.5994(a). The permittee shall update the list of all the cements and solvents used at the affected source and with the compliance report for the reporting period during which the permittee used the new cement or solvent, the permittee shall submit the updated list of all cements and solvents and a statement certifying that, as purchased, each cement and solvent used at the affected source during the reporting period met the emission limits in table 1 of 40 CFR 63, Subpart XXXX.

The permittee shall report any exceedance of the limitations outlined in this permit to DEQ no later than ten days following the end of the month in which the exceedance occurred and shall report the cause of the exceedance and the action taken and/or to be taken to correct it.

The permittee shall submit this report in accordance with Condition 5.A.4 of this section.

(Ref.: 11 Miss. Admin. Code Pt. 2, R 6.3.A.(3)(c)(1). and 40 CFR 63.6004 and Table 10, Subpart XXXX)

- 5.C.3 For Emission Point AA-000 (*Facility-wide*), the permittee shall submit periodic compliance reports that contain the following information according to the schedule in Condition 5.C.4:

- (a) If there are no deviations from any emission limitations that apply, a statement that there were no deviations during the report period shall be submitted;
- (b) If the permittee deviated from any emission limitations during the reporting period, the notification shall contain the following information:

- (1) company name and address;
- (2) statement by responsible official, with the official's name, title, and signature, certifying the accuracy of the content of the report;
- (3) date of report and beginning and ending dates of the reporting period;
- (4) the emission limit option in 40 CFR 63.5984 and the compliance alternative in 40 CFR 63.5985 that the permittee has chosen to meet;
- (5) if the permittee chooses to comply with the purchase compliance alternative in 40 CFR 63.5985(a) and during the current reporting period a cement and solvent that, as purchased, was not included in the list submitted with the notification of compliance status of 40 CFR 63, Subpart XXXX, the report shall also include:
 - (i) an updated list of all cements and solvents used, as purchased, at the affected source, and
 - (ii) a statement certifying that each cement and solvent, as purchased, that was used at the affected source during the reporting period met the HAP constituent limits in Table 1 (option 1) of 40 CFR 63, Subpart XXXX;
- (6) the total operating time of each affected source during the reporting period;
- (7) information on the number, duration, and cause of deviations (including unknown cause, if applicable) and the corrective action taken.

(Ref.: 40 CFR 63.6010(a), (c), & (d), Subpart XXXX)

5.C.4 For Emission Point AA-000 (*Facility-wide*), the permittee shall submit the periodic compliance report outlined in Condition 5.C.3 according to the following schedule:

- (a) Each compliance report shall cover the semiannual reporting period from January 1 through June 30 or July 1 through December 31, as described in 5.A.4.
- (b) Each compliance report shall be postmarked no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
- (c) If the permittee chooses the purchase compliance alternative in 40 CFR 63.5985(a), the compliance report shall be submitted annually and cover the reporting period from January 1 through December 31. The report shall be postmarked no later than January 31.

(Ref.: 40 CFR 63.6010(b), Subpart XXXX)

5.C.5 For Emission Points AM-000 and AW-000 (*Mixing and Grinding Operations*), the permittee shall submit a report in accordance with Condition 5.A.4, summarizing the required recordkeeping and monitoring specified in Conditions 5.B.4. The report shall include, at a minimum, any visible emissions detected, any corrective action undertaken, results of any Method 9 opacity observations, and any weekly inspections that were not performed.

(Ref.: 11 Miss. Admin. Code Pt. 2, R 6.3.A.(3)(c)(1).)

5.C.6 For Emission Points AB-101, AB-301, AB-402, AB-403, and AB-404 (*Boilers*), the permittee shall submit compliance reports as required in Table 9 of Subpart DDDDD. as follows:

Emission Point AB-301 shall be submitted annually by January 31 of the following year.

Emission Points AB-101, AB-402, AB-403, and AB-404 shall be submitted by January 31, 2021, and every five years thereafter.

(Ref.: 40 CFR 63.7550(a) and Table 9, Subpart DDDDD)

5.C.7 For Emission Points AB-101, AB-301, AB-402, AB-403, and AB-404 (*Boilers*), the compliance reports required by Condition 5.C.6 shall include the following information:

- (a) Company and Facility name and address
- (b) Process unit information, emissions limitations, and operating parameter limitations.
- (c) Date of report and beginning and ending dates of the reporting period.
- (d) The total operating time during the reporting period.
- (e) Include the date of the most recent tune-up for each unit subject to only the requirement to conduct an annual, biennial, or 5-year tune-up according to 40 CFR 63.7540(a)(10), (11), or (12) respectively. Include the date of the most recent burner inspection if it was not done annually, biennially, or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown.

(Ref.: 40 CFR 63.7550(c), Subpart DDDDD)

5.C.8 For Emission Points AD-101 (*Emergency Engine*), the permittee shall report in accordance with Condition 5.A.4, each instance in which the work practices listed in Condition 3.D.1 were not met. These deviations shall be reported according to the following requirements:

- (a) If there were no deviations from any applicable emission limitations or operating limitations, a statement shall be included that there were no deviations from the emission limitations or operating limitations during the reporting period; or

- (b) If there was a deviation from any emission limitation or operating limitation during the reporting period, then the compliance report shall contain the following information:
 - (1) Company name and address.
 - (2) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
 - (3) Date of report and beginning and ending dates of the reporting period.
 - (4) The total operating time of the stationary RICE at which the deviation occurred during the reporting period.
 - (5) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- (c) If there was a malfunction during the reporting period, the compliance report shall include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report shall also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions in accordance with Condition 3.D.2, including actions taken to correct a malfunction.
- (d) If the management practices were not performed on the required schedule because it posed an unacceptable risk under Federal, State, or local law at the time of the required scheduled maintenance, the report shall include the Federal, State, or local law under which the risk was deemed unacceptable.

(Ref.: 40 CFR 63.6640(b), 63.6650(a) through (d), and Footnote 1 to Table 2c, Subpart ZZZZ)

5.C.9 For Emission Points AD-101 and AD-102, the permittee shall submit in accordance with Condition 5.A.4, records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R 6.3.A.(3)(c)(1).)

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at <http://ecfr.gpoaccess.gov> under Title 40, or DEQ shall provide a copy upon request from the permittee.

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
 - (a) All containers in which a class I or class II substance is stored or transported;
 - (b) All products containing a class I substance; and
 - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:
 - (a) Servicing, maintaining, or repairing appliances;
 - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or
 - (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations,

persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II refrigerants.

- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.
- 7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:
- (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;
 - (b) Any person disposing of halons;
 - (c) Manufacturers of halon blends; or
 - (d) Organizations that employ technicians who service halon-containing equipment.

APPENDIX A

List of Abbreviations Used In this Permit

BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR 63
NMVOC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

Point Source versus Fugitive Sources

Process Area	Description	Point Source	Control
		Boilers	Boilers are used for steam generation used in the curing process and for facility heating and reprocessing purposes. Smaller hot water boilers are also utilized at the facility.
Emergency Engines	Engines used for emergency operation. Permitted emissions include hours during tuneup and periodic maintenance.	Engines	NA
Mixing Operations	Raw material such as silica, coupling agent, carbon black, process oils, pigments, natural rubber, and synthetic rubber are mixed into the Batch mixer (Banbury), which create a homogenous mixture of raw material and produces nonproductive (no cure agents) and productive (with cure agents) rubber. Once the ingredients are mixed in a Banbury, the batch is released onto a drop device (mill, extruder, roller die, etc.), where it is formed into sheets. Emissions from rubber mixing operations consist of VOC, HAP, and PM emissions	Banbury mixers	<i>Baghouses</i>
		Mixing Refine Mill	NA
		Day bins	<i>Baghouses</i>
		Bulk Transfer System	<i>Bin Vent Filtration</i>
		Compounding System	<i>Dust Collector</i>
Rubber Extrusion Operations	Rubber strips or slabs are fed into either a mill or a cold-feed extruder at the beginning of the process line. The mills use heated rollers to increase the malleability of the rubber before it is fed to another mill or to an extruder. An extruder, also referred to as a "tuber", forms the rubber to the required size and shape.	NA	
Rubber Calendering Operations	In this process, the productive rubber from the mixing process is made into specific tire parts. These tire parts are then used in the manufacturing of green tires. The rubber from the mill or extrusion process is calendered onto either roll of fabric, strands of steel wire, or rubber to rubber.	NA	
Tread Production Operations	The tread lines form rubber into specific sizes and shapes for assembly into tires. Depending on the nature of the rubber being produced, the extruded rubber can either be wound onto a spool or cut to a specific tread length. Spools of rubber tire components are then taken to the tire assembly area to be made into tires. The rubber that is cut into treads then has cement applied to one or both ends of the tread by an automatic tread end cementing process.	Tread End Cementers	NA
Green Tire Spray Operations	Prior to Curing, green tires are conveyed to the green tire spray booths and spray inside and outside. The tires are then dried with fans or heated air.	Spray Booths	NA

Process Area	Description		
		Point Source	Control
Curing Operations	Green tires are conveyed from the tire assembly area to the curing press area. The curing press area consists of a number of presses utilizing segmented and/or two-piece molds. Bladder spray is also applied to the bladder to aid in release. Operators load the tires into the stands. Tires are picked up from the stands and mechanically loaded into the presses where the green tires are cured under high temperature and pressure. The cured tires are then ready for final finishing and inspection	NA	
Tire Inspection	Tires are conveyed to the inspection area from the curing operations. A small percentage of tires may undergo a cleaning process with a solvent material. The solvent evaporates after the cleaning process.	NA	
Uniformity Grinding Operations	As part of finishing operations, some tires may undergo uniformity grinding to remove small amounts of rubber by applying a grinding wheel to the rotating tire.	NA	
White Sidewall Grinding Operations	Some of the tires produced may undergo white side wall grinding. Tires are inflated and a protective veneer of rubber is removed from the side wall of the tire by abrasive grinding head.	Grinding Operations	<i>Scrubber</i>
White Sidewall Painting Operations	A lubricant is applied, and the tires are ground to remove the thin layer of black rubber coating the white sidewall at either of the two white sidewall grinding banks. The tires are then sprayed with white sidewall paint to protect the exposed white sidewall during shipping.	NA	
Hand Buffing Operations	As part of final finishing, some of the tires produced may undergo hand buffing as part of the quality control cosmetic improvement or quality control processes. All tires will be inspected, but a relatively few will be buffed. Some tires may have the vents trimmed from the tread or side wall area.	NA	
Miscellaneous Activities	These activities include Tire Assembly, identification Marking, Rubber Detackifying Activity, and Process Cleaning	NA	

Process Area	Description	Fugitive Sources	
		Fugitive Source	Fugitive Source Justification
Boilers	Boilers are used for steam generation used in the curing process and for facility heating and reprocessing purposes. Smaller hot water boilers are also utilized at the facility.	NA	
Emergency Engines	Engines used for emergency operation. Permitted emissions include hours during tuneup and periodic maintenance.	NA	
Mixing Operations	Raw material such as silica, coupling agent, carbon black, process oils, pigments, natural rubber, and synthetic rubber are mixed into the Batch mixer (Banbury), which create a homogenous mixture of raw material and produces nonproductive (no cure agents) and productive (with cure agents) rubber. Once the ingredients are mixed in a Banbury, the batch is released onto a drop device (mill, extruder, roller die, etc.), where it is formed into sheets. Emissions from rubber mixing operations consist of VOC, HAP, and PM emissions	NA	
Rubber Extrusion Operations	Rubber strips or slabs are fed into either a mill or a cold-feed extruder at the beginning of the process line. The mills use heated rollers to increase the malleability of the rubber before it is fed to another mill or to an extruder. An extruder, also referred to as a "tuber", forms the rubber to the required size and shape.	Extruders	<i>Rubber extrusion operations involve large equipment requiring people and materials to constantly approach the machinery that cannot be enclosed while in operation. Also, the nature of the extruding process results in the absence of a pinpointed location for emissions. Emissions may escape from any portion of the equipment during operation which prevents the emissions from being captured in a stack; therefore, these operations are deemed as fugitive.</i>
		Veneer Calender	
		Rubber Mill	
		Ink Jet Printer	
		Bead Forming Operations	

Process Area	Description	Fugitive Sources	
		Fugitive Source	Fugitive Source Justification
Rubber Calendering Operations	In this process, the productive rubber from the mixing process is made into specific tire parts. These tire parts are then used in the manufacturing of green tires. The rubber from the mill or extrusion process is calendared onto either roll of fabric, strands of steel wire, or rubber to rubber.	Calendars (Z and Twin Two)	<i>Similar to extrusion, calendaring operations involve large equipment requiring people and materials to constantly approach the machinery that cannot be enclosed while in operation. Also, the nature of the calendaring process results in the absence of a pinpointed location for emissions. Emissions may escape from any portion of the equipment during operation which prevents the emissions from being captured in a stack; therefore, these operations are deemed as fugitive.</i>
		Rubber Mills	
		Rubber Extruders	
		Chafer Extruder	
Tread Production Operations	The tread lines form rubber into specific sizes and shapes for assembly into tires. Depending on the nature of the rubber being produced, the extruded rubber can either be wound onto a spool or cut to a specific tread length. Spools of rubber tire components are then taken to the tire assembly area to be made into tires. The rubber that is cut into treads then has cement applied to one or both ends of the tread by an automatic tread end cementing process.	Extrusion Lines	<i>There are several different steps involved in tread production. During each portion of the process, previously extruded rubber needs to be assembled in an open area to be made into tires. Again, this requires people and materials constantly approaching the equipment preventing it to be enclosed and not allowing emissions to be captured; therefore, these operations are deemed as fugitive.</i>
		Tread Marking Operation	
		Rubber Mills	
		Tread Recycle Mill	
Green Tire Spray Operations	Prior to Curing, green tires are conveyed to the green tire spray booths and spray inside and outside. The tires are then dried with fans or heated air.	NA	

Process Area	Description	Fugitive Sources	
		Fugitive Source	Fugitive Source Justification
Curing Operations	Green tires are conveyed from the tire assembly area to the curing press area. The curing press area consists of a number of presses utilizing segmented and/or two-piece molds. Bladder spray is also applied to the bladder to aid in release. Operators load the tires into the stands. Tires are picked up from the stands and mechanically loaded into the presses where the green tires are cured under high temperature and pressure. The cured tires are then ready for final finishing and inspection	Curing Presses	<i>Curing operations involve equipment that requires to be constantly opened and closed while emissions are being released due to tires going in and out of the curing machinery. Emissions are released throughout this process preventing the systematic capture of those emissions in a stack; therefore, these operations are deemed as fugitive.</i>
Tire Inspection	Tires are conveyed to the inspection area from the curing operations. A small percentage of tires may undergo a cleaning process with a solvent material. The solvent evaporates after the cleaning process.	Solvent Cleaning	<i>As this operation is a manual process, it requires manual solvent use for inspection by personnel. This results in constant fugitive emissions from the tires during inspection; therefore, these operations are deemed as fugitive.</i>
Uniformity Grinding Operations	As part of finishing operations, some tires may undergo uniformity grinding to remove small amounts of rubber by applying a grinding wheel to the rotating tire.	Uniformity Grinders	<i>As this operation is part of the finishing process, it requires manual interaction with tires. This results in constant fugitive emissions from the tires during uniformity grinding; therefore, these operations are deemed as fugitive.</i>
White Sidewall Grinding Operations	Some of the tires produced may undergo white side wall grinding. Tires are inflated and a protective veneer of rubber is removed from the side wall of the tire by abrasive grinding head.	NA	
White Sidewall Painting Operations	A lubricant is applied, and the tires are ground to remove the thin layer of black rubber coating the white sidewall at either of the two white sidewall grinding banks. The tires are then sprayed with white sidewall paint to protect the exposed white sidewall during shipping.	White Sidewall Painters	<i>White Sidewall painting is an automated process that is not enclosed or routed to a stack; therefore, these operations are deemed as fugitive.</i>

Process Area	Description	Fugitive Sources	
		Fugitive Source	Fugitive Source Justification
Hand Buffing Operations	As part of final finishing, some of the tires produced may undergo hand buffing as part of the quality control cosmetic improvement or quality control processes. All tires will be inspected, but a relatively few will be buffed. Some tires may have the vents trimmed from the tread or side wall area.	Cleaning Station	<i>As this operation is part of the finishing process, it requires manual interaction with tires. This results in constant fugitive emissions from the tires during cleaning, quality control, repair, and trimming; therefore, these operations are deemed as fugitive.</i>
		QC Cage Activities	
		Easy-Save Repair Operations	
		Tire Vent Trimming	
Miscellaneous Activities	These activities include Tire Assembly, identification Marking, Rubber Detackifying Activity, and Process Cleaning	Rubber Detackifying	<i>As this operation requires constant interaction of personnel with tires and tire material, it results in constant fugitive emissions from the tires during tire assemble, marking, detackifying, and cleaning, these operations are deemed as fugitive.</i>
		Process Cleaning	
		Tire Assembly	
		ID Marking	