

Mr. Lonnie Van
Uniroyal Goodrich Tire Manufacturing
P. O. Box 277
Woodburn, Indiana 46797-0277

Re: 003-13780-00008
First Administrative Amendment to
Part 70 003-5974-00008

Dear Mr. Van:

Uniroyal Goodrich Tire Manufacturing was issued a permit on October 16, 2000 for a tire manufacturing plant. A letter requesting a change in the compliance monitoring was received on January 16, 2001. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (changes are bolded and deletions are struck-through for emphasis):

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Monitoring

- (a) The carbon black unloading has applicable compliance monitoring conditions as specified below:
- (1) No changes
 - (2) **(a) For four (4) months after the issuance of this amendment, the Permittee shall perform monthly trip checks of the fail safe pressure switches monitoring the carbon black baghouse differential pressures. The pressure switches shall cause the carbon loading to shut down if the baghouse differential is outside of the range of 6.0 to 8.0 inches of water or a range established during the latest stack test. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure switches are not operating correctly.**
- (b) After four (4) months, the monitoring required in condition (2)(a) shall be replaced permanently by the following:**
- The Permittee shall perform automatic daily monitoring and recording of the pressure differential readings on the Carbon black tank. This information shall be provided by a PLC/differential pressure transducer based system. The system shall take daily readings of the baghouse pressure drop range and shall be maintained at 6.0 to 8.0 inches of water or a range established during the latest stack test. Any readings outside of this range shall sound an alarm/alert function for immediate response by**

maintenance personnel to shut the unit down until the situation is remedied.

- (3) No changes
 - (4) No changes
 - (5) No changes
- (b) (1) No changes
- (2) (a) **For four (4) months after the issuance of this amendment, the Permittee shall perform manual monitoring and daily recording of the pressure differential readings monthly trip checks of the fail safe pressure switches monitoring on the Banbury mixing, BB dump and pellet feed for Banbury mixing baghouses. The pressure switches shall cause the carbon loading to shut down if the baghouse differential is outside of the ranges of 4.0 to 8.0, 4.0 to 8.0, and 2.0 to 8.0 inches of water or a range established during the latest stack test. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure switches are not operating correctly. Daily readings of the baghouses pressure drop ranges shall be maintained at 4.0 to 8.0, and 2.0 to 8.0 inches of water or ranges established during the latest stack test. Any readings outside of the range shall cause the unit to shut down until the situation is remedied.**
- (b) **After four (4) months, the monitoring required in condition (2)(a) shall be replaced permanently by the following:**
- The Permittee shall perform automatic daily monitoring and recording of the pressure differential readings on the Banbury mixers and dump, and Pellet feed. This information shall be provided by a PLC/differential pressure transducer based system. The system shall take daily readings of the baghouses pressure drop ranges and shall be maintained at 4.0 to 8.0, and 2.0 to 8.0 inches of water or ranges established during the latest stack test. Any readings outside of this range will sound an alarm/alert function for immediate response by maintenance personnel to shut the unit down until the situation is remedied.**

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.6 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1 and D.1.5, the Permittee shall maintain records of daily visible emission notations of the carbon black unloading, Banbury mixing, pellet spiraling for Banbury mixing, BB dump and pellet feed for Banbury mixing, WSW grinding and TUO Module Area stack exhausts.

- (b) To document compliance with Condition D.1.5, the Permittee shall maintain the following:
- (1) (a) **For four (4) months after the issuance of this amendment, m** Monthly records of trip checks of the failsafe pressure switches monitoring the carbon black baghouse differential pressure. **After the four months, daily records of the carbon black baghouse differential pressure readings.**
- (b) **For four (4) months after the issuance of this amendment, manual —**
~~— daily readings and of the Banbury mixing, BB dump and pellet feed for Banbury mixing baghouses differential pressure.~~ **After the four months, daily automatic records of the carbon black baghouse differential pressure readings.**

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

APD

cc: File - Allen County
U.S. EPA, Region V
Allen County Health Department
Air Compliance Section Inspector - Jennifer Dorn
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

Uniroyal Goodrich Tire Manufacturing US Highway 24 East Woodburn, Indiana 46797

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T003-5974-00008	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:
1 st Administrative Amendment 003-13780-00008	Pages Affected: 28, 29, 30, 31
Issued by: Paul Dubenetzky, Chief Permit Branch Office of Air Quality	

- (c) WSW grinding and TUO Module Area shall not exceed 24 pounds per hour when operating at a process weight rate of 28,378 pounds per hour.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.4 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2(c), the dust collectors, baghouses, cyclones, and dry filters for PM control shall be in operation at all times when the carbon black unloading, Banbury mixing, WSW grinding and TUO Module Area are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Monitoring

- (a) The carbon black unloading has applicable compliance monitoring conditions as specified below:
- (1) Daily visible emissions notations of the carbon black unloading stack exhausts, 356A, 356B, 356C, 356D, shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
- (2) (a) For four (4) months after the issuance of this amendment, the Permittee shall perform monthly trip checks of the fail safe pressure switches monitoring the carbon black baghouse differential pressures. The pressure switches shall cause the carbon loading to shut down if the baghouse differential is outside of the range of 6.0 to 8.0 inches of water or a range established during the latest stack test. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure switches are not operating correctly.
- (b) After four (4) months, the monitoring required in condition (2)(a) shall be replaced permanently by the following:
- The Permittee shall perform automatic daily monitoring and recording of the pressure differential readings on the Carbon black tank. This

information shall be provided by a PLC/differential pressure transducer based system. The system shall take daily readings of the baghouse pressure drop range and shall be maintained at 6.0 to 8.0 inches of water or a range established during the latest stack test. Any readings outside of this range shall sound an alarm/alert function for immediate response by maintenance personnel to shut the unit down until the situation is remedied.

- (3) An inspection shall be performed semi-annually of all bags controlling the carbon black unloading operation when venting to the atmosphere. A baghouse inspection shall be performed within six months of redirecting vents to the atmosphere and every six months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
 - (4) In the event that bag failure has been observed:
 - (A) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
 - (B) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
 - (5) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (b) The Banbury mixing, pellet spiraling for Banbury mixing, BB dump and pellet feed for Banbury mixing has applicable compliance monitoring conditions as specified below:
- (1) Daily visible emissions notations of the Banbury mixing, pellet spiraling for Banbury mixing, BB dump and pellet feed for Banbury mixing processes stack exhausts, 200, 208, 210,231, and 278 shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
 - (2) (a) For four (4) months after the issuance of this amendment, the Permittee shall perform manual monitoring and daily recording of the pressure differential readings on the Banbury mixing, BB dump and pellet feed for Banbury mixing baghouses. Daily readings of the baghouses pressure

drop ranges shall be maintained at 4.0 to 8.0, and 2.0 to 8.0 inches of water or ranges established during the latest stack test. Any readings outside of the range shall cause the unit to shut down until the situation is remedied.

- (b) After four (4) months, the monitoring required in condition (2)(a) shall be replaced permanently by the following:

The Permittee shall perform automatic daily monitoring and recording of the pressure differential readings on the Banbury mixers and dump, and Pellet feed. This information shall be provided by a PLC/differential pressure transducer based system. The system shall take daily readings of the baghouses pressure drop ranges and shall be maintained at 4.0 to 8.0, and 2.0 to 8.0 inches of water or ranges established during the latest stack test. Any readings outside of this range will sound an alarm/alert function for immediate response by maintenance personnel to shut the unit down until the situation is remedied.

- (3) An inspection shall be performed semi-annually of all bags controlling the mixing operation when venting to the atmosphere. A baghouse inspection shall be performed within six months of redirecting vents to the atmosphere and every six months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced
- (4) In the event that bag failure has been observed:
- (A) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (B) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (5) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

- (c) The WSW grinding and TUO Module Area have applicable compliance monitoring conditions as specified below:
- (1) Daily visible emissions notations of the WSW grinding and TUO Module Area and Quality assurance processes stack exhausts, 258-261, and 265-277, and 33 and 37, shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has

worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

- (2) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 and D.1.5, the Permittee shall maintain records of daily visible emission notations of the carbon black unloading, Banbury mixing, pellet spiraling for Banbury mixing, BB dump and pellet feed for Banbury mixing, WSW grinding and TUO Module Area stack exhausts.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain the following:
 - (1)
 - (a) For four (4) months after the issuance of this amendment, monthly records of trip checks of the failsafe pressure switches monitoring the carbon black baghouse differential pressure. After the four months, daily records of the carbon black baghouse differential pressure readings.
 - (b) For four (4) months after the issuance of this amendment, manual daily readings of the Banbury mixing, BB dump and pellet feed baghouse differential pressure. After the four months, daily automatic records of the carbon black baghouse differential pressure.
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

