

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date: XXX/xx/2023

Region: Winston-Salem Regional Office
County: Randolph
NC Facility ID: 7600053
Inspector's Name: Robert Barker
Date of Last Inspection: 11/09/2021
Compliance Code: 3 / Compliance - inspection

<p style="text-align: center;">Facility Data</p> <p>Applicant (Facility's Name): Oliver Rubber Company, LLC</p> <p>Facility Address: Oliver Rubber Company, LLC 408 Telephone Avenue Asheboro, NC 27205</p> <p>SIC: 3011 / Tires And Inner Tubes NAICS: 326211 / Tire Manufacturing (except Retreading)</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p style="text-align: center;">Permit Applicability (this application only)</p> <p>SIP: 15A NCAC 02D .0515, .0521, .0530, .1100, 02D .1111, .0902, 15A NCAC 02Q .0112, .0501(c)(2) NSPS: Subpart III, NESHAP: Subpart ZZZZ PSD: NA PSD Avoidance: NC Toxics: (NCGS) 143-215.107(a)(5) (House Bill 952) 112(r): NA Other: CAM</p>
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Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 7600053.20A Date Received: 12/21/2020 Application Type: Modification Application Schedule: TV-Significant</p> <p style="text-align: center;">Existing Permit Data</p> <p>Existing Permit Number: 05051/T22 Existing Permit Issue Date: 07/19/2019 Existing Permit Expiration Date: 06/30/2024</p>
Theresa Mower Raw Materials Eng./Env. Coordinator 408 Telephone Avenue Asheboro, NC 27205 (336) 636-7150	Nermin Hairlahovic Plant Manager 408 Telephone Avenue Asheboro, NC 27205 (336) 629-1436 nermin.hairlahovic@michelin.com	Ginger Ellis Consultant 1020 Lady's Lane Anderson, SC 29621 (864) 367-0481 gellis@aegisenv.com	

Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2020	0.0100	2.22	170.76	1.86	4.61	3.19	0.5876 [Xylene (mixed isomers)]
2019	0.0200	2.62	171.10	2.20	4.43	3.13	0.5728 [Xylene (mixed isomers)]
2018	0.0200	3.21	184.54	2.69	4.63	3.18	0.5503 [Xylene (mixed isomers)]
2017	0.0200	2.93	196.79	2.46	4.43	2.97	0.5153 [Xylene (mixed isomers)]
2016	0.0100	3.01	203.12	2.52	4.49	3.20	0.5409 [Xylene (mixed isomers)]

Consultant: Aegis Environmental, Inc **Contact:** Ginger Ellis **Phone:** 864-367-0481 **Email:** gellis@aegisenv.com

<p>Review Engineer: Gautam Patnaik</p> <p>Review Engineer's Signature: _____ Date: XXX/xx/2023</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue: 05051T23 Permit Issue Date: XXX/xx/2023 Permit Expiration Date: XXX/xx/2028</p>
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I. Facility Description.

Oliver Rubber Company, LLC is located at 408 Telephone Avenue, Asheboro, NC 27205. Cooper Tire initially owned Oliver Rubber, but the facility has now been purchased by Michelin. The permitted name of the facility will remain as Oliver Rubber. This is a tire tread manufacturing facility where raw materials for various rubber compounds including polymers, oils, fillers, curatives, anti-oxidants, etc., are introduced into the Banbury mixers. Rubber stock that is brought on-site travels to the extruders, which form the rubber into basic tread shapes. From the extruders, the treads travel to the presses for final shaping and curing. Following pressing, the treads are buffed in preparation for cementing. Cement is applied at the cementing stations and cured dried in the curing Finishing ovens. The cement is added to the treads so that they can be attached to old tire carcasses. The treads are then rolled up and prepared for shipping.

II. Purpose of Application

Application No. 7600053.20A was received on December 21, 2020 and was considered incomplete (not enough copies of the application submitted). The additional application copy was received on January 5, 2021. Application No. 7600053.20A will be processed in accordance with 15A NCAC 02Q .0501(c)(1) because it is requesting a modification that contravenes an existing standard in the current permit. Therefore, it will go through both the 30-day public notice and the 45-day EPA review at this time.

The applicant states in the current Title V operating permit (05051T22) that there are BACT limits for the Tread Buffers and the Tread Presses associated with an uncompleted project. The BACT limits were submitted in an application to construct and operate equipment (the new mixer replacements, the new extruders, the new press, the new buffer and the new cementer) which were never installed. In October 2007, Michelin purchased the facility. Michelin has removed the compound weighing and the Banbury mixing operations. The 2003 PSD application was submitted by the Cooper Tire & Rubber Company (previous owner) on November 11, 2003. Permit No. 05051T15 was issued which included the usage of a rubber compound referred to as Compound E. Based on discussions with DAQ, this application is requesting that the current PSD Compound E process be removed from the permit and that the facility be allowed instead to use a rubber silica compound in the tread process. The impacted sources ES-501, ES703, ES-502, ES-704 will still be part of the permit but will not process Compound E.

Per the 2003 application, the construction application was for two projects. The first project consisted of the following:

- A. Add a new tread rubber extruder
- B. Add a new bonding gum extruder
- C. Add a new two-sided tread press
- D. Add a new tread buffing/cementing line
- E. Increase utilization of the rubber mixers
- F. Increase utilization of the two small boilers

The second project consisted of the following:

A new rubber compound mixture will be processed in the facility causing increased VOC emissions from all rubber processing equipment. Equipment changes required for this project consist of:

- * Replace Mixer #2
- * Replace Mixer #3

The facility plans to mix, extrude, mold (press), buff and cement the treads using the new rubber compound. This new compound was designated as compound E in the PSD application.

Per the PSD application, this would effectively increase the facility’s tread production capacity by approximately 50 percent. The equipment that was existing at the time of the construction application was:

- compound weighing, 3 Banbury mixing operations
- 2 mixing mills,
- 2 tread presses,
- 2 tread buffers, and
- 2 cement applications stations with associated drying ovens.

BACT limits in the Preliminary Determination for the previous PSD application:

Emission Source	BACT Requirement
New and modified mixers	No control (inherent Compound E throughput limit)
New extruders and existing extruders processing Compound E	No control
New press	Compound E throughput limitation
New tread buffer	Compound E throughput limitation
New tread cementer	Thermal oxidizer

Per the Preliminary Determination, Pressing of the Compound E rubber will be limited to 20% of the maximum theoretical pressing capacity (2,060 pounds per hour or 18,043,848 pounds per year). BACT for the Oliver Rubber presses is the Compound E throughput limitation. BACT for the Oliver Rubber presses is a Compound E throughput limitation of 5,114,547 square feet per year based on the press limitations for Compound E.

Also, the BACT limitation for the buffers was based on the press limitation with the limitation for the buffers being stated in square footage of throughput. The limitation was 5,114,547 square feet per year. As stated earlier in this review, the mixer replacements, the new extruders, the new press, the new buffer and the new cementer were never installed.

Since the original application was completed by Cooper Tire and Rubber and the confidential copy is not available to the current personnel, Oliver Rubber (new owner Michelin) has limited knowledge of the actual Compound E rubber.

Oliver Rubber believes that Compound E is likely a reference to rubber that was compounded with silica for increased rolling resistance which in turn increased car mileage rates. In order to use silica in rubber a specialized binder was required. The silica binder is a triethoxysilyl polysulfide compound. It is often referred to as “silane”.

When the silica-based rubber is processed, ethanol is off-gassed during the processing of the silica binder containing rubber. Thus, silica binder containing rubber processing results in VOC emissions from the binder off-gassing.

Michelin (the current owner of Oliver Rubber) plans to use silica-based rubber containing a binder in the tread process in the future, but does not use the same rubber mixes as Cooper Tire. The silica percentages and the resulting VOC off-gassing are not the same. As a result, Michelin through their process experience, has developed an internal off-gassing factor for rubber processing different from Cooper Tire. The only emission from the silica binder usage is ethanol (VOC). The PTE from using the silica binder is less than the VOC PSD threshold of 40 tons per year. VOC off-gassing is based on pounds of “silane” binder in the rubber processed multiplied by the internally established emission factor.

As stated previously in the review, sources ES-501, ES703, ES-502, ES-704 will still be part of the permit but will not process Compound E.

The only sources that are impacted by the change to add the new binder are:

- One 14 tread mold steam heated press (ID No. ES-501) with emission points (ID Nos. EP-516, EP-517, and EP-518) and
- One 16 tread mold hot oil heated press (ID No. ES-703) with emission points (ID Nos. EP-703 EP-704 and EP-706).

III. Applicable Regulations

1. 15A NCAC 02D .0515: “Particulates from Miscellaneous Industrial Processes”

Emissions of particulate matter from these sources ES-701 and 702 (Tread Extruding Processes), ES-501 (Tread Mold Steam Heated Press) and ES-703 (16 Tread Mold Hot Oil Heated Press) shall not exceed an allowable emission rate as calculated by the equation in the permit. As per discussions with the applicant, the facility is requesting to add silica binder containing compounds to the facility tread processes, however the applicant states that based on the AP-42 factors for curing, no PM emissions should be present. There is some “smoke” that comes off, so we agreed to keep the visible emissions.”

Thus, the above sources are not subject to this regulation.

2. 15A NCAC 02D .0521: “Control of Visible Emissions”

Currently the visible emissions from each of the heated presses (ID Nos. ES-501, and ES-703) are subject to no more than 20 percent opacity when averaged over a six-minute period.

Monitoring

To ensure compliance, once a month the applicant shall observe the emission points of these two presses (ID Nos. ES-501, and ES-703) for any visible emissions above normal. The monthly observation must be made for each day of the calendar year period to ensure compliance with this requirement. The applicant shall establish “normal” for these sources in the first 30 days following the starting date of the use of silica binder at these two presses (ID Nos. ES-501, and ES-703).

If visible emissions from these sources are observed to be above normal, the applicant shall take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken or demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes in limit given,

Recordkeeping

The results of the monitoring shall be maintained in a logbook on-site and made available to DAQ upon request. The logbook shall record the following:

The date and time of each recorded action;

The results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance and corrective actions taken; and

The results of any corrective actions performed.

Reporting

The applicant shall submit a semi-annual summary report of the monitoring and recordkeeping activities.

3. 15A NCAC 02D. 0530: "Prevention of Significant Deterioration (PSD)"

The facility plans to use silica-based rubber containing the binder in the tread process in the future. The silica percentages and the resulting VOC off-gassing are not the same as the off-gassing from the previous binder Compound E. As a result, the facility through their process experience, has developed an internal off-gassing factor for rubber processing. The basis for the off-gassing emission factors are unknown to the facility personnel. The current permit limits for Compound E appear to be based on potential emissions for equipment that was not installed and equipment that has been removed.

The Compound E emissions were calculated using the facility's internal factors. Based on discussions with DAQ the facility requests the current PSD Compound E process be removed from the permit. Per the current permit, this compound was used in sources (ID Nos. ES-501, ES-703, ES-502, and ES-704).

Additionally, Oliver is requesting to add silica binder containing compounds to the facility tread processes. Since this represents new VOC emissions from the facility, the PTE was determined at tread throughput maximum capacity. The only emission from silica binder usage is ethanol (VOC). The PTE from using the silica binder is less than the VOC PSD threshold of 40 tons per year. VOC off-gassing is based on pounds of "silane" binder in the rubber processed multiplied by the internally established emission factor. Since the potential VOC emissions at maximum tread throughput capacity are less than 40 tons per year from the usage of the "new" binder in sources ES-501 and ES-703, no PSD Avoidance Condition will be added to the permit.

The Responsible Official for this facility Mr. Steve Scruggs, the Plant Manager in an e-mail on 6/10/2022 wrote requesting the information in this application to be considered confidential including process and plant capacities and product usage rates. The facility considers this information confidential and a trade secret. They believe that a competitor could use this data, in combination with other non-confidential information readily available to the public, to benchmark and derive many facts and strategies of the corporation, including facility effectiveness, facility efficiency, facility product line mix, unique process layout, material usage breakthroughs, and corporate sourcing and marketing strategies. Disclosure or use of such sensitive information would cause irreparable harm to our business in a fiercely competitive global marketplace.

In consideration of keeping the emission factors confidential the emission calculations are not included in this review. However, the calculations were reviewed by this review engineer and showed that the potential emissions are less than the threshold for VOC emissions.

After this modification, sources ES-501, ES-703, ES-502, and ES-704 will not be subject to PSD and their classification as PSD will be removed from the source table.

The DAQ did not respond to Mr. Steve Scruggs' request for confidentiality within the required 180-day time frame, agreeing or disagreeing as to whether the requested information is considered confidential. However, the DAQ confidential business information policy and procedure has been revised and signed by the Director. Future modifications by this facility will be compared to the latest policy and procedure.

State-Enforceable Only

4. 15A NCAC 02D .1100: "Toxic Air Pollutant (TAP) Emissions Limitations"

During a modification request in Application No. 7600053.15B for Permit # 05051T20, the facility requested removal of toxic emission limits from their permit. The modeling had shown that the facility was in compliance with all the toxics requirements and removing the toxics conditions did not pose a health risk. Thus, the limits were removed from the permit. Subsequent changes after the above modification did not warrant a toxics review. This application will result in the increase of ethanol (VOC) emissions, which is not a TAP. This application is not subject to a toxics review.

5. 15A NCAC 02D .1111: MACT Subpart XXXX – National Emissions Standards for Hazardous Air Pollutants for "Rubber Tire Manufacturing."

As per section 2.2 B.1. of the permit, the facility is subject to a MACT avoidance condition which limits the facility wide emissions of individual hazardous air pollutants to less than 10 tons per year of each and less than 25 tons per year of all hazardous air pollutants combined.

This modification will not cause the hazardous air pollutant to exceed the above limit and will not trigger applicability of the above regulation.

IV. NSPS, NESHAPS/MACT, PSD, Attainment Status, 12(r), CAM, (NCGS) 143-215.107(a)(5) (House Bill 952), Compliance Status, and Application Processing Schedule:

NSPS

The diesel fuel-fired emergency fire pump (EFP) is subject to NSPS Subpart IIII "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines." This modification will not affect this regulation.

NESHAP/MACT

Sources at this facility (ID Nos. ES-501, ES-703, ES-502, and ES-704) are not subject to the "National Emissions Standards for Hazardous Air Pollutants: Rubber Tire Manufacturing" MACT (Subpart XXXX), 02D .1109 Case by Case MACT, and MACT Subpart ZZZZ) since this facility is an area source of HAPs emissions. The addition of binders in the process does not change this applicability.

Attainment Status

This facility is in Randolph County, which is in attainment according to 02D .0902 and 40 CFR §81.334 “Designation of Areas for Air Quality Planning Purposes.”

112(r)

This facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule.

Compliance with (NCGS) 143-215.107(a)(5) (House Bill 952)

The current permit is not subject to any toxic air pollutant requirements. This modification will not cause an increase of any toxic air pollutant emissions to the environment and will not present an unacceptable risk to human health and thus comply with North Carolina General Statute (NCGS) 143-215.107(a)(5) (House Bill 952).

CAM

The Compliance Assurance Monitoring (CAM) Rule (40 CFR Part 64) applies to pollutant-specific emissions units (PSEU) that are pre-control major sources and use a control device to comply with an emissions limit. In order to be subject to CAM, a source must be subject to an emission limit, use a control device to achieve compliance with this limit, and the “before control” emissions from this source are greater than 100 tons per year of any criteria pollutant.

The steam heated press (ID No. ES-501), the hot oil heated press (ID No. ES-703), and the tread buffers (ID Nos. ES-502 and ES-704) were not subject to a CAM plan. The addition of binders to these sources does not change the emissions significantly from these sources for the applicability of a CAM plan.

Compliance Status

As per the latest inspection done on 11/09/2021 by Mr. Robert Barker of the Winston-Salem Regional Office, “Based on review of records and visual observations, this facility appeared to be in compliance with Air Quality standards and regulations at the time of this inspection.”

V. Consistency Determination, Professional Engineer Seal, Increments, Comments, and Recommendations

Consistency Determination

As per G.S. 143-215.108 (f) an applicant for a permit under this section for a new facility or for the expansion of a facility permitted under this section shall request each local government having jurisdiction over any part of the land on which the facility and its appurtenances are to be located to issue a determination as to whether the local government has in effect a zoning or subdivision ordinance applicable to the facility and whether the proposed facility or expansion would be consistent with the ordinance.

The applicant stated that they were not increasing the emissions at this facility and they were reducing VOC emissions below the PSD level. Also, no equipment is being added.

The DAQ agrees with the applicant that a zoning consistency determination is not required with this application.

Professional Engineer Seal

As required by 15A NCAC 02Q .0112 “Applications Requiring Professional Engineer (PE) Seal,” a professional engineer registered in North Carolina shall be required to seal technical portions of air permit applications for new sources and modifications of existing sources of particulate matter with air flow rates of more than 10,000 actual cubic feet per minute (acfm). This modification does not add or modify any existing control devices and a PE Seal is not required.

Increments

As per <http://daq.state.nc.us/permits/psd/docs/mbd1.pdf>, the PSD minor baseline dates have not been triggered for Randolph County. Thus, there is no increment to report.

Comments, and Recommendations

The Wilmington Regional Office, the applicant, and the Stationary Source Compliance Branch (SSCB) were provided a copy of the modified draft permit for this application for their comments and their comments were taken into consideration.

On 9/12/2022 SSCB wrote back that they did not have any comments.

The applicant provided their comments on 9/19/2022:

- On the draft permit page 7 a correction is need Permit Section C. Two tire tread buffers consisting of:
 - Two Tire Tread Buffers (ID Nos. ES-502 and ES-704) controlled individually by two baghouse dust collectors (ID Nos. CD-012 and CD-707, 10.500 cfm, each) with emission points (ID Nos. EP-012 and EP-707, respectively)
- 2.1 B.1.c., for the monitoring requirement, since changing to silica based rubber does not change the opacity only the VOC, we believes normal conditions are established, thus the requirement to establish normal was removed.
- Also, some minor corrections which were done

The Regional Office comments received on 11/28/2022 are addressed as below:

-The facility has one parts washer not listed on the permit. As per the SDS, the chemical for this parts washer does contain VOC.

In discussion with the facility, they will address this issue in their renewal application to be applied soon.

- No requirement in the permit for conducting annual inspections on the two baghouse dust collectors (CD-012 and CD-707). It should be noted that the last annual internal inspection of the bagfilters was conducted on January 12, 2021 for CD-012 and January 19, 2021 for CD-707.

The requirement in the permit for conducting annual inspections on the two baghouse dust collectors (CD-012 and CD-707) were inserted in the modified permit in Section 2.1 C.1.c through f.

- The table for Condition 2.1.F lists under the applicable regulation column, 2Q .1111 (40 CFR 63, Subpart ZZZZ). It should be corrected to 02D .1111 (40 CFR 63, Subpart ZZZZ).

Updated.

- Condition 2.2.B.1.b.i lists Material Safety Data Sheet (MSDS). This should be updated to Safety Data Sheet (SDS).

Corrected.

- In the title for Condition.2.1.E, the emission point (EP-500) for boiler ES-02 is not listed.

Corrected.

- Insignificant source IES-15 (eight LPG storage tanks) have been removed from the facility.

Removed.

On 11/28/2022, Joe Voelker of the permit Section had some additional comments that are addressed below:

- “Here are the updated conditions for the engines. The permit addresses the engine as if it is a major HAP source NSPS- updated to current shell standards and to reflect emergency demand response vacatur and other rule changes. MACT – consistent with an area source and current shell standards.”

These are addressed below “TV Permit Revisions with respect to Boiler MACT Revisions”

- HAP major avoidance – you should update condition to incorporate engine.”

These requirements are already there in Section 2.2 B.1 of the permit.

On 1/10/2022, the applicant responded to the modified drafts for “TV Permit Revisions with respect to Boiler MACT Revisions”

- They only had one comment regarding compliance as mentioned in Section 2.1 B 1.c of the permit.

VI. Miscellaneous

- The responsible official in the draft permit matches the information on IBEAM.
- The facility address matches the information on IBEAM.
- There are no new insignificant activities being added with this modification, however IES-15 (eight LPG storage tanks) was removed.
- Removed all references from the bottom of the permitted sources table that no longer apply.
- Removed word “Subpart” from the permit sources table (i.e., NSPS Subpart IIII, etc.,).
- All old testing requirements have been deleted.
- Updated language from the shell for regulations (example 15A NCAC 02D .0515, .0521, .0516, etc., where required).
- Updated General Conditions.

- Format/check reference to Section in the permit: (Sample examples as follows: “is required under Section 2.1 A.8.f below,” “opacity standard in Section 2.1 A.8.c above,” “limit in Section 2.1 A.8.c above,” “according to Section 2.1 A.8.g below.” “performance testing in Section 2.1 A.8.f.i above,”).

TV Permit Revisions with respect to Boiler MACT Revisions

With regards to “TV Permit Revisions with respect to Boiler MACT Revisions” email from Joe Voelker on 10/10/2022 Joe Voelker provided regulatory updates regarding the “TV Permit Revisions with respect to Boiler MACT Revisions” email on 10/10/2022 the salient features are mentioned below:

Section 2.1 F. “One diesel-fired emergency fire pump (Maximum power output of 315kW, ID No. EFP)” Joe provided updates on MACT Subpart ZZZZ “National Emission Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines” addressed in Section 2.1 F 3. Of the permit the major implications are addressed below:

The applicability still remains the same and this source shall meet the requirements of 40 CFR 63 Subpart ZZZZ and Subpart A by meeting the requirements of 40 CFR 60 Subpart IIII.

NSPS Subpart IIII “Standards of Performance for Stationary Compression Ignition Internal Combustion Engines,” the updates to this is addressed in 2.1 F 4. of the permit.

The applicability is based on 40 CFR 60.4200(a)(2)(ii) (for fire pump) manufactured as a certified National Fire Protection Association (NFPA) fire pump engine after July 1, 2006.

Emission Standards

The emission standards in the earlier permit as mentioned below:

Pollutants	NMHC + NOX	PM
*Emissions measured in: g/KW-hr (g/HP-hr)	4.0	0.20

The above table above is replaced with a reference to “emission standards in Table 4 of NSPS Subpart IIII for all pollutants, for the same model year and maximum engine power for this engine as per 40 CFR 60.4205(c) (Fire pump citation), in Section 2.1 F 4. Of the permit.

Also, 40 CFR 60.4205(c) requires “fire pump engines with a displacement of less than 30 liters per cylinder must comply with the emission standards in table 4 to this subpart, for all pollutants.”

Monitoring

Under monitoring requirement as per 40 CFR 60.4209(a) an emergency stationary CI internal combustion engine that does not meet the standards applicable to non-emergency engines, you **must install a non-resettable hour meter prior to startup of the engine**” and per 40 CFR 60.4209(b) “a stationary CI internal combustion engine **equipped with a diesel particulate filter to comply with the emission standards** in § 60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached.”

Compliance Requirements

Per §60.4206 “stationary CI ICE must operate and maintain stationary CI ICE that achieve the emission standards as required in §§ 60.4204 and 60.4205 over the entire life of the engine.”

VII. Table of Changes

Page No.	Section	Description of Changes
Page 1	Cover letter	Added revised cover page, updated letterhead, changed Permit revision number and date
Page 3	Cover letter	Added page containing “Notice Regarding The Right to Contest A Division Of Air Quality Permit”.
Page 4	Cover letter	Revised the Summary Of “Changes To The Permits” table.
Cover Page	Permit	Changed Permit number Changed “Replaces Permit” number Revised effective date of Permit Revised application number Revised complete application date
Page 2	Table of Contents	Changed Insignificant Activities list to Section 3 of the permit and the General Conditions as Section 4 of the permit
Source table	Permitted Sources Table	Remove PSD status from tread mold (ES-501 & ES-703), tread buffer (ES-502 & ES-704) and Tread Extruding Process (ES-701 & ES-702)
5	2.1	Removed “Reserved (for additional sources in the future)” A. through E.
5	2.1 A.	Removed 02D .0515 applicability from extruding process (ES-701 and ES-702)
6	2.1 B.	Removed 02D .0515 applicability from extruding process (ES-501 and ES-703)
6	2.1 B.1.c.	Added establish “normal” within 30 days of use of silica binder at presses (ID Nos. ES-501, and ES-703).
6	2.1 B.3.	Removed BACT for Compound E binder at presses (ID Nos. ES-501, and ES-703).
7	2.1 C. 1. c through f	Added monitoring, record keeping, and reporting requirement for baghouse dust collectors (ID Nos. CD-012 and CD-707)
7	2.1 C.3.	Removed BACT for Compound E from tread buffers (ID Nos. ES-502 and ES-704)
12	2.1 F 3.	Updated RICE MACT for area source (One diesel-fired emergency fire pump ID No. EFP)
12	2.1 F 4.	Updated Subpart IIII for (One diesel-fired emergency fire pump ID No. EFP)
16	2.2 B.1.b.i	Replaced Material Safety Data Sheets (MSDS) with Safety Data Sheet (SDS)
17	SECTION 3	Insignificant Activities per 15A NCAC 02Q .0503(8)
17	SECTION 3	Corrected IES-05 as “Shot blast mold cleaning operation (50,545 lbs media/yr)”
17	SECTION 3	Removed IES-15
17	SECTION 3	Corrected IES-18 as “Tread ink marking (non HAP/TAP ink, 578 lbs/yr)”
18 through 26	SECTION 4	General Conditions (version 6.0, 01/07/2022)