

**Iowa Department of Natural Resources
Title V Operating Permit**

Name of Permitted Facility: Titan Tire Corporation

**Facility Location: 2345 East Market Street
Des Moines, Iowa 50317**

Air Quality Operating Permit Number: 02-TV-013R1

Expiration Date: October 1, 2013

Permit Renewal Application Deadline: *April 1, 2013*

EIQ Number: 92-6802

Facility File Number: 77-01-003

Responsible Official

Name: Mr. Jeff Kramer

Title: Operations Manager

**Mailing Address: 2345 East Market Street
Des Moines, Iowa 50317**

Phone #: (515) 265-9404

Permit Contact Person for the Facility

Name: Mr. Brian A. Mills

Title: Environmental Coordinator

**Mailing Address: 2345 East Market Street
Des Moines, Iowa 50317**

Phone #: (515) 265-9363

This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit.

For the Director of the Department of Natural Resources

Douglas A. Campbell, Supervisor of Air Operating Permits Section

Date

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Abbreviations

acfm.....	actual cubic feet per minute
AERMOD.....	AMS/EPA Regulatory Model
AQD.....	Polk County Public Works- Air Quality Division
CAS.....	Chemical Abstract Service Registry
CE.....	Control Equipment
CEM.....	Continuous Emission Monitor
CFR.....	Code of Federal Regulation
°F.....	degrees Fahrenheit
EIQ.....	Emissions Inventory Questionnaire
EP.....	Emission Point
EU.....	Emission Unit
gr./dscf.....	grains per dry standard cubic foot
IAC.....	Iowa Administrative Code
IDNR.....	Iowa Department of Natural Resources
MACT.....	Maximum Achievable Control Technology
µg/m ³	Micrograms per Cubic Meter
MM BTU/ Hr.....	Million British Thermal Units per Hour
MSDS.....	Material Safety Data Sheet(s)
MVAC.....	Motor Vehicle Air Conditioner
NAICS.....	North American Industry Classification System
NESHAP.....	National Emission Standards for Hazardous Air Pollutants
NSPS.....	New Source Performance Standard
ppmv.....	parts per million by volume
psia.....	pounds per square inch absolute
lb./hr.....	pounds per hour
lb./MMBtu.....	pounds per Million British thermal units
SCC.....	Source Classification Codes
scfm.....	standard cubic feet per minute
sdefm.....	standard dry cubic feet per minute
SIC.....	Standard Industrial Classification
TPY.....	Tons Per Year
USEPA.....	United States Environmental Protection Agency
VCU.....	Vapor Combustion Unit

Pollutants

PM.....	Particulate Matter
PM ₁₀	Particulate Matter ten microns or less in diameter
SO ₂	Sulfur dioxide
NO _x	Nitrogen Oxides
VOC(s).....	Volatile Organic Compound(s)
CO.....	Carbon Monoxide
HAP(s).....	Hazardous Air Pollutant(s)

I. Facility Description and Equipment List

Facility Name: **Titan Tire Corporation**

Permit Number: 02-TV-013R1

Facility Description: Tire Manufacturing, SIC 3011

Emission Point Number	Emission Unit Number	Emission Unit Description	Polk County AQD Construction Permit Number
1	122, 122A-E, 123, 123A-B, 124	#27D Banbury	0578 Modified
2	002	#27D Banbury: Rotary Drum Coolers	0547
	125A	#27D Banbury: Pellet Dip Mixing (Rubber PM)	0547
3	121	#27D Banbury: Hand weighing Chemicals	Grandfathered
4	101, 103, 103A-D	#1 Banbury	1386
5	102, 104, 104A-D	#2 Banbury	0558A
6	110, 111, 111A-C, 111R	#4 Banbury	0682
7	114, 116, 116A-C, 116R, 117, 119, 119A, 127D	#5 Banbury	0619
8	115, 127, 127A-C, 127R	#6 Banbury	1385
12	301-306	L Calendar Operation: Breakdown Mills (2), Feed Mills (2), Ferrel Calendar, and Ferrel Inverted "L" Calendar	Grandfathered
17	405	Bead Dipping Drying Station Adhesive Applicator	Grandfathered
17A	406	Bead Dipping Drying Station Adhesive Applicator	Grandfathered
24	567	Curing Presses (21), Bldg. 8 (#544-549, 551-565)	Grandfathered
	607	Curing Press, Bag-O-Matic 75" (1), Bldg. 8 (#566)	0818A
	608	Curing Press, McNeil Akron 100" (1), Bldg. 8	0736 Modified
	608A	Curing Presses (6), Bldg. 8 (#538- 543)	Grandfathered

Emission Point Number	Emission Unit Number	Emission Unit Description	Polk County AQD Construction Permit Number
25	603	Curing Presses, McNeil /NRM, Bldg. 2, (3) 55" Dual (#667- 672), (4) 60" Dual (#649- 656)	Grandfathered
	603A	Curing Presses, (2) 63.5" McNeil Dual Cavity, Bldg. 2 (#659- 662)	Grandfathered
	604	Curing Press, NRM 62" Dual, Bldg. 2, (#665- 666)	0818B
	604A	Curing Press, NRM 62" Dual, Bldg. 2, (#657- 658)	0818B
26	606	Curing Presses, Bldg. 5, (8) McNeil Duals (# 615- 630), (27) Singles (#505- 531)	Grandfathered
	606S	Curing Press, McNeil (1- 55") Dual Cavity, Bldg. 5, (#613- 614)	1342
	606A	Curing Presses (5), McNeil, Bldg. 5 (#501- 504, 535)	Grandfathered
	606B	Curing Presses (2), McNeil, Bldg. 5 (#536- 537)	Grandfathered
27	602A	Curing Presses, 40" McNeil Dual (11) Curing Presses, 40.5" NRM Dual (24) Curing Presses, 42" McNeil Dual (11)	0855 Modified #4
	602B	Curing Presses, 40" McNeil Dual (10) Curing Presses, 42" McNeil Dual (16) Curing Presses, 44" NRM Dual (4) Curing Presses, 45" McNeil Dual (12)	
	609-611	Curing Presses, 45" McNeil Dual (#235-240)	
	612	Curing Press, 42" McNeil Dual (#241-242)	
	615-618, 634, 642, 643	McNeil 75" Tire Curing Presses #701-704, 753	
	619-620, 635	McNeil 85" Tire Curing Presses #751-752, 754	
	621-632	McNeil 63.5" Tire Curing Presses #151-174	
	633, 637, 638	Bolshevik 100" Tire Curing Press #705	
636, 639 - 641	Bolshevik 88" Tire Curing Press #755		
28	711	Tractor Tire Buffing and Repair Booth, Bldg. 12	0911
29	712	Passenger Tire Buffing and Repair Station, Bldg. 22	Grandfathered
34C	554	Tractor Tire Repair Booth, Bldg. 18	1032 Modified
35	913, 913A-D	Tire Mold Repair Welding Stations	Grandfathered
36	826	Tire Mold Cleaning Station (3 Mold Cleaning Sand Blasting Units)	0919
38	820	Boiler #1, 18.39 MM BTU/ Hr.	Grandfathered
	821	Boiler #2, 18.39 MM BTU/ Hr.	Grandfathered
39	822	Boiler #3, 43.88 MM BTU/ Hr.	Grandfathered
40	823	Boiler #4, 31.34 MM BTU/ Hr.	Grandfathered
41	007, 008	Slab Dip Mixers	Grandfathered
42	011	Bead Cement Mixing	Grandfathered
43	105	#1 and #2 Banbury Drop Mills	0558B
45	111D	#4 Banbury 36" Ferrell Shaping Mill	Grandfathered
	111E	#4 Slab Dip Applicator	Grandfathered
	221	#8 Rubber Extruder	Grandfathered
46	106	#1 and #2 Banbury Shaping Mills	Grandfathered
47	001	Carbon Black Unloading Station	Grandfathered

Emission Point Number	Emission Unit Number	Emission Unit Description	Polk County AQD Construction Permit Number
50	825	Rubber Hot Rooms (5), each with 150,000 BTU Natural Gas Furnaces (5)	0916
51	210-215,	#7 Extruder	Grandfathered
	218-219		0385
52	307-313	Adamson Z Calendar: Breakdown, Holding & Feed Mills & 4 Roll Z Calendar	Grandfathered
		<i>Tire Assembly Machines -</i>	
	500	NRM Model 89 (# 42)	1402
	501	Cooper Tire Model CR2 Conversion Mod 80 (#15)	1404
	502	Cooper Tire Model Conversion (#17)	1405
	504-510	NRM Model 80S (#'s 13, 14, 16, 19-22)	Grandfathered
	515-520	NRM Model 53 (#'s 27-31, 33)	Grandfathered
	521-522	NRM Model 60 (#'s 55, 72)	Grandfathered
	524-525	NRM Model C1519 (#'s 35, 36)	Grandfathered
	526-527	NRM Model 80W (#'s 39, 40)	Grandfathered
	563	NRM Model 95 (# 430)	0854 Modified
	574-577	NRM Model 95 (#'s 433 - 436)	0894 Revised
	564 & 570	NRM Model 95 - Building 22 (#431, 432)	0861
	511	NRM Model 610 (# 441)	1418
	569	NRM Model 610 (# 417)	1415
	512-514	NRM Model 89 (#'s 37-38, 41)	Grandfathered
	503	Han Kook Model 3255 (# 438)	1406
	578	Han Kook Model 3255 (# 437)	0894 Revised
	590	NRM Model 52 (# 43)	1452
	560	Tire Assembly System with Extruder, 2 Stripwinders, and 1 Spray booth (#518/519)	2047
	587	Tire Assembly System with Extruder, 2 Stripwinders, and 1 Spray booth (#427/428)	
	589	Tire Assembly System with Extruder, 2 Stripwinders, and 1 Spray booth (#429/430)	
	595	Tire Assembly System with Extruder, 1 Stripwinders, and 1 Spray booth (#520)	
597	Tire Assembly System with Extruder, 1 Stripwinders, and 1 Spray booth (#521)		
599	Tire Assembly System with Extruder, 1 Stripwinders, and 1 Spray booth (#523)		
596	Upstairs Tire Spraybooth	1363	
53		<i>Tire Assembly Machines -</i>	
	523	NRM Model 60 (#804)	0942 Modified
	528-533	NRM Model 75 (#'s 801-803, 812-814)	
	559, 561-562	NRM Model 59 (#'s 811, 805-806)	
	571-572	NRM Model 89 (#'s 807-808)	
584-585	NRM Model 59H (#'s 809-810)		

Emission Point Number	Emission Unit Number	Emission Unit Description	Polk County AQD Construction Permit Number
54		<i>Tire Assembly Machines -</i>	
	534-536, 538, 540-541, 545-550, 565, & 566A	NRM Model 61 (#'s 401-406, 408-412, 414-416)	Grandfathered
	537	Akron Standard Model 336 (#420)	1417
	539	NRM Model 40 (# 407)	Grandfathered
	542	Tire Assembly System with Extruder, Stripwinders (2), & Spraybooth (1)	1330 Revised
	543	Tire Assembly System with Extruder, Stripwinders (2), & Spraybooth (1)	1329 Revised
	552	Tire Assembly System with Extruder, Stripwinders (2), & Spraybooth (1)	1331 Revised
	566	NRM Model 610 (#418)	1414
	568	NRM Model 610 (# 419)	1416 Modified
	573	NRM Model 61C (#413)	Grandfathered
	55	126	Rubber Pellet Storage
56	401	Royle 2 Bead Former 1	Grandfathered
	402	NRM Bead Former 5	Grandfathered
	403	Royle 2 Bead Former 6	Grandfathered
	404	Solvent Wash of Bead Filler	Grandfathered
	407	Bead Former #7, NRM 2 ½ Rubber Extruder 22.1 L/D	1403
58	316	(3) Wasik Associates, Inc. 400 kV, 100 mA Electron Beam Scanners	2064
62	908	15,000 Gallon Fixed Roof Dustene Storage Tank	1420
63	907	15,000 Gallon Fixed Roof Hardite Storage Tank	1422
64	408	NRM Bead Former #3	2015
		<i>Tire Assembly Machines -</i>	
	579	NRM Model 80 (#23)	
	580-581	NRM Model 89 (#'s 25, 26)	
	582-583, 586	Akron Standard Model 114 (#'s 48, 49, and 50)	
	591-594	Akron Standard Model 114 (#'s 44, 45, 46, and 47)	
	598	Puncture Sealant Calendaring	

Insignificant Activities Equipment List

Insignificant Emission Unit Number	Insignificant Emission Unit Description
216	Marking Applicator Number 7 Extruder
217	Marking Applicator Number 7 Extruder
222	Zinc Stearate Applicator (dry powder additive)
314	Marking Applicator Z Calendar
315	Marking Applicator Z Calendar
801	Mill Room Safety Kleen Station: 30 gallon capacity
803	Tire Room Safety Kleen Station: 30 gallon capacity
804	Powerhouse Safety Kleen Station: 9 gallon capacity
805	Valve Shop Safety Kleen Station: 9 gallon capacity
806	Building 28, 1 st Floor Safety Kleen Station: 9 gallon capacity
807	Building 22, 1 st Floor Safety Kleen Station: 9 gallon capacity
901	Tomene Storage Tank: 12,000 gallon capacity
902	Tomene Storage Tank: 12,000 gallon capacity
903	Tomene Storage Tank: 12,000 gallon capacity
905	#6 Fuel Oil Storage Tanks (2): 187,000 gallon capacity
906	Tomene Storage Tank: 20,000 gallon capacity

II. Plant-Wide Conditions

Facility Name: Titan Tire Corporation
Permit Number: 02-TV-013R1

Permit conditions are established in accord with 567 Iowa Administrative Code Rule 22.108

Permit Duration

The term of this permit is: Five (5) years
Commencing on: **October 2, 2008**
Ending on: **October 1, 2013**

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code Rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

Plant-Wide Limits:

I) Plant wide limit of 150,000,000 pounds of master rubber processed in the facility per twelve (12) month rolling period. Twelve month rolling records of rubber processed in the facility shall be maintained on site for five (5) years and be made available to the representatives of Polk County AQD upon request.

Authority for Requirement: Polk County Construction Permit 0578 MODIFIED

II) Plant wide limit of the following amounts and maximum percent constituents of materials processed in the facility per twelve (12) month rolling period. Twelve month rolling records of each material processed in the facility shall be maintained on site for five (5) years and be made available to the representatives of Polk County AQD upon request.

- a.) Tread Cement: (91 weight % VOC, 0% HAP): 85,374 lbs./ 12- month period
- b.) Tire Wash Solvent: (100% VOC, 0% HAP): 813,527 lbs./ 12- month period
- c.) Breakdown Solvent: (100% VOC, 4 weight% Methanol, <1 weight% MIBK):
2,766 lbs./ 12- month period
- d.) Drum Cement: (83 volume% VOC, 83 volume % Hexane):
2,080 lbs./ 12- month period

Authority for Requirement: PTE limits were requested by the applicant.
567 IAC 22.108(14)

III) The facility is subject to the Rubber Tire Manufacturing NESHAP, 40 CFR §63.5980 through 6015, Subpart XXXX, promulgated July 9, 2002. Titan Tire has chosen emission limit Option 1- HAP constituent option to comply with Subpart XXXX. NESHAP XXXX is attached as Appendix A to this Title V Permit.

Authority for Requirement: 40 CFR 63 Subpart XXXX
567 IAC 23.1(4)"cx"
Polk County Board of Health Rules and Regulations: Chapter V,
Article VIII, Section 5-20 (xxxx)

Emission Limits:

Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:

Opacity (visible emissions): <20% opacity
Authority for Requirement: Polk County Board of Health Rules and Regulations: Chapter V,
Article IV, Section 5-9

Sulfur Dioxide (SO₂): 500 parts per million by volume
Authority for Requirement: 567 IAC 23.3(3)"e"
Polk County Board of Health Rules and Regulations: Chapter V,
Article IX, Section 5-27

Particulate Matter: If the Polk County Health Officer determines that a process complying with the emission rates specified in Table 1 of Section 5-15 of Polk County Board of Health Rules and Regulations Chapter V is causing or will cause air pollution, the Polk County Health Officer will notify the source of such determination. Upon notification, the source shall not emit particulates in amounts greater than 0.10 grain per standard cubic foot of exhaust gas.
Authority for Requirement: Polk County Board of Health Rules and Regulations Chapter V,
Article VI, Section 5-14(b)

Particulate Matter:
No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24. For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B).
Authority for Requirement: 567 IAC 23.3(2)"a"

Combustion for indirect heating: Inside any metropolitan statistical area, the maximum allowable emission from each stack, irrespective of stack height, shall be 0.6 pounds of particulates per million Btu input.
Authority for Requirement: 567 IAC 23.3(2)"b"(2)
Polk County Board of Health Rules and Regulations Chapter V,
Article VI, Section 5-15(b)

Fugitive Dust: It shall be unlawful for any person handling, loading, unloading, reloading, storing, transferring, transporting, placing, depositing, throwing, discarding, or scattering any ashes, fly ash, cinders, slag or dust collected from any combination process, any dust, dirt, chaff, wastepaper, trash, rubbish, waste or refuse matter of any kind, or any other substance or material whatever, which is likely to be scattered by the wind, or is susceptible to being wind-borne, to do so without taking reasonable precautions or measures to prevent particulate matter from becoming airborne so as to minimize atmospheric pollution.

Authority for Requirement: Polk County Board of Health Rules and Regulations Chapter V, Article IX, Section 5-24

Fugitive Dust: Attainment and Unclassified Areas - No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance, as defined in Iowa Code section 657.1, from becoming airborne. All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not limited to, the following procedures.

1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizers or limestone.
4. Covering at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.

Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan

The owner/operator shall comply with the applicable requirements listed below. The compliance status is based on information provided by the applicant.

Unless otherwise noted in Section III of this permit, Titan Tire Corporation is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which become effective during the permit term, Titan Tire Corporation shall comply with such requirements in a timely manner.

Authority for Requirement: 567 IAC 22.108(15)

III. Emission Point-Specific Conditions

Facility Name: Titan Tire Corporation

Permit Number: **02-TV-013R1**

Emission Point ID Number: 1

Associated Equipment

Associated Emission Unit ID Numbers: 122, 122A, 122B, 122C, 122D, 122E, 123, 123A, 123B, and 124

Emissions Control Equipment ID Number: CE-01

Emissions Control Equipment Description: Airtrol 435 AW12 Pulse-Air Baghouse

EU	EU Description	Raw Material	Rated Capacity	Control ID
	(#27D Banbury Mixer):			
122	Carbon Black Loading	Carbon Black	6,688.5 lbs./ hr.	CE-01
122A	Chemical Loading	Chemicals	2,943.3 lbs./ hr.	CE-01
122B	Automatic Weighing Chemicals	Chemicals	1,471.7 lbs./ hr.	CE-01
122C	Charging Chute	Chemicals, Carbon Black	2,943.3 lbs./ hr.	CE-01
122D	Carbon Black Transfer	Carbon Black	6,637.2 lbs./ hr.	CE-01
122E	Rubber Mixing	Raw Rubber	17,123.3 lbs./ hr.	CE-01
123	Pelletizing	Rubber- VOCs	17,123.3 lbs./ hr.	CE-01
123A	Pelletizing	Rubber- Carbon Black	6,688.5 lbs./ hr.	CE-01
123B	Pelletizing	Rubber- Chemicals	2,943.3 lbs./ hr.	CE-01
124	Pellet Dip/ Coating	Pellets/ Pellet Dip	33.40 lbs./ hr.	CE-01

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit: No Visible Emissions

Authority for Requirement: Polk County Construction Permit 0578 MODIFIED

Pollutant: PM

Emission Limit: 0.10 gr/scf

Authority for Requirement: 567 IAC 23.3(2)"a"

Polk County Board of Health Rules and Regulations Chapter V,
Article VI, Section 5-14(b)

Pollutant: PM₁₀

Emission Limits: 3.29 lbs/hr., 14.4 TPY, and 0.0214 grains/ scf.

Authority for Requirement: Polk County Construction Permit 0578 MODIFIED

Pollutant: VOC

Emission Limits: 7.90 lbs/hr. and 34.6 TPY

Authority for Requirement: Polk County Construction Permit 0578 MODIFIED

Pollutant: HAPs (Combined) (Subset of VOCs)

Emission Limits: 2.70 lbs/hr. and 11.8 TPY

Authority for Requirement: Polk County Construction Permit 0578 MODIFIED

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput: Plant wide limit of 150,000,000 pounds of master rubber processed in the facility per twelve (12) month rolling period. Twelve month rolling records of rubber processed in the facility shall be maintained on site for five (5) years and be made available to the representatives of Polk County AQD upon request.

Control equipment parameters: The Airtrol 435 AW12 Pulse-Air Baghouse on #27D Banbury Mixer shall be thoroughly inspected and maintained semi-annually, at a minimum. Records showing the date, time, inspector's name, and any action(s) taken will be recorded in a log book, be maintained on site for five (5) years, and be made available to the representatives of Polk County AQD upon request.

Work practice standards: Routine Periodic Inspection.

Authority for Requirement: Polk County Construction Permit 0578 MODIFIED

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Stack Testing:

Pollutant - PM₁₀

Stack Test to be Completed by – October 1, 2010

Test Method - 40 CFR Part 51, Appendix M, Method 202 in conjunction with a Method 201 A test.

Authority for Requirement: 567 IAC 22.108(3)

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Compliance Assurance Monitoring Plan:

#27D Banbury Mixer Baghouse

I. Background

A. Emissions Unit

Description: #27D Banbury Mixer

Facility: Titan Tire Corporation, Des Moines, Iowa

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation: 567 IAC 23.3(2)"a"

Polk County Board of Health Rules and Regulations Chapter V,
Article VI, Section 5-14(b)

Pollutant: Particulate Matter

Emission Limit: 0.10gr/scf

Regulation: Polk County Construction Permit 0578 MODIFIED

Pollutant: PM₁₀

Emission Limits: 3.29 lbs/hr., 14.4 TPY, and 0.0214 grains/ scf.

Monitoring Requirements: Visible emissions, periodic monitoring

C. Control Technology

Airtrol 435 AW12 Pulse-Air Baghouse

II. Monitoring Approach

A. Indicator

Visible emissions will be used as an indicator.

B. Measurement Approach

EP 1 shall be visually checked for observable emissions once every day by a designated observer. The observation shall be taken while #27D Banbury Mixer is operating. The observation shall be noted in a log book, which shall state the date, time, observer's signature, and whether any emissions were observed. If an opacity is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet/ log book. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. The log book will be maintained on site for 5 years and be made available to representatives of Polk County AQD upon request. Baghouse corrective actions and maintenance activities shall also be noted in the log book.

C. Indicator Range

The indicator level is no visible emissions.

D. Performance Criteria

Data Representativeness: Measurements are being made at the emission point.

QA/QC Practices and Criteria: The observer will use EPA Reference Method 22-like procedures when checking for visible emissions.

Monitoring Frequency and Data Collection Procedure: A visible emission observation will be performed daily.

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 2Associated Equipment

Associated Emission Unit ID Numbers: 002 and 125A

Emissions Control Equipment ID Number: CE-02

Emissions Control Equipment Description: Airtrol 360AW-10 Baghouse

EU	EU Description	Raw Material	Rated Capacity	Control ID
	(Pellet Dip Mixing & Cooling):			
002	#27D Banbury Rotary Drum Coolers	PM from Pellet Dip	108.5 lbs./ hr.	CE-02
125A	Pellet Dip Mixing (Rubber PM)	PM from Pellet Dip	108.4 lbs./ hr.	CE-02

Applicable Requirements**Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)**

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit: <20% opacity

Authority for Requirement: Polk County Board of Health Rules and Regulations: Chapter V,
Article IV, Section 5-9

Pollutant: PM

Emission Limits: 0.825 lbs/hr., 3.61 TPY, and 0.10 grains/ dscf.

Authority for Requirement: Polk County Construction Permit 0547
567 IAC 23.3(2)"a"

Polk County Board of Health Rules and Regulations Chapter V,
Article VI, Section 5-14(b)

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

EP 2 shall be visually checked for observable emissions once every week by a designated observer. The observation shall be taken while the #27D Banbury Rotary Drum Coolers, (EU 002), and Pellet Dip Mixing, (EU 125A), are operating at or near full capacity. The observation shall be noted in a log book, which shall state the date, time, observer’s signature, and whether any emissions were observed. If visible emissions are observed, corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity ≥20% is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from observation of the violation.

If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits. The log book will be maintained on site for 5 years and be made available to representatives of Polk County AQD upon request.

Authority for Requirement: 567 IAC 22.108(3)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source’s compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility’s implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 3

Emission Unit vented through this Emission Point: 121
Emission Unit Description: #27D Banbury: Hand weighing Chemicals
Raw Material/Fuel: Chemicals
Rated Capacity: 1,471.70 lbs./ hr.

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit: <20% opacity

Authority for Requirement: Polk County Board of Health Rules and Regulations: Chapter V,
Article IV, Section 5-9

Pollutant: PM

Emission Limit: 0.10 gr./scf

Authority for Requirement: 567 IAC 23.3(2)"a"
Polk County Board of Health Rules and Regulations Chapter V,
Article VI, Section 5-14(b)

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

EP 3 shall be visually checked for observable emissions once every week by a designated observer. The observation shall be taken while the #27D Banbury: Hand weighing Chemicals, (EU 121), is operating at or near full capacity. The observation shall be noted in a log book, which shall state the date, time, observer’s signature, and whether any emissions were observed. If visible emissions are observed, corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity $\geq 20\%$ is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from observation of the violation.

If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits. The log book will be maintained on site for 5 years and be made available to representatives of Polk County AQD upon request.

Authority for Requirement: 567 IAC 22.108(3)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 4Associated Equipment

Associated Emission Unit ID Numbers: 101, 103, 103A, 103B, 103C, and 103D

Emissions Control Equipment ID Number: CE-04

Emissions Control Equipment Description: Micropeel Baghouse, Model 1005-8-20

EU	EU Description	Raw Material	Rated Capacity	Control ID
	(#1 Banbury Mixer):			
101	Hand weighing Chemicals	Chemicals	210.6 lbs./ hr.	CE-04
103	Rubber Mixing	Master Rubber (VOC)	17,123.3 lbs./ hr.	CE-04
103A	Automatic Weighing Chemicals	Chemicals	852.9 lbs./ hr.	CE-04
103B	Charging Chute	Chemicals, Carbon Black	1,063.5 lbs./ hr.	CE-04
103C	Carbon Black Loading	Carbon Black	1,253.4 lbs./ hr.	CE-04
103D	Chemical Loading	Chemicals	1,063.5 lbs./ hr.	CE-04

Applicable Requirements**Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)**

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit: No Visible Emissions

Authority for Requirement: Polk County Construction Permit 1386

Pollutant: PM

Emission Limit: 6.831 lbs/hr., 29.92 TPY, and 0.10 gr./ dscf

Authority for Requirement: Polk County Construction Permit 1386

567 IAC 23.3(2)"a"

Polk County Board of Health Rules and Regulations Chapter V,
Article VI, Section 5-14(b)

Pollutant: VOC/ HAP

Emission Limits: 7.53 lbs/hr. and 33.3 TPY

Authority for Requirement: Polk County Construction Permit 1386

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput: The emissions from this process and its emission units are included in the 150,000,000 lb throughput limit as required by Polk County Construction Permit #0578 (Modified).

Work practice standards: Routine Periodic Inspection.

Authority for Requirement: Polk County Construction Permit 1386

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Stack Testing:

Pollutant - PM

Stack Test to be Completed by- October 1, 2010

Test Method – Iowa Compliance Sampling Manual Method 5

Authority for Requirement – 567 IAC 22.108(3)"b"

The owner of this equipment or the owner’s authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Compliance Assurance Monitoring Plan:

#1 Banbury Mixer Baghouse

I. BACKGROUND

A. Emissions Unit

Description: #1 Banbury Mixer

Emission Units included: (EP 4 / CE-04 / EUs 101, 103, 103 A-D)

Facility: Titan Tire Corporation, Des Moines, Iowa

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation: Polk County Construction Permit 1386
567 IAC 23.3(2)"a"
Polk County Board of Health Rules and Regulations Chapter V,
Article VI, Section 5-14(b)

Pollutant: Particulate Matter

Emission Limit: 6.831 lbs/hr., 29.92 TPY, and 0.10 gr./ dscf

Monitoring Requirements: Visible emissions, periodic monitoring

C. Control Technology

Micropeel Baghouse, Model 1005-8-20

II. Monitoring Approach

A. Indicator

Visible emissions will be used as an indicator.

B. Measurement Approach

EP 4 shall be visually checked for observable emissions once every day by a designated observer. The observation shall be taken while #1 Banbury Mixer is operating. The observation shall be noted in a log book, which shall state the date, time, observer's signature, and whether any emissions were observed. If an opacity is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet/ log book. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. The log book will be maintained on site for 5 years and be made available to representatives of Polk County AQD upon request. Baghouse corrective actions and maintenance activities shall also be noted in the log book.

The following parameters will be monitored daily (every 24 hours) on days of operation:

1. Differential pressure drop of the baghouse (magnehelic gauge reading)
2. Visible emissions from the scavenger system ductwork and solids handling equipment on roof
3. Visible emissions from the baghouse exhaust (EP 4)

The following parameters will be monitored weekly:

1. The baghouse, associated components, and ductwork inspected for leaking dust, holes, corrosion, and audible air leaks.

C. Performance Criteria (PC) and Corrective Action (CA)

1. Differential Pressure

(PC) Differential pressure drop over the baghouse should not exceed 9 inches water at the gauge reading.

(CA) Troubleshooting contingency measure will be implemented and corrective action will be taken within 72 hours of discovery.

2. Scavenger System

(PC) There should be no visible emissions from the scavenger system ductwork and solids handling equipment on roof.

(CA) Corrective action and clean up will be taken within 8 hours of discovery.

3. Exhaust

(PC) There should be no visible emissions from the baghouse exhaust.

(CA) Troubleshooting contingency measure will be implemented and corrective action will be taken within 8 hours of discovery.

4. Entire System

(PC) The baghouse, associated components, and ductwork should not have holes or corrosion; nor should it leak dust or have audible air leaks.

(CA) Corrective action will be taken within 7 days of discovery.

D. Record Keeping

The following records will be maintained on site for a minimum of five (5) years and will be available to representatives of Polk County AQD upon request to demonstrate on-going compliance:

The daily inspections log will track the

1. Differential pressure gauge readings
2. Lack of visible emissions from the exhaust
3. Lack of visible leaks from the scavenger system and solids handling equipment on the roof.
4. Any corrective actions taken.
5. Date and time of inspection.
6. Inspector's signature.

The weekly inspection log will track the inspection of the baghouse, associated components, and ductwork for lack of leaks, holes, corrosion, and audible air leaks.

E. Indicator Range

The indicator level is no visible emissions.

F. Performance Criteria

Data Representativeness: Measurements are being made at the emission point.

QA/QC Practices and Criteria: The observer will use EPA Reference Method 22-like procedures when checking for visible emissions.

Monitoring Frequency and Data Collection Procedure: A visible emission observation will be performed daily.

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 5Associated Equipment

Associated Emission Unit ID Numbers: 102, 104, 104A, 104B, 104C, and 104D

Emissions Control Equipment ID Number: CE-05

Emissions Control Equipment Description: Mikro Pulsaire 238 STRH-12-20 Baghouse

EU	EU Description	Raw Material	Rated Capacity	Control ID
	(#2 Banbury Mixer):			
102	Hand weighing Chemicals	Chemicals (PM)	210.6 lbs./ hr.	CE-05
104	Rubber Mixing (VOC)	Master Rubber (VOC)	17,123.3 lbs./ hr.	CE-05
104A	Automatic Weighing Chemicals	Chemicals (PM)	852.9 lbs./ hr.	CE-05
104B	Charging Chute	Chemicals, Carbon Black (PM)	1,253.4 lbs./ hr.	CE-05
104C	Carbon Black Loading	Carbon Black	1,253.4 lbs./ hr.	CE-05
104D	Chemical Loading	Chemicals	1,063.5 lbs./ hr.	CE-05

Applicable Requirements**Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)***The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit: No Visible Emissions

Authority for Requirement: Polk County Construction Permit 0558A

Pollutant: PM

Emission Limit: 0.10 gr/scf

Authority for Requirement: 567 IAC 23.3(2)"a"

Polk County Board of Health Rules and Regulations Chapter V,
Article VI, Section 5-14(b)Pollutant: PM₁₀

Emission Limits: 8.71 lbs/hr., 38.15 TPY, and 0.10 grains/ scf.

Authority for Requirement: Polk County Construction Permit 0558A

Pollutant: VOC

Emission Limits: 7.60 lbs/hr. and 33.30 TPY

Authority for Requirement: Polk County Construction Permit 0558A

Pollutant: HAPs (Combined)

Emission Limits: 2.40 lbs/hr. and 10.50 TPY

Authority for Requirement: Polk County Construction Permit 0558A

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput: Facility wide limit on master rubber utilized is 150,000,000 pounds per twelve month rolling period.

Work practice standards: Routine Periodic Inspection.

Reporting & Record keeping: Twelve month rolling records of rubber processed in the facility shall be maintained on site for five years and be made available to representatives of Polk County Air Quality Division upon request.

Authority for Requirement: Polk County Construction Permit 0558A

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Stack Testing:

Pollutant - PM₁₀

Stack Test to be Completed by – October 1, 2010

Test Method - 40 CFR Part 51, Appendix M, Method 202 in conjunction with a Method 201 A test.

Authority for Requirement: 567 IAC 22.108(3)

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Compliance Assurance Monitoring Plan:

#2 Banbury Mixer Baghouse

I. Background

A. Emissions Unit

Description: #2 Banbury Mixer

Facility: Titan Tire Corporation, Des Moines, Iowa

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation: 567 IAC 23.3(2)"a"

Polk County Board of Health Rules and Regulations Chapter V,
Article VI, Section 5-14(b)

Pollutant: Particulate Matter

Emission Limit: 0.10gr/scf

Regulation: Polk County Construction Permit 0558A

Pollutant: PM₁₀

Emission Limits: 8.71 lbs/hr., 38.15 TPY, and 0.10 grains/ scf.

Monitoring Requirements: Visible emissions, periodic monitoring

C. Control Technology

Mikro Pulsaire 238 STRH-12-20 Baghouse

II. Monitoring Approach

A. Indicator

Visible emissions will be used as an indicator.

B. Measurement Approach

EP 5 shall be visually checked for observable emissions once every day by a designated observer. The observation shall be taken while #2 Banbury Mixer is operating. The observation shall be noted in a log book, which shall state the date, time, observer's signature, and whether any emissions were observed. If visible emissions are observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet/ log book. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. The log book will be maintained on site for 5 years and be made available to representatives of Polk County AQD upon request. Baghouse corrective actions and maintenance activities shall also be noted in the log book.

C. Indicator Range

The indicator level is no visible emissions.

D. Performance Criteria

Data Representativeness: Measurements are being made at the emission point.

QA/QC Practices and Criteria: The observer will use EPA Reference Method 22-like procedures when checking for visible emissions.

Monitoring Frequency and Data Collection Procedure: A visible emission observation will be performed daily.

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 6Associated Equipment

Associated Emission Unit ID Numbers: 110, 111, 111A, 111B, 111C, and 111R

Emissions Control Equipment ID Number: CE-06

Emissions Control Equipment Description: Airtrol Pulse Type Baghouse, Model 221 AW12

EU	EU Description	Raw Material	Rated Capacity	Control ID
	(#4 Banbury Mixer):			
110	Hand weighing Chemicals	Chemicals (PM ₁₀)	210.6 lbs./ hr.	CE-06
111	Rubber Mixing (Chemical Load)	Chemicals, Carbon Black	1,063.5 lbs./ hr.	CE-06
111	Rubber Mixing	Master Rubber (VOC)	17,123.3 lbs./ hr.	CE-06
111A	Automatic Weighing Chemicals	Chemicals (PM ₁₀)	852.9 lbs./ hr.	CE-06
111B	Charging Chute	Chemicals (PM ₁₀)	1,063.5 lbs./ hr.	CE-06
111C	Rubber Milling	Final Rubber (Chemicals)	1,063.5 lbs./ hr.	CE-06
111R	Rubber Milling	Final Rubber (VOC)	17,123.3 lbs./ hr.	CE-06

Applicable Requirements**Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)***The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit: No Visible Emissions

Authority for Requirement: Polk County Construction Permit 0682

Pollutant: PM

Emission Limit: 0.10 gr/scf

Authority for Requirement: 567 IAC 23.3(2)"a"

Polk County Board of Health Rules and Regulations Chapter V,
Article VI, Section 5-14(b)Pollutant: PM₁₀

Emission Limits: 4.32 lbs/hr., 18.92 TPY, and 0.05 grains/ dscf.

Authority for Requirement: Polk County Construction Permit 0682

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Control equipment parameters: Pressure drop, (as measured by the Magnehelic Gauge), across the collector, (CE-06), of approximately 10 inches of water shall indicate the need for maintenance.

Work practice standards: The applicant shall provide, properly install, and maintain in calibration and good working order instruments for determining pressure drop across the baghouse.

Reporting & Record keeping: A daily log shall be maintained on site and shall be made available to members of Polk County AQD upon request. Daily visual inspection shall be conducted and results logged.

Authority for Requirement: Polk County Construction Permit 0682

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Stack Testing:

Pollutant - PM₁₀

Stack Test to be Completed by – October 1, 2010

Test Method - 40 CFR Part 51, Appendix M, Method 202 in conjunction with a Method 201 A test.

Authority for Requirement: 567 IAC 22.108(3)

The owner of this equipment or the owner’s authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Compliance Assurance Monitoring Plan:
#4 Banbury Mixer Baghouse

I. Background

A. Emissions Unit

Description: #4 Banbury Mixer
Emission Units included: (EP 6 / CE-06 / EU's 110, 111, 111 A-C, 111 R)
Facility: Titan Tire Corporation, Des Moines, Iowa

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation: 567 IAC 23.3(2)"a"
Polk County Board of Health Rules and Regulations Chapter V,
Article VI, Section 5-14(b)

Pollutant: Particulate Matter
Emission Limit: 0.10gr/scf

Regulation: Polk County Construction Permit 0682
Pollutant: PM₁₀
Emission Limits: 4.32 lbs/hr., 18.92 TPY, and 0.05 grains/ dscf.

Monitoring Requirements: Visible emissions, periodic monitoring

C. Control Technology

Particulate Control: Airtrol Pulse Type Baghouse, Model 221 AW12 (CE-06)

II. Monitoring Approach

A. Indicator

Visible emissions will be used as an indicator.

