

Lane Regional Air Protection Agency
Simple Air Contaminant Discharge Permit

REVIEW REPORT

Bridgestone Americas Tire Operations, LLC
dba: GCR Tire Centers

Permit No. 200574

PERMITTING

Permitting Action

1. This permit is a renewal for an existing facility. The primary reason for this permit action is to renew the expired permit. Emission estimations were updated as part of a simple non-technical permit modification issued in 2010 to include activities not previously accounted for in the previous permit. The facility requested that the amount of tires be increased from 27,500 to 66,000 annually as part of the modification.

Other Permits

2. No other permits have been issued or are required by LRAPA for this facility.

Attainment Status

3. The facility is located in an attainment area for all pollutants.

Fee Basis

4. The facility is considered a Simple ACDP source with the "Low" fee designation because actual emissions and future projected emissions are less than 10 tons/year for the pollutants emitted (PM, PM₁₀, and VOC) in accordance with LRAPA Section 37-0064.

SOURCE DESCRIPTION

Overview

5. The facility operates a tire retread manufacturing operation at 91033 Roberts Road in Coburg, Oregon. The facility controls Particulate Matter (PM) and recovers material through the use of a baghouse. Volatile Organic Compounds (VOCs) are also emitted during the tire retread process. Emissions are released during the following tire retread activities: tire buffing, hand buffing/skiving including adhesive and solvent usage, casing repairs including adhesive and solvent usage, cushion and tread application including adhesive and solvent usage, steam or electric heating of the casings in a curing chamber, and finally, painting of the tires using water-based paint. The tire buffing operation includes a collections system for tire buffings which are sold into the recycled rubber product market.

Process and Control Devices

6. Existing air contaminant sources at the facility will consist of the following:
 - Truck tire retread operations including: tire buffing where a pulse-jet baghouse is used to recover materials and to control emissions, hand buffing/skiving, casing repair, cushion and tread application, curing (steam or electric heat), and tire painting (water based paint).

EMISSIONS

Plant Site Emission Limits

7. The PSELs are set in accordance with Section 42-0040. The facility emits more than the de minimis level but has the capacity less than the Significant Emission Rate for PM, PM₁₀, and VOC and, hence, the PSELs for those pollutants are set at the Generic PSEL level. During the public comment period the PM_{2.5} temporary rules expired (February 19, 2011). The PM_{2.5} PSEL and emission factors were removed prior to issuance.
8. The facility estimates maximum production levels of 66,000 tires per year. Estimated maximum emissions are shown in the following table:

Device/Process	Pollutant	Annual Throughput	Emission Factor*	Emissions lbs/yr	Emissions Tons/yr
Tire Buffing and Painting	PM/PM ₁₀	66,000 tires/yr	0.0573 lb/tire	3,782	1.9
Various Tire Retreading Activities (including adhesive and solvent usage)	VOC	66,000 tires/yr	0.08941 lb/tire	5,900	3.0

*Composite emission factor for various tire retreading activities in facility's application. Emission factors are derived from AP-42, MSDS and industry study.

BASELINE EMISSION RATE

9. As a facility on a Simple ACDP, there are no baseline emission rates for any pollutant.

NESHAPs APPLICABILITY

10. There are no sources at this facility for which National Emission Standards for Hazardous Air Pollutants (NESHAPs) have been promulgated. Total emissions of Hazardous Air Pollutants (HAPs) are estimated by the facility to be approximately 178 lb/year or 0.09 tons/year.

NSPS APPLICABILITY

11. There are no sources at this facility for which New Source Performance Standards (NSPS) standards have been promulgated.

PUBLIC NOTICE

12. The draft was on public notice from January 31, 2011 to March 7, 2011. No written comments were submitted during the 35-day comment period.