United States Environmental Protection Agency
Region 7
Enforcement and Compliance Assurance Division

Air Branch

Air Branch Inspection Report
Unannounced Full Compliance Evaluation
Goodyear Tire & Rubber Company
2000 Northwest Highway U.S. 24
Topeka, Kansas 66618
FRS# 1100005965533

Mailing address:
Same as above

Inspection Date(s):
November 18-20, 2024

AVERY BOWERS
Digitally signed by AVERY BOWERS
Date: 2025.01.31 14:26:19 -06'00'
Avery Bowers, Inspector, ECAD, Air Branch

Authorized for Release by:

Lance Avey, Acting Air Branch Manager, ECAD

LANCE AVEY
Digitally signed by LANCE AVEY
Date: 2025.01.31 14:39:17 -06'00'
11201 Renner Boulevard
Lenexa, Kansas 66219

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APPENDICES

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INSPECTION OVERVIEW

INSPECTION OBJECTIVE

The objective of the full compliance evaluation (FCE) inspection was to determine compliance of the facility with the Clean Air Act (CAA), specifically those requirements listed in **Table 1**. The inspection was part of the U.S. Environmental Protection Agency's (EPA) for Reducing Air Toxics in Overburdened Communities National Enforcement Compliance Initiative. This report documents EPA's activities on site.

Table 1. APPLICABLE PERMIT CONDITIONS, REGULATIONS AND STANDARDS	
Code of Federal Regulation	**Standard Name**
40 CFR Part 60	Subpart BBB, Standards of Performance for the Rubber Tire Manufacturing Industry
40 CFR Part 60	Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
40 CFR Part 60	Subpart III, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 CFR Part 61	Subpart M, National Emission Standard for Asbestos
40 CFR Part 63	Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters
40 CFR Part 63	Subpart XXXX, National Emissions Standards for Hazardous Air Pollutants: Rubber Tire Manufacturing
40 CFR Part 63	Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
Title V Operating Permit	Sections VI. Applicable requirements VIII. Facility-Wide Applicable Requirements IX. Opacity Limitations and Monitoring X. Requirements Which Will Become Applicable During the Permit Term XII. Testing, Monitoring, Recordkeeping, & Reporting XIII. Reporting of Deviations from Permit Terms XIV. General Provisions

This inspection was conducted by Avery Bowers, EPA Region 7, Enforcement and Compliance Assurance Division, Air Branch.

FACILITY CONTACT INFORMATION

Table 2 lists the primary facility contacts in order of contact during the inspection.

Table 2. FACILITY CONTACT INFORMATION		
Name, Title	**Phone No.**	**Email Address**
Thomas Zornes, Environmental Health and Safety Coordinator	(785) 295-4565	thomas_zornes@goodyear.com
Eric Senn, General Manager	Did not obtain during visit	eric_senn@goodyear.com

Joshua Garlock, Trinity Consultant	Did not obtain during visit	Joshua.Garlock@trinityconsultants.com
Brian Spalding, Safety coordinator in mixing	Did not obtain during visit	Did not obtain during visit
William Murphy, Union Safety Technician	Did not obtain during visit	Did not obtain during visit
Curt Campbell, Plant Safety Technician	Did not obtain during visit	Did not obtain during visit
Jeremy Brown, Off the Road Safety Coordinator	Did not obtain during visit	Did not obtain during visit
Logan Cox, Powerhouse Operator	Did not obtain during visit	Did not obtain during visit

FACILITY OVERVIEW

Goodyear Tire & Rubber Company (Goodyear) originally began operating in Topeka around 1975 and has always been owned by Goodyear. The facility produces tires for trucks and off-the-road equipment. It operates 24-hours a day Monday through Saturday and has a downshift day on Sunday. The facility employs around 1,585 people. There are three shifts each day: 7:00 a.m. to 3:00 p.m., 3:00 p.m. to 11:00 p.m., and 11:00 p.m. to 7:00 a.m.

The last onsite compliance monitoring activities at the facility were on July 12, 2022, and August 4, 2023, which consisted of FCE inspections conducted by the Kansas Department of Health and Environment (KDHE). KDHE completed Title V certification reviews on May 9, 2023, and March 14, 2024.

According to EPA's Enforcement and Compliance History Online (ECHO) website, there has been no formal enforcement at this facility for at least five years. KDHE has not issued any informal enforcement notifications to the facility in the last ten years.

According to Goodyear's Title V operating permit issued by KDHE on January 18, 2024, the facility is subject to the regulations and standards subject to review during this inspection as noted in **Table 1.**

FACILITY OPERATIONS SUMMARY

Goodyear has a Standard Industrial Classification (SIC) code 3011, categorized as Tires and Inner Tubes, and a North American Industry Classification System (NAICS) code 326211, categorized as Tire Manufacturing (except Retreading). According to the permit, "the facility processes raw materials such as carbon black, natural and synthetic rubber, fabric, wire, compounds, and process oils from which the various sizes and types of tires are produced. Insignificant activities (IAs) of the facility include storage tanks of volatile organic liquid (VOL), carbon black/Hi-sil towers, dump sinks, dump sink blowers, presses, tire repair vessel, pot heaters, dewatering auger pits, parts washers, tire grinders, cooling towers, mill conveyors, space heaters, tire

building machines for truck tires, carcass building systems, tire building machines for OTR tires, and bladder presses."

FIELD ACTIVITIES SUMMARY

I arrived at the facility on November 18, 2024, at 2:55 p.m. and was unable to complete a drive by surveillance inspection. I did not observe visible emissions while entering the site. I made entry at the front gate at 3:01 p.m. and introduced myself to the security guards. One guard called a facility manager to let them know I had arrived. At 3:17 p.m., Mr. Zornes arrived at the visitor's gate. I introduced myself, presented my credentials, and provided my business card to Mr. Zornes. We went to the office, and Mr. Senn arrived at 3:29 p.m. I shared my credentials with him and explained the reason for my visit. I conducted an opening conference during which I explained that the purpose of the visit was to conduct an inspection to determine compliance with the CAA, specifically, to determine compliance with the regulations and standards listed in **Table 1**. I explained that during this visit, I would take videos of some processes using the Forward Looking Infrared (FLIR) Camera. Then the following day on November 19, I would ask for some general business information, observe work practices, check the extruders, calenders, conveyors, mixers, spray booths, boilers, generators, regenerative thermal oxidizer (RTO), dust collectors, and also, review associated records demonstrating compliance with the Title V operating permit and federal regulations. I explained to Mr. Senn that the facility would have an opportunity to make a claim of business confidentiality at the end of the inspection.

Mr. Senn left the office at 3:36 p.m. while Mr. Zornes and I made our way to the extruder processes. I took two FLIR videos of Emission Unit (EU) TU04 and the vulcanization area. I had a brief discussion with an employee about the new paint booth that was not operating yet. The employee stated that there was a miscommunication between the contractor and Goodyear so the paint booth was temporarily out of commission. After taking the videos and having a conversation, I left the facility at 4:59 p.m. I informed Mr. Zornes that I would return in the morning to continue the inspection.

On November 19, 2024, I arrived at 10:22 a.m. and observed no visible emissions. I signed in at the visitor's center at 10:31 a.m., and Mr. Senn greeted me at 10:39 a.m. We went to the office where Mr. Garlock from Trinity Consultants and Mr. Zornes were already present. I asked the gentlemen general questions about the facility. The conversations are described in the observation section of this report. We took a lunch break from 11:30 a.m. to 12:30 p.m. I was given a facility tour by Mr. Zornes and Mr. Spalding at 12:42 p.m. I was asked to wear my safety glasses, ear plugs, and high visibility jacket because it was facility policy. We began at the Mixer #1, and I took three FLIR videos of Mixer #1 and its components. We visited all the mixers, and I

took a FLIR video of Mixer #6 as well. At 1:25 p.m., we finished observing the mixers. Mr. Murphy joined Mr. Zornes and me, and we did the tiring finishing tour together. The tire finishing tour concluded at 1:57 p.m., and Mr. Zornes and I went to observe the calenders. Curt Campbell gave us a tour of the calender operations, and I took a FLIR video of the gum calender (EU-CALAC35). Jeremy Brown joined Mr. Zornes and me at 2:36 p.m., and we toured the extruders and band builder processes. Mr. Zornes and I continued the tour and visited the generators, boilers, and thermal oxidizer. **Appendix A** includes all the photos taken during the site tour. **Appendix B** includes the FLIR video log. We concluded the facility tour at 4:22 p.m., and I let the facility know that I would return in the morning for records review and to collect more FLIR videos of the extruders and vulcanization process. I left the facility at 4:40 p.m.

On November 20, 2024, I arrived at the facility at 8:56 a.m. and signed into the visitor's center at 9:00 a.m. I did not observe any visible emissions on my drive into the facility's premises. Mr. Zornes greeted me at the visitor's center at 9:06 a.m. We went to the conference room where Mr. Garlock was already present. Before starting the records review, I took FLIR videos of EU TU-04, EU TU-05, EU TU-02, EU PH-09, EU PH-10, EU PH-11, and EU PH-12.

I began the records review at 9:46 a.m. Mr. Senn arrived at 10:05 a.m. I asked for records pertaining to the boilers, EU-ELG01, and visible emission logs for the dust collectors as required by the Opacity Limitations and Monitoring section of the Title V operating permit. We took lunch from 11:57 a.m. until 12:31 p.m. When I returned, Mr. Zornes and I went to the generator's building to access records pertaining to the generators. Mr. Cox provided me the records for the emergency generators. Mr. Zornes and I returned to the conference room to finish the records review with Mr. Garlock. Mr. Senn returned to the conference room at 1:50 p.m. I requested documentation for the sidewall cementing VOC discharge percentage excel datasheet, RTO temperature log, RTO maintenance log, and the VOC information for the dust collectors. I did not obtain any copies of records while I was on-site. All information and notes taken during the records review are described in the observation section of the report.

I conducted a closing conference at 2:00 p.m. with Messrs. Senn, Zornes, and Garlock present. I did not leave a Notice of Potential Findings to the facility. I told the gentlemen that the facility needed to get a new battery for the hour meter on EU-ELG01 since it was not working. Mr. Senn signed the CBI form (**Appendix C**) and did not claim anything as confidential while I was on site. I departed the facility after I concluded the closing conference.

Site sampling activities are described in the **Measurement and/or Sampling Activities** section below.

Measurement and/or Sampling Activities

I conducted field measurements during the onsite inspection using the FLIR camera. **Table 3** summarizes field measurement and field sampling activities.

All environmental measurement activities were performed in accordance with the EPA Region 7 quality system. I followed manufacturer and EPA processes for instrument calibration; instrument calibration was documented through the EPA contractors which can be found at the Technology and Learning Center.

Table 3 summarizes field measurement activities.

Table 3. FIELD MEASUREMENT ACTIVITIES

Location Identifier	Date(s) and Time	Method and/or Procedure[1], and Equipment	Measurer Name
Emission Unit (EU) TU-04 (facing north)	11/18/2024 4:02 p.m.	**Region 7 procedure:** *FLIR ThermaCAM™ GasFindIR, GF320, and Similar Infrared Cameras*, **Equipment:** Teledyne, GX320, and Serial No.	Avery Bowers
EU TU-04 (facing north)	11/18/2024 4:06 p.m.	**Region 7 procedure:** *FLIR ThermaCAM™ GasFindIR, GF320, and Similar Infrared Cameras*, **Equipment:** Teledyne, GX320, and Serial No.	Avery Bowers
Vulcanization area	11/18/2024 4:50 p.m.	**Region 7 procedure:** *FLIR ThermaCAM™ GasFindIR, GF320, and Similar Infrared Cameras*, **Equipment:** Teledyne, GX320, and Serial No.	Avery Bowers
Mixer #1	11/19/2024 12:54 p.m.	**Region 7 procedure:** *FLIR ThermaCAM™ GasFindIR, GF320, and Similar Infrared Cameras*, **Equipment:** Teledyne, GX320, and Serial No.	Avery Bowers
Mixer #1 stack	11/19/2024 12:56 p.m.	**Region 7 procedure:** *FLIR ThermaCAM™ GasFindIR, GF320, and Similar Infrared Cameras*, **Equipment:** Teledyne, GX320, and Serial No.	Avery Bowers
Mixer #1 stack	11/19/2024 12:59 p.m.	**Region 7 procedure:** *FLIR ThermaCAM™ GasFindIR, GF320, and Similar Infrared Cameras*, **Equipment:** Teledyne, GX320, and Serial No.	Avery Bowers
Mixer #6	11/19/2024 1:16 p.m.	**Region 7 procedure:** *FLIR ThermaCAM™ GasFindIR, GF320, and Similar Infrared Cameras*, **Equipment:** Teledyne, GX320, and Serial No.	Avery Bowers
Gum calender	11/19/2024 2:16 p.m.	**Region 7 procedure:** *FLIR ThermaCAM™ GasFindIR, GF320, and Similar Infrared Cameras*, **Equipment:** Teledyne, GX320, and Serial No.	Avery Bowers
EU TU-04	11/20/2024 9:26 a.m.	**Region 7 procedure:** *FLIR ThermaCAM™ GasFindIR, GF320, and Similar Infrared Cameras*, **Equipment:** Teledyne, GX320, and Serial No.	Avery Bowers
EU TU-05	11/20/2024 9:28 a.m.	**Region 7 procedure:** *FLIR ThermaCAM™ GasFindIR, GF320, and Similar Infrared Cameras*, **Equipment:** Teledyne, GX320, and Serial No.	Avery Bowers
EU TU-02	11/20/2024 9:33 a.m.	**Region 7 procedure:** *FLIR ThermaCAM™ GasFindIR, GF320, and Similar Infrared Cameras*, **Equipment:** Teledyne, GX320, and Serial No.	Avery Bowers

Table 3. FIELD MEASUREMENT ACTIVITIES			
Location Identifier	**Date(s) and Time**	**Method and/or Procedure[1], and Equipment**	**Measurer Name**
EU PH-09, PH-10, PH-11, PH-12	11/20/2024 9:42 a.m.	**Region 7 procedure:** *FLIR ThermaCAM™ GasFindIR, GF320, and Similar Infrared Cameras*, **Equipment:** Teledyne, GX320, and Serial No.	Avery Bowers
[1] The current version of each procedure, at the time of the investigation, was followed.			

Observations and potential findings from the facility tour, records review, and sampling/measurement activities are noted in the **Investigation Observation and Potential Findings** section below.

INVESTIGATION OBSERVATIONS AND POTENTIAL FINDINGS

Ambient weather, site conditions, and field activities were documented in the field records. All photographs are attached as **Appendix A**. I made the following observations during the inspection. I discussed all observations with facility representatives during the closeout meeting unless otherwise noted in the observation description.

These observations are not final compliance determinations. The EPA Region 7 Air Branch case review team will make the final compliance determinations based on its review of this report and other technical, regulatory, and facility information.

EU: BLR06, BLR07 (natural gas boilers) are subject to Permit Condition B.

Permit Condition B (1)(a) and (b) requires Goodyear to perform periodic monitoring that limits visible air emissions from each emission unit to less than 20%. The facility must perform a qualitative assessment at least once a month using EPA Method 22. The facility must also keep records and report the observations. While I was on-site, I confirmed that the facility was performing monthly qualitative observations of the units. The facility stated that in each semi-annual report, the log of the observations is available. I reviewed logs submitted through the facility's semi-annual reports. EU-BLR06 and EU-BLR07 did not have any opacity readings above 20% from January 2022 to December 2023. There was missing data for January 2022 that is explained in the potential findings.

EU: PBB02-PBB09, B08 PB, B09 PB, and PBB11 (mixer blowers) are subject to Permit Condition D.

Permit Condition D (1)(a) and (b) requires Goodyear to perform periodic monitoring that limits visible air emissions from each emission unit to less than 20%. The facility must perform a qualitative assessment at least once a month using EPA Method 9. The facility must also keep

records and report the observations. While I was on-site, I confirmed that the facility was performing monthly qualitative observations of the units. The facility stated that in each semi-annual report, the log of the observations is available. I reviewed logs submitted through the facility's semi-annual reports. In the January 1, 2023, through June 30, 2023, report, the facility had observed EU-PBB08 having a 15-20% opacity reading. All other observations from 2022-2024 had no exceedances.

Permit Condition D (2)(a) and (b) requires Goodyear to have a written maintenance plan for the dust collectors. The facility must also have a log showing the dates of all routine or other maintenance, malfunction, or repair for the dust collectors. The log should include the nature of action taken and any corrective action or preventative measures taken. While I was on-site, I was able to verify that the facility had a written maintenance plan for the dust collectors (attached to the facility's Title V Operating permit), and Mr. Zornes provided me the maintenance logs. EU PBB11 had not been operational so the facility had no maintenance records to provide.

EU: PDB08, 09, 11 (mixer dyers), CBHS01 (carbon black handling), and BB02-BB09, BB011 (mixers) are subject to Permit Condition E.

Permit Condition E (1)(a) and (b) requires Goodyear to have a written maintenance plan for the dust collectors. The facility must also have a log showing the dates of all routine or other maintenance, malfunction, or repair for the dust collectors. The log should include the nature of action taken and any corrective action or preventative measures taken. While I was on-site, I was able to verify that the facility had a written maintenance plan for the dust collectors (attached to the facility's Title V Operating permit), and Mr. Zornes provided me the maintenance logs. EU BB011 had not been operational so the facility had no maintenance records to provide.

EU: PRE11-16, PRF01-18, MLPF00-06 (presses) and BB02-BB09, BB011 (mixers) are subject to Permit Condition F.

Permit Condition F (1)(a) and (b) requires Goodyear to limit the amount of volatile organic compounds (VOCs) emitted from the mixing and curing operations generated for the use of the coupling agent to less than 440 tons in each consecutive 12-month period. To demonstrate compliance with this requirement, the facility must maintain records of emissions of VOCs generated from the use of the coupling agent. While I was on-site, I was provided the spreadsheets with the values of the coupling agent, and the facility claimed the values as confidential. The facility stated it would send me data confirming that the tonnage was below the 440-ton threshold.

EU: BLR06 -09 (natural gas boilers) are subject to permit Condition G.

Permit condition G (1)(a) and (b) require the facility to limit the sulfur oxides (SOx) emissions to less than 1,121 tons/SOx in each consecutive 12-month period and nitrogen oxide (NOx) emissions to less than 196 tons/NOx in each consecutive 12-month period by the equations listed in the permit. While I was on-site, I asked the facility to provide the calculation data for finding the values to ensure that it met the thresholds. The facility stated that one variable used in each of the SOx (162.7lb/10^3 gals) and NOx (55lb/10^3 gal) equations was not applicable to the facility because the facility no longer uses fuel oil. After reviewing the equations and calculations, the facility is under the thresholds of emissions for permit condition G (1)(a) and (b).

Permit condition G (1)(c)(i) states the facility must monitor and record the volume of natural gas consumed in the boilers. While I was on-site, I reviewed the records for the total natural gas consumed by the boilers. The facility provided a spreadsheet with the meter readings.

EU: MX01 (Mixer #1) is subject to permit condition H.

Permit condition H (1)(a) and (b) states that the dust collector associated with Mixer #1 will be equipped with a monitoring device to measure the pressure differential. The device will be installed, calibrated, operated, and maintained according to manufacturer's specifications. The pressure also needs to be recorded at least once a day. The facility must establish a normal operating pressure range, and if the pressure drop reading is observed outside the established normal range, the facility must inspect and determine the cause and return the dust collector to normal operating conditions. The facility also needs to have a written maintenance plan for proper operation of the dust collector and a log of all routine or repair done to the device. While I was on-site, the facility confirmed that the dust collector had a pressure differential device. I have not been provided the normal operational temperature range for the device, nor have I received the maintenance or repair log for the device.

Permit condition H (2)(a)-(f) establishes the facility's requirement for minimizing VOC emissions through Best Available Control Technology (BACT) analysis and emission calculations using the regenerative thermal oxidizer (RTO) whenever Mixer #1 is operating. The RTO is required to achieve at least a 98% destruction efficiency. It must be equipped with a monitoring device to continuously measure the temperature in the combustion chamber, and a compliance assurance monitoring (CAM) plan is required. While I was on-site, I confirmed the performance test and BACT analysis done on the RTO. Mr. Zornes provided a copy of the test done in Lawton, Oklahoma, that established the 98% destruction efficiency of the RTO. He also provided me the combustion chamber operating temperature of the RTO and stated it was established based on a February 9, 2022, test. The average minimum temperature established was 1,550°F. On

December 11, 2024, Mr. Zornes emailed me the RTO temperature log from September 8, 2024, to December 9, 2024. I have not been provided the maintenance or repair log for the RTO.

EU: MX01CH (Mixer #1 carbon black handling) is subject to permit condition I.

Permit condition I (1)(a) states the facility must exhaust emissions from the mixer to its associated cartridge filter. The facility does route the exhaust emissions to the cartridge filter and while I was on-site, I was shown the manual that establishes the operating and maintenance procedures for the cartridge.

EU: TU02, TU04, TU05 (extruders) and PLUFSA (MRT green tire spray booth) are subject to Permit Condition J, R, and 40 CFR Part 60 Subpart BBB. The permit conditions have incorporated the federal regulation standards; therefore, references will be made to the CFR citations. EU-TU03 is exempt from this subpart because the bead diameter is greater than 19.7 inches.

The facility is applicable to this subpart because it is a rubber tire manufacturing plant that commenced construction, modification, or reconstruction after January 20, 1983. The tires subject to this subpart are defined as having a bead diameter less than or equal to 19.7 inches (0.5 meters).

40 CFR 60.542 (a)(1)(ii) states that for each undertread cementing operation, the facility has VOC emission thresholds it must meet. Goodyear has chosen to maintain the total uncontrolled VOC use to less than or equal to the levels specified in the rule depending on the duration of the compliance period. While I was on-site, I asked the facility how the facility complies with this rule. Mr. Garlock provided the documentation for the undertread cementing operation VOC usage. I asked what the compliance duration periods were, and he stated that the facility uses the number of days in the month to establish the duration. On November 22, 2024, Mr. Zornes emailed me the VOC usage values from August 2023 through July 2024. The pdf provided in the email was claimed as CBI. The values documented are below the compliance threshold.

40 CFR 60.542 (a)(2)(ii) states that for each sidewall cementing operation, the facility has VOC emission thresholds it must meet. Goodyear has chosen to maintain the total uncontrolled VOC use to less than or equal to the levels specified in the rule depending on the duration of the compliance period. While I was on-site, I asked the facility how the facility complies with this rule. Mr. Garlock provided the documentation for the undertread cementing operation VOC usage. I asked what the compliance duration periods were, and he stated that the facility uses the number of days in the month to establish the duration. On November 22, 2024, Mr. Zornes

emailed me the VOC usage values from August 2023 through July 2024. The pdf provided in the email was claimed as CBI. The values documented are below the compliance threshold.

Goodyear's Title V operating permit issued on January 18, 2024, states that: "Upon issuance of the Title V permit renewal, Goodyear-Topeka Facility does not perform any sidewall or undertread cementing operations." See potential findings for more information.

40 CFR 60.542 (a)(3) states that for each tread end cementing operation, the facility cannot discharge into the atmosphere more than 0.022 pounds (10 grams) of VOC per tire cemented for each month. While on-site, I asked the facility for the VOC discharge values, and Mr. Zornes emailed me the data. The facility claimed the documents as CBI, but the values from August 2023 through July 2024 were below the 0.022 threshold.

40 CFR 60.542 (a)(4) states that for each bead cementing operation, the facility cannot discharge into the atmosphere more than 0.011 pounds (5 grams) of VOC per bead cemented for each month. While I was on-site, Mr. Garlock and Mr. Zornes stated that the facility does not perform bead cementing.

40 CFR 60.542 (a)(5) (i) &(ii) states that for each green tire spraying operation where only water-based sprays are used, the facility cannot discharge into the atmosphere more than 0.0026 pounds (1.2 grams) and 0.021 pounds (9.3 grams) of VOC per tire sprayed with an inside or outside spray each month respectively. While I was on-site, Mr. Garlock and Mr. Senn stated that the facility's EU-PLUFSA is not in operation. Mr. Senn stated the unit was not on site yet and would arrive during the second quarter of 2025.

While the facility does have a green tire spraying operation, the facility stated it does not have an operation where only organic solvent-based sprays are used per 60.542(a)(6), the facility's paints do not contain more than 12% by weight of VOCs as required by the definition of organic solvent-based spray. During the inspection, I asked Mr. Garlock and Mr. Zornes for the safety data sheet (SDS) for the solvent used in the spray in the EU-PLUFS operation. I reviewed the SDS for the solvent used in the green tire spray operation, and the solvent does contain VOCs. See potential findings for details.

The facility does not have any units for which 40 CFR 60.542(a)(7) applies.

Per 40 CFR 60.543, the facility must follow performance testing and compliance provisions. Goodyear has chosen to follow this requirement by complying with 40 CFR 60.543(b)(4). This states that "In lieu of conducting a monthly performance test, the owner or operator of each tread end cementing operation and each green tire spraying operation shall submit formulation data or the results of Method 24 analysis annually to verify the VOC content of each tread end

cement and each green tire spray material, provided the spraying formulation has not changed during the previous 12 months. If the spray material formulation changes, formulation data or Method 24 analysis of the new spray shall be conducted to determine the VOC content of the spray and reported within 30 days as required under 60.546(j).” During the inspection, I asked for the formulation data, and the facility submitted the SDS for the splice cement and skid cement used in the operations.

40 CFR 60.544 requires the facility to monitor operations. Goodyear’s extruders do not use thermal incinerators, catalytic incinerators, or carbon adsorbers as the control equipment. Since the facility complies with the VOC emission by maintaining the total uncontrolled VOC use to less than or equal to the levels specified in the rule depending on the duration of the compliance period, this monitoring is not applicable to the emission units.

40 CFR 60.545(f) establishes the recordkeeping requirements. The facility must maintain formulation data records. During the site visit, Mr. Garlock and Mr. Zornes were able to provide the formulation data for the tread end cementing and green tire spraying operations.

40 CFR 60.546(g) establishes the reporting requirements. The facility must submit semi-annual reports for demonstrating compliance. Prior to the inspection, I reviewed all the semi-annual reports submitted by the facility from January 1, 2022, through June 30, 2024.

EU: ELIGEN (emergency lighting generator) and ITGEN (IT emergency generator) are subject to Permit Condition K and 40 CFR Part 60 Subpart IIII. The permit conditions have incorporated the federal regulation standards; therefore, references will be made to the CFR citations.

Per 40 CFR 60.4205(b), the facility must comply with the emission standards for all pollutants through 60.4202. The Title V permit states that the engines have been certified to meet this requirement.

40 CFR 60.4207(b) requires the facility to use diesel fuel with a sulfur content less than 15 parts per million. During the inspection, I reviewed purchase records of the fuel and verified the facility was using fuel that met the requirement.

Per 40 CFR 60.4209(a) the facility is required to have a non-resettable hour meter installed on the engine. During the inspection, I saw and took photos of the resettable hour meters.

40 CFR 60.4211 establishes the compliance requirements for the engines. While I was on-site, I reviewed samples of work orders that stated the facility checks the oil, filters, spark plugs, hoses, and belts monthly. Mr. Cox stated the facility uses a third-party contractor to inspect the engines annually. I also reviewed the manufacturer’s manual for the engine. I noted to Messrs. Cox, Garlock, and Zornes that the emergency generators could only be operated for 100 hours

if it was related to testing and maintenance. When I reviewed the paper copies of the data, it showed that the engines ran for maintenance and readiness checks 10-15 minutes per week. Mr. Cox stated that on July 4, 2025, the facility will run the engines for 8-12 hours relating to testing and maintenance. The facility meets the requirements of Subpart ZZZZ by following the requirements in Subpart IIII.

EU: TU01-TU05 & EXTE01 (extruders), A2L201 & A2L202 (strip laminator extruders), MX01 (Mixer #1), BB02-BB09 & BB11 (mixers), PLEM (EM tire spray), PLUFS (green tire spray), PLUFSA (MRT green tire spray), CALWC01 (wire calender), CALAC32 & CALAC35 (laminator and gum calender), CALH23 (4-roll calender), CALL23 (4-roll calendar), ML33, ML35, ML36, & ML38 (mill line), CFM01, CFM02 & CFM05 (mill), IS2D06, IS2D11, IS2D20, & IS2H03 (tire finishings), BAN09, BAN10, & BAN12-14 (band builders), BNSD01 & BNSD02 (band builders), RSX00 & RSX03 (band builder), HEX12 (radial band builder), and UFS01 & UFSO2 (ultra machines) are subject to Permit Condition L and 40 CFR Part 63 Subpart XXXX. The permit conditions have incorporated the federal regulation standards; therefore, references will be made to the CFR citations.

40 CFR 63.5981 identifies the criteria for applicability. Goodyear is applicable to this subpart because it operates a rubber tire manufacturing facility that is located at a major source of HAP emissions. The facility exceeds the major source threshold for nitrogen oxides, sulfur dioxide, carbon monoxide, particulate matter less than 10 microns, HAPs, and VOCs.

40 CFR 63.5984 states that the facility must meet each emission limit in either option 1 or option 2 of Table 1.

40 CFR 63.5985(a)-(c) establishes alternatives that the facility may use to meet the emission limits listed in Table 1. Prior to the inspection, I reviewed the facility's Part 63 Subpart XXXX annual compliance reports from January 1, 2021, through December 31, 2023, and it showed that the facility uses the purchase alternative (63.5985 (a)) to meet the emission limits. The requirement for purchase alternative states that the facility may only use cements and solvents that, as purchased, contain no more HAP than allowed by the emission limits in Table 1 option 1 of Part 63 Subpart XXXX.

Table 1 option 1 states: "emissions of each HAP in table 21 to this subpart must not exceed 1,000 grams HAP per megagram of total cements and solvents used at the tire production affected source and emissions of each HAP not in table 21 to this subpart must not exceed 10,000 grams HAP per megagram of total cements and solvents used at the tire production affected source."

During the inspection, I asked how the facility complies with this requirement, and Mr. Garlock stated the facility submits the annual Subpart XXXX to KDHE and EPA's Central Data Exchange (CDX) site. I pulled the records available for 2022 and 2023 from the CDX site but was not able to verify that all the cements and solvents used were meeting the requirements listed in Table 1 option 1. I have asked Mr. Garlock and Mr. Zornes to send supplemental information for verification. To the date of this report, I have not received this information.

EU: SULA01, SULA02, & FWP05 (diesel generators), ELG01 (emergency gasoline lighting generator) and ELG02 (emergency propane generator) are subject to Permit Condition M and 40 CFR Part 63 Subpart ZZZZ. The permit conditions have incorporated the federal regulation standards; therefore, references will be made to the CFR citations.

Goodyear has five existing generators that are applicable to 40 CFR 63.6602 and 63.6605. The requirements state that the facility must comply with the emission limitations and requirements in Table 2c of Part 63 Subpart ZZZZ. Table 2c states that the facility must operate and maintain engines according to manufacturer's instructions. Mr. Cox told me that the manuals for EU-SULA01 and EU-SULA02 may no longer exist because the engines are older. He also stated that EU-ELG01's manual is from 1940, and the facility does not currently have it on-site. However, the facility follows best industry practices for the three generators that don't have manuals.

Table 2c states that the facility must install non-resettable hour meters on each engine. EU-ELG01 has a meter installed, but the hour meter was not working during the inspection. The hour metered had died at 256.2 hours, with the last record dated as October 5, 2023. The facility personnel began manually writing down the hours the generator operated on March 28, 2024. IMG_0432.JPG (**Appendix A**) is a photo capturing the inoperable non-resettable hour meter for EU-ELG01. See potential findings. Mr. Cox was able to provide the hour meter readings for the other generators.

Table 2c states that the facility must change the oil and filter every 500 hours of operation or annually, whichever comes first. It also states that the facility must inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. For EU-ELG01, the facility must inspect the spark plugs every 1,000 hours of operation or annually, whichever comes first. During the inspection, Mr. Cox provided the work orders to demonstrate that the facility gets the generators inspected yearly. The records showed that EU-SULA01 had not been operational for the most of 2024 and was not operational at all for 2022 and 2023. Mr. Cox stated that EU-SULA01 had started operating again roughly two months before my inspection. He stated no preventative maintenance had been done on the unit. Mr. Cox said

that EU-SULA02 had not been operational for about four or five years due to the fuel pump leak.

40 CFR 63.6640 establishes how the facility will demonstrate continuous compliance. Per 40 CFR 63.6640(f)(3), the facility cannot operate the engines for more than 100 hours when running the engine for maintenance, checks, testing, and voltage deviation periods. During the inspection, Mr. Cox provided the maintenance and testing operational hours for the engines, and it did not exceed the 100-hour threshold.

EU: BLR06-BLR09 (natural gas boilers) are subject to Permit Condition O and 40 CFR Part 63 Subpart DDDDDD.

During the inspection, I did not ask the facility about the tune-ups required by this subpart. Prior to the inspection, I reviewed the semi-annual reports that state the facility has been compliant with Part 63 Subpart DDDDD from January 1, 2022, through June 30, 2024.

EU: BLR09 (natural gas boiler) is subject to Permit Condition Q and 40 Part 60 Subpart Dc.

While I was on-site, I did not ask the facility about the amount of each fuel combusted during the boiler's operation as required by this subpart. Prior to the inspection, I reviewed the semi-annual reports that state the facility has been compliant with Part 63 Subpart DDDDD from January 1, 2022, through June 30, 2024. The reports state that Boiler #9 only combusts natural gas, and the records are kept on a monthly basis.

Potential Finding 1: The facility is required to report and record visible emission observations.
Observation Summary: Data was left blank or incomplete in the monthly visible emission log for January 2022.
Citation: *Permit Condition B (1)(a) and (b)*
Evidence: January 1, 2022 – June 30, 2022, semi-annual report
Description of Observation: The time of observation and status of opacity was not recorded in January 2022 monthly log for Boilers #6 and #7.

Potential Finding 2: Applicability determination
Observation Summary: The facility's Title V operating permit states the facility will not perform specific operations in the future.
Citation: *60.542(a)(1) & 60.542(a)(2) and page 108/119 of Title V permit*
Evidence: CBI documents
Description of Observation: For EU-TU10, Goodyear has been performing undertread cementing operations, and EU-TU04 has been performing sidewall cementing operations.

Potential Finding 2: Applicability determination
The facility's permit states that upon the issuance of the Title V permit renewal, Goodyear-Topeka would not perform those operations. If the facility is not including the operations during its emission calculations, the values may not be accurate.

Potential Finding 3: The facility does not have a non-resettable hour meter for one of its engines.
Observation Summary: The facility is required to install a non-resettable hour meter on each engine.
Citation: *63.6625(f)*
Evidence: Appendix A- photograph 45 (IMG_0432.JPG)
Description of Observation: During the facility tour, I took three photographs showing the inoperable non-resettable hour meter. Mr. Cox also explained that the hour meter had not been operating since October 5, 2023. The facility did not begin accounting for the operation of the generator until March 28, 2024. In the closing conference, Mr. Senn and Mr. Zornes stated that the facility would install new batteries for the hour meter.

Potential Finding 4: Applicability determination
Observation Summary: The facility's Title V operating permit states the facility EU-PLUFS is not subject to Part 60 Subpart BBB
Citation: *page 95/119 in Title V operating permit and 60.542(a)(7)*
Evidence: SDS provided for EU-PLUFS solvent spray
Description of Observation: For EU-PLUFS the Title V permit states that the "paint used will be Chem-Trend ML-6058, which contains up to 10 percent carbon black, contributing to particulate matter emissions. The paint does not contain VOCs or HAPs." During the inspection, the facility personnel also stated the green tire spray solvent doesn't contain any VOCs or HAPs. I asked Mr. Zornes to send me the SDS for the solvent, and the SDS states the solvent does contain VOCs at more than 12% by weight. In the email containing the SDS, Mr. Zornes noted that he was waiting on confirmation from "Jeremy Brown, to confirm, that this is the only product used in EU-PLUFS." I received an email on January 29, 2025, from Mr. Zornes. In the email, Mr. Zornes attached the SDS for Chem-Trend® ML-3124 that is also used in EU-PLUFS. The ML-3124 solvent does not contain any HAPs. Mr. Zornes stated in the email, "In discussion with Jeremy Brown (safety captain in our earth movers business center), ML-3124 is also a product that is used at the PLUFS paint booth."

End of report.