



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

JUL 09 2019

DATE:

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Titan International, Inc. (Titan), Freeport, Illinois

FROM: Victoria Nelson, Environmental Engineer
AECAB (MI/WI)

THRU: Sarah Marshall, Section Chief
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: Titan International, Inc. (Titan)

Facility Location: 3769 US Hwy 20 East, Freeport, Illinois

Date of Inspection: May 16, 2019

EPA Inspectors:

1. Victoria Nelson, Environmental Engineer
2. Greg Gehrig, Environmental Engineer

Other Attendees:

1. Steve Strauss, Titan, General Manager (closing conference only)
2. Ken Thompson, Fehr Graham Engineering and Environmental, Principal/Environmental Division Manager
3. Bart Knutson, Titan, Mechanical Engineer

Contact Email Address: Steve.Strauss@titan-intl.com; Kthompson@fehr-graham.com

Purpose of Inspection: To evaluate compliance with the Clean Air Act and the facility's Title V permit

Facility Type: Industrial tire manufacturing

Regulations Central to Inspection: NSPS Subpart BBB, Standards of Performance for the Rubber Tire Manufacturing Industry

Arrival Time: 9:15 AM Central Time

Departure Time: 11:40 AM Central Time

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from the attendees unless otherwise noted.

Company Ownership: Titan bought the facility in 2006.

Process Description:

Titan operates a rubber tire manufacturing facility that produces agricultural and industrial tires. Carbon black, rubber, and various other components are mixed together in proportions dependent on desired tire properties. The facility has seven mixers, but usually only operates two mixers at a time. Upon leaving the mixers, the products are sent through an extruder where they are heated and run through a tuber to mold into the desired shape. After extrusion, a solvent-based cement is applied at the tread ends. Additional components are cut into proper dimensions. Steel beads are used to form a tire outline which is then wrapped in rubber strips. Components are then sent to a tire assembly room where automated machines assemble a base, plain tire referred to as a 'green tire.' Green tires are then sent for curing in which the tire enters a mold where they are baked into their final form.

Staff Interview: The facility has approximately 375 employees and operates parts of the plant with 3 shifts over 24 hours for seven days a week. Titan had received a Prevention of Significant Deterioration Permit to produce organo-silane rubber. Due to changes in operations at the facility and decline in demand, the facility stopped producing organo-silane rubber in 2012 or 2014. Titan plans to remove the associated requirements from its Title V permit. Titan moved some of its mixers to its facility in Union City.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

EPA inspectors observed mixing, tread-end cementing, beading, and curing operations during the inspection.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

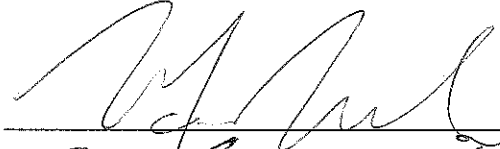
- Facility diagram

CLOSING CONFERENCE

Requested documents:

- 2017, 2018 Cured Rubber Throughput
- 2018 Air Emissions Records
- Permit information, including process description and process flow diagrams

SIGNATURES

Report Author:  Date: 7/9/19

Section Chief:  Date: 7/9/19

Facility Name: Titan International, Inc. (Titan)
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APPENDICES AND ATTACHMENTS

- Appendix A: Digital Image and Video Log

Facility Name: Titan International, Inc. (Titan)
Facility Location: 3769 US Hwy 20 East, Freeport, Illinois
Date of Inspection: May 16, 2019

APPENDIX A: DIGITAL IMAGE AND VIDEO LOG

1. Inspector Name: Victoria Nelson	2. Date of Inspection: May 16, 2019
3. Company/Facility Name: Titan International, Inc. (Titan)	4. Street Address, City, State: 3769 US Hwy 20 East, Freeport, Illinois
5. Number of Images and Videos: 7	6. Archival Record Location: C:\Users\Vnelson\OneDrive - Environmental Protection Agency (EPA)\Targeting and Inspections\Titan Tire

Video Number	File Name	Date and Time (CST)	Description of Video
1	MOV_2427.mp4	5/16/2019 10:55 AM	Emissions from beading operations
2	MOV_2428.mp4	5/16/2019 11:00 AM	Emissions from active curing units

Image Number	File Name	Date and Time (CST)	Description of Image
1	IMG_0217.JPG	2019:05:16 10:37:26 AM	Mixing area
2	IMG_0218.JPG	2019:05:16 10:48:35 AM	Tread-end cementing
3	IMG_0219.JPG	2019:05:16 11:02:26 AM	Blurred image quality
4	IMG_0220.JPG	2019:05:16 11:04:33 AM	Spray booth
5	IMG_0221.JPG	2019:05:16 11:06:53 AM	Curing unit