



DEPARTMENT ORDER

**The Goodyear Tire & Rubber Company
Cumberland County
Westbrook, Maine
A-1037-71-E-N/A**

**Departmental
Findings of Fact and Order
Air Emission License
After-the-Fact Renewal and
After-the-Fact Amendment**

FINDINGS OF FACT

After review of the air emission license amendment and renewal application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes (M.R.S.) § 344 and § 590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

The Air Emission License for The Goodyear Tire & Rubber Company (Goodyear) expired on September 14, 2025. Goodyear applied after that date to renew their license for the operation of emission sources associated with their tire retreading facility.

Goodyear has requested an after-the-fact amendment to their license in order to add an existing burn-off oven not previously addressed in the license and to correct the capacities of several pieces of process equipment.

The equipment addressed in this license is located at 39 Thomas Drive, Westbrook, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Fuel Burning Equipment

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type	Date of Manuf.	Date of Install.	Stack #
Oven 1 ^A	2.4	2,400 scf/hr	Natural Gas	2010	2010	1
EU2 ^B	0.175	200 scf/hr	Natural Gas	2025	2025	Fugitive

^A After-the-fact addition to the license

^B Insignificant activity, included for completeness only

Process Equipment

Equipment	Equipment Description	Production Rate	Date of Install.	Pollution Control Equipment
TB1	Tire Buffer #1	20 tires/hr	2010	Blower to Buffed Rubber Trailer & Water Mister
TB2	Tire Buffer #2	20 tires/hr	2010	Blower to Buffed Rubber Trailer & Water Mister
EXT1	Cushion Gum Rubber Extruder	3.5 lbs rubber/tire, 60 tires/hr	2010	N/A
CO1	Tire Curing Oven 1	23 tires/cycle	2010	N/A
CO2	Tire Curing Oven 2	25 tires/cycle	2010	N/A
PB1	Tire Painting Booth	80 tires/hr	2010	Air Filter
SB1	Wheel Rim Sandblaster	60 rims/hr	2010	Cartridge Filter
PCB1	Wheel Rim Powder Coating Booth	30 rims/hr	2010	Cartridge Filter
BR Trailer	Buffed Rubber Trailer	N/A	2010	Air Filter

C. Definitions

Compound #6 means the rubber described as Tire Tread (Styrene Butadiene Rubber / Polybutadiene Rubber) in AP-42 Ch. 4.12, which is the composition of the particular rubber compound used by Goodyear for their tire retreading process.

Rim means the metal portion of a wheel the tire has been mounted to.

Records or Logs mean either hardcopy or electronic records.

Tire means the rubber portion of an automobile or truck wheel.

D. Application Classification

All rules, regulations, or statutes referenced in this air emission license refer to the amended version in effect as of the date this license was issued.

The previous air emission license for Goodyear expired on September 14, 2025. A complete application was not submitted prior to the expiration date; therefore, Goodyear is considered to be an existing source applying for an after-the-fact renewal. Goodyear has also applied to amend their license as addressed in Section I(A) above.

The modification of a minor source is considered a major or minor modification based on whether or not expected emission increases exceed the “Significant Emissions” levels as

defined in the Department's *Definitions Regulation*, 06-096 Code of Maine Rules (C.M.R.) ch. 100. The emission increases are determined by subtracting the current licensed annual emissions preceding the modification from the maximum future licensed annual emissions, as follows:

Pollutant	Current License (tpy)	Future License (tpy)	Net Change (tpy)	Significant Emissions Levels
PM	0.8	1.5	+0.7	100
PM ₁₀	0.8	1.5	+0.7	100
PM _{2.5}	-	1.5	-	100
SO ₂	0	0.1	+0.1	100
NO _x	0	1.0	+1.0	100
CO	0	5.2	+5.2	100
VOC	1.9	2.3	+0.4	50*

* Goodyear is located in an area of the state included in the Ozone Transport Region. Therefore, the significant emission level for VOC is 50 tpy.

Therefore, this license is considered to be both an after-the-fact renewal and an after-the-fact minor modification and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules C.M.R. ch. 115.

E. Facility Classification

The facility is licensed as follows:

- As a natural minor source of criteria pollutants, because no license restrictions are necessary to keep facility emissions below major source thresholds for criteria pollutants; and
- As an area source of hazardous air pollutants (HAP), because the licensed emissions are below the major source thresholds for HAP.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 C.M.R. ch. 100. Separate control requirement categories exist for new and existing equipment.

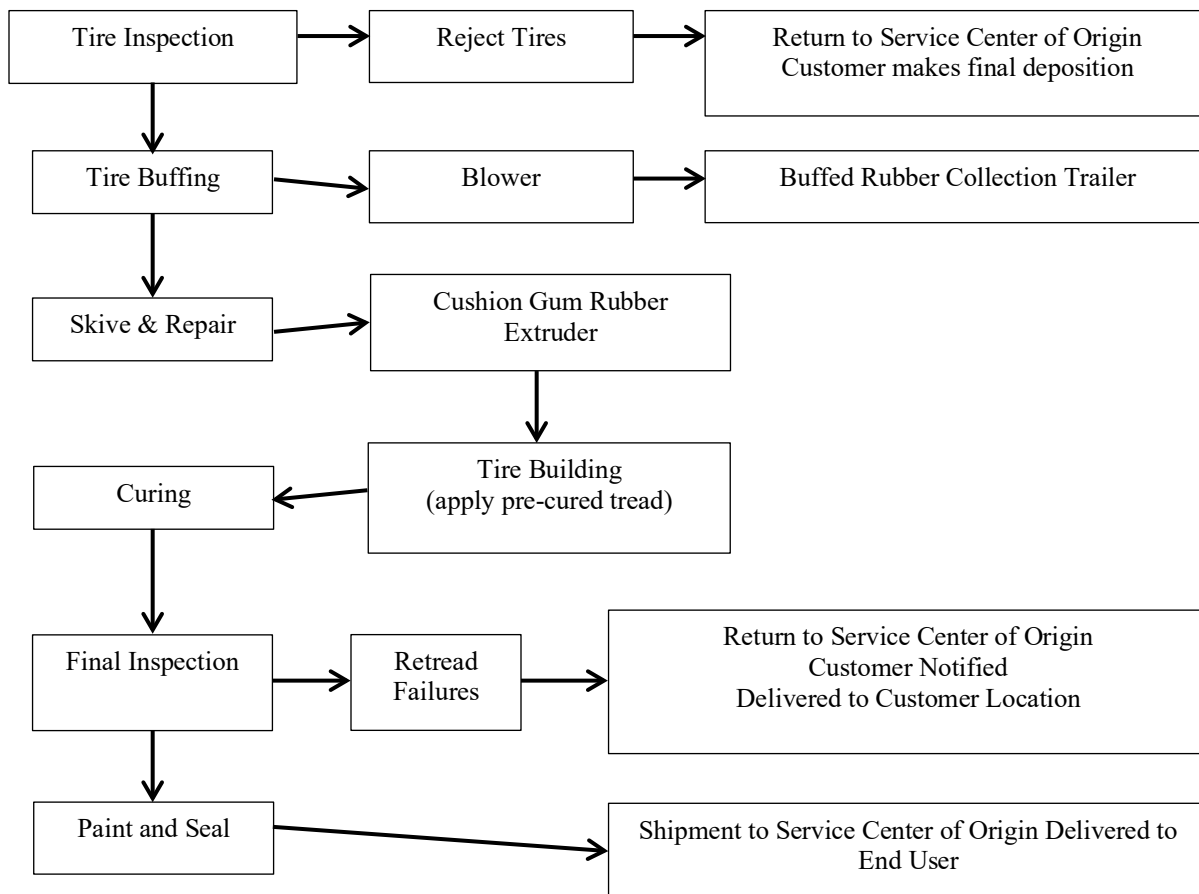
BPT for an after-the-fact renewal requires an analysis similar to a Best Available Control Technology analysis pursuant to 06-096 C.M.R. ch. 115.

B. Process Description and Small Emission Sources Descriptions

Goodyear operates two processes containing multiple steps at their facility: tire retreading and rim refinishing.

1. Tire Retreading Process

Process Flow Chart – Tire Retreading



a. Tire Buffing

The tire buffing process removes old tread in preparation for retreading. Goodyear’s facility is equipped with two Mattuzi 98E Tire Buffers, TB1 and TB2, equipped with water misters and connected to a blower and recycle collection trailer. One tire buffer is used as a stand-by unit in the event the primary buffer fails due to mechanical issues.

The buffing process is referred to as buffing, rasping, and carcass grinding, depending on which entity is referring to it. Although Goodyear operates Tire Buffing machines, the process as described appears closer to AP-42's carcass grinding definition, where rubber is aggressively removed from the tire body using rasping knives.

A water mister is mounted on each tire buffer to control visible emissions and the temperature of the knives during the rasping process. Rubber material removal is accomplished by the blower creating a vacuum/suction at the point of tire and rasp contact. The material is pulled into the blower and collected in the rubber recycle trailer for transport, removal, and recycle off-site. The rubber particle control/collection system is an integral part of the tire buffing process. This blower collection system facilitates the movement of the buffed rubber material away from the buffing machine; without this equipment, the buffer would quickly plug due to the accumulation of buffed material. The buffing machines cannot operate in production mode without the blower being operational.

In license A-1037-71-B-M (issued on August 15, 2013), Goodyear modified their rubber recycle trailer to utilize a filter with 32 square feet of filtration surface, made from 100-micron filtration material, and reusable by use of a zipper, to be opened for emptying and inspection during cleanout.

Based on information from a previous license, 14.05 lbs of rubber is removed per tire, and expected PM capture and control efficiency is 99.95%. The following emission factors for carcass grinding are from AP-42 Ch. 4.12 dated 11/08:

- PM^A – 0.000273 lb per lb rubber removed based on AP-42 factor and 99.95% control
- VOC – 0.000521 lb per lb rubber removed
- Single HAP – 0.0000265 lb 1,3-butadiene per lb rubber removed
- Total HAP – 0.000127 lb per lb rubber removed

^A AP-42 addressed PM only collected using Method 5, so no data is available for PM₁₀ or PM_{2.5}.

The BPT emission limits for TB1 and TB2 combined are the following:

Unit	PM (lb/hr)	VOC (lb/hr)	Single HAP (lb/hr)	Total HAP (lb/hr)
TB1 & TB2	0.15	0.29	0.01	0.07

BPT for visible emissions from TB1 and TB2 each has been established in license A-1037-71-A-N (issued on 06/30/2010) as not to exceed 10% opacity on a six-minute block average basis.

b. Skive and Repair

Skive and repair describes the process where more intrusive cutting and tire repair is needed before the retread process continues. Any damaged material must be cut away (skived) and then several compounds are used to repair the damage before the retread can be applied. Emissions are described in Miscellaneous Process Source Emissions below.

c. Cushion Gum Rubber Extruder

Goodyear utilizes an AZ Extruder Retrax 6011 machine, EXT1, to extrude up to a 3.5 lb slab of cushion gum rubber onto the buffed tread surface. The cushion gum rubber is a thin layer of rubber extruded onto the surface of the tire before the retread is applied to ensure a uniform surface is created around the tire and to provide total coverage of the wire mesh interior, possibly exposed from the buffing process. The extruder emits fugitive VOC and HAPs. The extruder does not exhaust outdoors, and, as such, is not subject to PM emission requirements.

The following emission factors for extrusion of Compound #6 are from AP-42 Ch. 4.12 dated 11/08:

- VOC – 0.0000123 lb per lb of rubber extruded
- Single HAP – 0.0000132 lb Methylene Chloride per lb of rubber extruded
- Total HAP – 0.0000352 lb per lb of rubber extruded

The BPT emission limits for EXT1 are:

Unit	VOC (lb/hr)	Single HAP (lb/hr)	Total HAP (lb/hr)
EXT1	-	-	0.01

d. Tire Building

Tires receive a layer of “Precure” tread material, which is applied on the tacky extruded uncured cushion gum rubber using retread cement to ensure adhesion. The assembled tires are then cured in one of two electric autoclave-type curing chambers. Emissions from application of the retread cement are described in Miscellaneous Process Source Emissions below.

e. Curing (Electric Autoclaves)

One autoclave/cure chamber (CO1) processes a maximum of 23 tires per batch and takes approximately 3 hours to fully cycle. The other autoclave/cure chamber (CO2) processes a maximum of 25 tires per batch and takes approximately 3.5 hours to fully cycle. The cure chambers cure an average of 3.5 lbs of uncured rubber material per tire. There are minor fugitive VOC and HAP emissions whenever the cure chamber is opened at the end of a batch. There are no PM emissions from this type of curing.

The following emission factors for curing Compound #6 are from AP-42 Ch. 4.12 dated 11/08:

- VOC – 0.000129 lb per lb of rubber extruded
- Single HAP – 0.0000135 lb per lb of rubber extruded
- Total HAP – 0.0000673 lb per lb of rubber extruded

The BPT emission limits for CO1 and CO2 combined are the following:

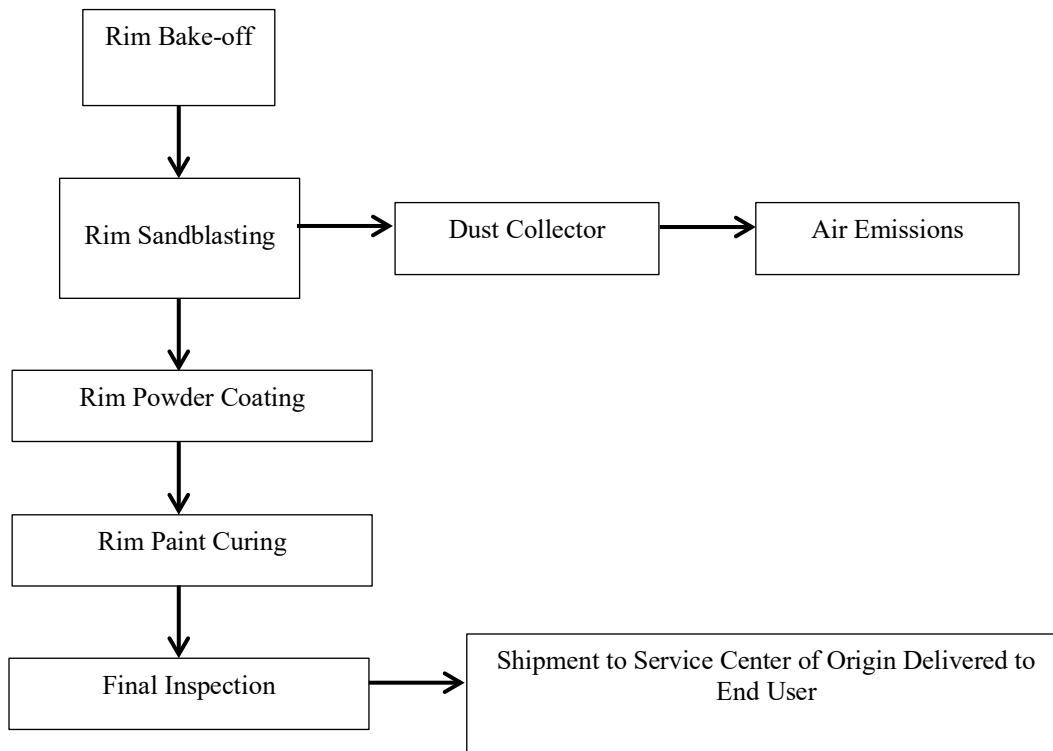
Unit	VOC (lb/hr)	Single HAP (lb/hr)	Total HAP (lb/hr)
CO1 & CO2	0.01	-	-

f. Tire Painting

A finish of Myers Tire Paint (water-based) is sprayed on the sidewalls of each retreaded tire. The paint is sprayed in a Tire Paint Spray Booth (PB1). Based on the Safety Data Sheet (SDS) for the tire paint, the paint does not contain VOC or HAP. The spraying process does not use compressed air for atomization. PB1 is equipped with air filtration, which is not vented outside. Since PB1 vents inside the building, it is an insignificant activity.

2. Rim Refinishing

Process Flow Chart – Rim Refinishing



a. Rim Bake-off/Oven 1

Oven 1 and associated afterburner include two 1.2-MMBtu/hr burners (total of 2.4 MMBtu/hr) which fire natural gas. The oven can service 96 rims per cycle and is operated for one cycle each day. Due to the oven being capable of running more than a single cycle per day, a scale up factor of approximately 43% was applied. Removal of material is accomplished by heating the materials to be stripped to approximately 800 °F. Emissions produced from the material burn-off are vented through an afterburner chamber operated at a temperature of 1,500 °F or higher. The afterburner chamber is believed to reduce the VOC emission by 95% compared to an uncontrolled bake-off. Estimated paint to be removed in this oven prior to sandblasting is 0.2 lbs per rim. From the paint removed in the bake-off oven, it is described as 6% PM, 87% CO, and 7% VOC. The actual tested values from a previous study of the oven emissions, were slightly different in the ratio provided, but it likely included some content from the combustion of the fuel gas during the test (modified results are documented in the Department’s files under BBO Study Further Analysis).

(1) BACT Findings

The BACT emission limits for Oven 1 were based on the following:

Paint Bake-Off

- PM/PM₁₀/PM_{2.5} – 6.86 x 10⁻² lb/hr based on source provided test data
- CO – 9.94 x 10⁻¹ lb/hr based on source provided test data
- VOC – 8.00 x 10⁻² lb/hr based on source provided test data

Natural Gas

- PM/PM₁₀/PM_{2.5} – 0.05 lb/MMBtu based on 06-096 C.M.R. ch. 115, BPT
- SO₂ – 0.6 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
- NO_x – 100 lb/MMscf based on AP-42 Table 1.4-1 dated 7/98
- CO – 84 lb/MMscf based on AP-42 Table 1.4-1 dated 7/98
- VOC – 5.5 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
- Visible Emissions – 06-096 C.M.R. ch. 115, BACT

The BACT emission limits for Oven 1 are the following:

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	PM _{2.5} (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Oven 1	0.19	0.19	0.19	-	0.23	1.19	0.09

(2) Visible Emissions

Visible emissions from Oven 1 shall not exceed 10% opacity on a six-minute block average basis.

b. Rim Sandblasting

After exiting the burn-off oven, rims are sandblasted in an enclosed Rim Blaster RBX-Mod shot blasting machine, SB1. Particulate matter emissions are controlled by cartridge-type dry filters with an efficiency of 99.9% for 0.5-micron particles. The machine has a maximum throughput rate of 60 rims per hour. The cartridge-type dry filters exhaust outside the building via a horizontal exhaust.

AP-42 provides the following uncontrolled emission factors:

- PM – 27 lb/1,000 lb abrasive based on AP-42 Ch. 13.2.6, Table 1, dated 9/97
- PM₁₀ – 13 lb/1,000 lb abrasive based on AP-42 Ch. 13.2.6, Table 1, dated 9/97
- PM_{2.5} – 1.3 lb/1,000 lb abrasive based on AP-42 Ch. 13.2.6, Table 1, dated 9/97

Based on 17,000 lb of abrasive material used over 3,150 hours of operation per year and using the 99.9% efficient filters, the emission rates for all PM are estimated at below 0.01 tons per year.

BPT for Rim Sandblasting was found to be use of cartridge-type dry filters and a visible emissions limit of 10% opacity on a six-minute block average basis, established in license A-1037-71-A-N (issued on 06/30/2010).

c. Rim Powder Coating

The rim powder coating booth has a cartridge-type filter with an efficiency of 99.7% for 0.5-micron particles. The rim powder coating process uses an electrostatic process to mitigate PM emissions from overspray. Based on the SDS for the Interpon 610 IMI Wheel White used to coat rims, the material contains no VOC or HAPs. The powder coating booth does not exhaust to the outdoors, and, as such, is not subject to PM emission requirements.

d. Rim Paint Curing

After being cured, the rims are briefly cured in a custom-built electric oven. No emissions are associated with this process, due to the curing of non-VOC and zero-HAP-containing material.

C. Miscellaneous Process Source Emissions

Skive and Repair, Tire Building, Tire Painting, and Rim Coating are all processes that, in the past, have used materials containing VOC and HAPs. According to the current SDSs provided with the renewal application, none of the materials currently used in these processes contain HAPs, and the painting and coating materials no longer contain VOC.

BPT for Skive and Repair and Tire Building is monthly record keeping of the amount of materials used and the VOC and HAP content of those materials. Monthly material use reports are to be completed from daily production reports and end-of-month inventory inspections. Goodyear shall calculate VOC and HAP emissions from these records for Skive and Repair and Tire Building in pounds per month.

Goodyear shall calculate VOC and HAP emissions in pounds per month, based on the emission rates identified in Section B above for Tire Buffing, Cushion Gum Rubber Extrusion, and Curing in the electric autoclaves, based on the actual number of tires run through each process on a monthly and calendar year basis.

Goodyear shall calculate and maintain monthly and calendar year totals of VOC and HAP emissions from the identified miscellaneous process sources.

Goodyear had a licensed facility-wide limit of 1.9 tons per year of VOC. During this license renewal, a more accurate accounting of emissions was conducted, and this limit is found to be too constrained. Based on current usage of sealants and cements, Goodyear uses less than 0.3 tons per year of VOC. As such, instead of a facility-wide limit on VOC, Goodyear has agreed to a limit of 0.6 tons per year of VOC from sealant and cement coatings.

Goodyear also had a facility-wide HAP limit of 0.31 tons per year for a single HAP and 0.34 tons per year of total HAP emissions. After reviewing emission sources more thoroughly, these limits also seem too constrained. The tire buffing process alone produces total HAP emissions of approximately 0.31 tons per year. These values have been increased to 0.5 tons per year for a single HAP and 1.0 tons per year for total HAP to more accurately represent worst case HAP emissions from this facility.

D. General Process Emissions

Visible emissions from any general process source previously not described in this license shall not exceed 20% opacity on a six-minute block average basis.

E. Fugitive Emissions

Goodyear shall not cause emissions of any fugitive dust during any period of construction, reconstruction, or operation without taking reasonable precautions. Such reasonable precautions shall be included in the facility's continuing program of best management practices for suppression of fugitive particulate matter. See 06-096 C.M.R. ch. 101, § 4(C) for a list of potential reasonable precautions.

Goodyear shall not cause or allow visible emissions within 20 feet of ground level, measured as any level of opacity and not including water vapor, beyond the legal boundary of the property on which such emissions occur. Compliance with this standard shall be determined pursuant to 40 C.F.R. Part 60, Appendix A, Method 22.

F. Annual Emissions

The table below provides an estimate of facility-wide annual emissions for the purposes of calculating the facility's annual air license fee and establishing the facility's potential to emit (PTE). Only licensed equipment is included, i.e., emissions from insignificant activities are excluded. Similarly, unquantifiable fugitive particulate matter emissions are not included except when required by state or federal regulations. Maximum potential emissions were calculated based on operating all of the equipment for 8,760 hr/yr.

This information does not represent a comprehensive list of license restrictions or permissions. That information is provided in the Order section of this license.

Total Licensed Annual Emissions for the Facility
Tons/year
 (used to calculate the annual license fee)

	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	CO	VOC
Oven 1	0.8	0.8	0.8	-	1.0	5.2	0.4
TB1 and TB2	0.7	0.7	0.7	-	-	-	1.3
Cements and Sealers	-	-	-	-	-	-	0.6
Total TPY	1.5	1.5	1.5	0.1 *	1.0	5.2	2.3

* Because the estimated emissions are small but not zero, this value is rounded to the nearest tenth of a ton.

Pollutant	Tons/year
Single HAP	0.5
Total HAP	1.0

III. AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source is determined by the Department on a case-by-case basis. In accordance with 06-096 C.M.R. ch. 115, an ambient air quality impact analysis is not required for a minor source if the total licensed annual emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

Pollutant	Tons/Year
PM ₁₀	25
PM _{2.5}	15
SO ₂	50
NO _x	50
CO	250

The total licensed annual emissions for the facility are below the emission levels contained in the table above and there are no extenuating circumstances; therefore, an ambient air quality impact analysis is not required as part of this license.

This determination is based on information provided by the applicant regarding licensed emission units. If the Department determines that any parameter (e.g., stack size, configuration, flow rate, emission rates, nearby structures, etc.) deviates from what was included in the application, the Department may require Goodyear to submit additional information and may require an ambient air quality impact analysis at that time.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-1037-71-E-N/A subject to the following conditions.

Severability. The invalidity or unenforceability of any provision of this License or part thereof shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (38 M.R.S. § 347-C).
- (2) The licensee shall acquire a new or amended air emission license prior to beginning actual construction of a modification, unless specifically provided for in Chapter 115. [06-096 C.M.R. ch. 115]
- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [06-096 C.M.R. ch. 115]
- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 C.M.R. ch. 115]
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S. § 353-A. [06-096 C.M.R. ch. 115] Payment of the annual air

emission license fee for Goodyear is due by the end of May of each year. [38 M.R.S. § 353-A(3)]

- (6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 C.M.R. ch. 115]
- (7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 C.M.R. ch. 115]
- (8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [06-096 C.M.R. ch. 115]
- (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [06-096 C.M.R. ch. 115]
- (10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [06-096 C.M.R. ch. 115]
- (11) In accordance with the Department's air emission compliance test protocol and 40 C.F.R. Part 60 or other method approved or required by the Department, the licensee shall:
 - A. Perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
 1. Within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
 2. Pursuant to any other requirement of this license to perform stack testing.
 - B. Install or make provisions to install test ports that meet the criteria of 40 C.F.R. Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

- C. Submit a written report to the Department within thirty (30) days from date of test completion.
[06-096 C.M.R. ch. 115]
- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
- A. Within thirty (30) days following receipt of the written test report by the Department, or another alternative timeframe approved by the Department, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 C.F.R. Part 60 or other method approved or required by the Department; and
- B. The days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
- C. The licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.
[06-096 C.M.R. ch. 115]
- (13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or license requirement. [06-096 C.M.R. ch. 115]
- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emissions and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 C.M.R. ch. 115]
- (15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and

in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 C.M.R. ch. 115]

- (16) The licensee shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S. § 605). [06-096 C.M.R. ch. 115]

SPECIFIC CONDITIONS

(17) **Oven 1**

A. Oven 1 shall fire only natural gas. [06-096 C.M.R. ch. 115, BACT]

B. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BACT]:

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	PM _{2.5} (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Oven 1	0.19	0.19	0.19	-	0.23	1.19	0.09

C. Visible emissions from Oven 1 shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

(18) **TB1 and TB2**

A. Particulate matter (PM) emissions shall be controlled from TB1 and TB2 by use of a water mister and a blower system to transport rubber scrap and PM to the trailer. [06-096 C.M.R. ch. 115, BPT]

B. Visible emissions from TB1 and TB2 shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

(19) **Buffed Rubber Trailer**

A. Goodyear shall operate and maintain a filter on the Buffed Rubber Trailer to meet the visible emission requirements. The filter shall be inspected at least once per month, and records of the inspection are to be maintained. [06-096 C.M.R. ch. 115, BPT]

B. Visible emissions from the Buffed Rubber Trailer shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

(20) **Rim Sandblasting**

- A. PM emissions shall be controlled from Rim Sandblasting by use of an enclosure and cartridge filters. [06-096 C.M.R. ch. 115, BPT]
- B. Visible emissions from Rim Sandblasting shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

(21) **Miscellaneous Process Source Emissions**

- A. Goodyear shall calculate the VOC and HAP emissions from the records for Skive and Repair and Tire Building in pounds on a monthly basis.
- B. Based on the emission rates identified in Section B of Findings of Fact, Goodyear shall calculate the VOC and HAP emissions for Tire Buffing, Cushion Gum Rubber Extrusion, and Curing in the electric autoclaves, based on the number of tires run through each process on a monthly basis.
- C. Goodyear shall not exceed a VOC emission rate of 0.6 tons per year from the Skive and Repair operations and Tire Building operations, on a calendar year basis. VOC emissions shall be calculated and records maintained on a monthly and calendar year total basis. [06-096 C.M.R. ch. 115, BPT]
- D. Goodyear shall not exceed a facility-wide single HAP emission rate of 0.5 ton per year on a calendar year basis or a total HAP emission rate of 1.0 ton per year on a calendar year basis. HAP emissions shall be calculated and records maintained on a monthly and calendar year total basis. [06-096 C.M.R. ch. 115, BPT]

(22) **General Process Sources**

Visible emissions from any general process source not previously described in this license shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

(23) **Fugitive Emissions**

- A. Goodyear shall not cause emissions of any fugitive dust during any period of construction, reconstruction, or operation without taking reasonable precautions. Such reasonable precautions shall be included in the facility's continuing program of best management practices for suppression of fugitive particulate matter. See 06-096 C.M.R. ch. 101, § 4(C) for a list of potential reasonable precautions.
- B. Goodyear shall not cause or allow visible emissions within 20 feet of ground level, measured as any level of opacity and not including water vapor, beyond the legal

boundary of the property on which such emissions occur. Compliance with this standard shall be determined pursuant to 40 C.F.R. Part 60, Appendix A, Method 22.

[06-096 C.M.R. ch. 101, § 4(C)]

(24) **Additional Information**

If the Department determines that any parameter value pertaining to construction and operation of the emissions units, including but not limited to stack size, configuration, flow rate, emission rates, nearby structures, etc., deviates from what was submitted in the application or ambient air quality impact analysis for this air emission license, Goodyear may be required to submit additional information. Upon written request from the Department, Goodyear shall provide information necessary to demonstrate AAQS will not be exceeded, potentially including submission of an ambient air quality impact analysis or an application to amend this air emission license to resolve any deficiencies and ensure compliance with AAQS. Submission of this information is due within 60 days of the Department's written request unless otherwise stated in the Department's letter.

[06-096 C.M.R. ch. 115, § 2(O)]

DONE AND DATED IN AUGUSTA, MAINE THIS 22nd DAY OF APRIL, 2026.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for
MELANIE LOYZIM, COMMISSIONER

The term of this license shall be ten (10) years from the signature date above.

[Note: If a renewal application, determined as complete by the Department, is submitted prior to expiration of this license, then pursuant to Title 5 M.R.S. § 10002, all terms and conditions of the license shall remain in effect until the Department takes final action on the license renewal application.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: February 9, 2026
Date of application acceptance: February 10, 2026

This Order prepared by Zac Hicks, Bureau of Air Quality.