

ENVIRONMENTAL PROTECTION COMMISSION OF  
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

Todd Tyler  
VP Operations  
Wingfoot Commercial Tire Systems, LLC  
1000 South 21<sup>st</sup> Street  
Fort Smith, AR 72901

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File No.: 0570405-006-AO  
County: Hillsborough

Enclosed is Renewal Permit Number 0570405-006-AO to operate a tire retreading facility, issued pursuant to Section 403.087, Florida Statutes. Please read this new permit thoroughly as there are changes from the previous permit.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of receipt of this permit. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to

request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the F.A.C.

A petition that disputes the material facts on which the EPC's action is based is required to contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number if known;
- (b) The name, address, and telephone number of the petitioner and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;
- (c) A statement of how and when the petitioner received notice of the EPC action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the EPC's proposed action;
- (f) A statement of specific rules or statutes that the petitioner contends requires reversal or modification of the EPC's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the EPC that are relevant to the permit decision. Interested persons may contact Stephen Hathaway, P.E., at the above address or call (813) 627-2600, for additional information.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Drive, Tampa, Florida 33619 and with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION  
COMMISSION OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.  
Executive Director

RDG/KRZ/krz

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on \_\_\_\_\_ to the listed persons.

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the clerk, receipt of which is hereby acknowledged.

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clerk

Date

PERMITTEE:

Wingfoot Commercial Tire Systems, LLC  
1000 South 21<sup>st</sup> Street  
Fort Smith, AR 72901

PERMIT/CERTIFICATION

Permit No: 0570405-006-AO  
County: Hillsborough  
Expiration Date: March 13, 2017  
Project: Tire Retreading Operation

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the EPC and made a part of hereof and specifically described as follows:

Wingfoot Commercial Tire Systems, LLC operates a tire retreading facility. Worn tires received for retreading are inspected for defects on one of two machines, where some hand buffing, hole drilling, and plugging occurs as they are prepared for buffing. The tires are sorted and then buffed individually on one of two automatic buffing machines (Cahill Buffer Model KW-30-SD and Matteuzzi Buffer Model RAS 98-E), which use metal rasps to remove the residual worn tread. The buffed tires are then moved to the AZ Extruder machine where they are coated with a layer of rubber in preparation to receive tread. An electric heating element provides the heat for this process. After being coated with rubber, new tread is applied in one of two machines (Builder Matteuzzi Model RES 505 and Builder Matteuzzi Model 850). An inner tube-like liner, the “envelope”, is then wrapped around each tire and each tire is inserted into one of two Salisbury Chamber ovens. Inside the chambers, the rubber adheres the tread to the tire and is vulcanized (cured) under elevated temperature and pressure (approximately 260°F for 3 hours). A 50 HP (1.6 MMBtu/hr) Parker natural gas-fired boiler supplies heat for the two ovens. The boiler is exempt from permitting under the Rule 62-210.300(3)(a)33., F.A.C.

After curing, tires are mounted on a Matteuzzi G-100 inflator to inspect and check for defects and leaks. The exterior of the tires are then coated with a low-VOC water-based paint in an Atec Insta-spect machine with a self-contained filter to capture overspray. The tire painting operation is exempt from permitting under the Rule 62-210.300(a)24., F.A.C. since the coating contains less than 5% VOC by volume. Records of usages of paints, adhesives, and solvents are not required as part of this permit, but an annual consumption inventory should be maintained to ensure that potential increases in usages do not cause an exceedance of the threshold for the exempt designation.

Also located within the building, in a mostly enclosed garage area, is a wheel and rim reconditioning operation. Used steel wheels and rims are grit blasted using iron shot to prepare the surface for coating. A maximum of two wheels or rims at a time are grit blasted in a completely enclosed Rim-Kleen Wheel Machine grit blasting machine. The blasted material is directed to a small baghouse which vents indoors and is collected in a drum. The wheels and rims are then wiped clean and placed in a partially enclosed spray booth with particulate filters on the collection system that vents into the room. A powder coating is then electrostatically applied to the wheels and rims in the spray booth. After coating, the wheels and rims are exposed to approximately 600°F for about 3-5 minutes in an electric oven to cure the coating. The wheel and rim blasting operation is considered insignificant because of its low emissions and exhaust into the predominantly enclosed room. In addition, the wheel and rim coating operation is exempt from permitting under the Rule 62-210.300(3)(a)24., F.A.C. since the coating contains no VOC by volume.

Particulate matter emissions generated from the buffing operations are controlled by a custom built Piedmont Metal Services and Scamardo Metal Fabricators 15 HP fan that collects the rubber particulates and discharges them directly into a vented trailer that acts as a settling chamber. The air flow of the fan is approximately 3,400 ACFM. The facility is exempt from PM RACT Rule 62-296.700, F.A.C. for the tire retreading operation by limiting the buffing operation hours.

Location: 1325 Massaro Blvd., Tampa, FL 33619

UTM: 17-366.4 E 3093.2 N NEDS NO: 0405

Emission Unit No. 002 - Tire Retreading

Replaces Permit No.: 0570405-005-AO

References Permit No.: AC29-259430

SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]
2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]
3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]
4. In order to exempt the facility from Particulate RACT, the maximum allowable particulate matter (PM) emissions from the facility in total shall not exceed more than 4.4 pounds in any given hour and 10.3 tons in any 12 consecutive month period. [Rule 62-296.700(2)(a), F.A.C. and Permit No. AC29-259430]
5. The permittee shall not cause, let, permit, suffer, or allow to be discharged into the atmosphere any air pollutants from the retreading operation, the opacity of which is equal to or greater than 5% opacity. [Rule 62-4.070(3), F.A.C. and Rule 1-3.52, Rules of the EPC]
6. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320, F.A.C.]
7. In order to ensure compliance with the emission limitations in Specific Condition Nos. 4, 5 and 6 the following restrictions shall apply: [Rule 62-4.070(3), F.A.C. and Permit No. AC29-259430]
  - A) Process rate of tire grinding/buffing: 28 tires per hour
  - B) Amount of material buffed: Approximately 16 pounds per tire
  - C) All dust laden air from the buffing operation shall be collected and discharged directly to a vented trailer.
  - D) The hours of operation for the buffing operation shall not exceed 4,680 hours for any 12 consecutive month period.
  - E) All paint used in coating the tires, wheels, and rims shall be water-based.
8. Test the exhaust from the collection trailer for visible emissions once per federal fiscal year (October 1 – September 30). The Method 9 test observation period on this source shall be at least thirty (30) minutes and shall be conducted under the operating conditions specified in Specific Condition No. 10. Two copies of the test data shall be submitted to the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of testing. [Rule 62-297.310 and 62-4.070(3), F.A.C.]
9. Compliance with the emission limitations of Specific Condition No. 5 shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. [Rule 62-297, F.A.C.]

SPECIFIC CONDITIONS:

10. Testing of emissions from the buffing operation shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of the buffing rate of 28 tires/hr. If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. At no time is the buffing rate to exceed 28 tires per hour. The following specifications for visible emission testing shall be followed:

[Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C. and Permit No. 0570405-005-AO]

- A) Tires to be buffed should be stockpiled prior to testing to ensure that a sufficient quantity is available to consistently process tires during the minimum 30-minute testing period.
- B) At least 13, but not more than 14, tires should be processed during a 30-minute test to meet at least 90% of capacity; otherwise, it will be load-limited as noted above.
- C) At least 2 vents with exterior filter attachments are required to be open on the collection trailer during normal operation. Additional vents, with filter attachments, may be open to reduce pressure in the trailer. Visible emission observations should be read and recorded from each of the vents open during the testing period.
- D) The test report should account for all actual operating conditions during the test, including, at a minimum,: 1) process rate of buffed tires; 2) details on number of vents open; 3) confirmation that external filters were present on all open vents; and 4) simple schematic identifying the location of each vent as it was observed during the testing period. Failure to submit the input rates and actual operating conditions may invalidate the test.

11. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted. [Rule 62-297.310(7)(a)9., F.A.C.]

12. In order to demonstrate compliance with Specific Condition Nos. 4 and 7, the permittee shall maintain daily records of operations for the most recent two year period. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state or federal air pollution agency upon request. The records shall include, but not limited to, the following:

[Rule 62-4.070(3), F.A.C.]

- A) Day, Month and Year
- B) Hours of operation of buffing machines
- C) Total number of tires processed
- D) Daily average (lb/hr) of tires processed
- E) Monthly and rolling 12-month totals of items specified in B) and C)
- F) Records as required by Specific Condition No. 15.K)

13. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are

SPECIFIC CONDITIONS:

applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include, but not limited to, the following:  
[Rule 62-296.320(4)(c), F.A.C.]

- A) Periodic observation of the particulate collection trailer to ensure proper operation. Inspections of the trailers should include filters, particulate level, inlet hose connection and seals around the doors.
- B) Frequent inspection and sweeping of area around trailer, specifically after doors are opened for internal inspection and when trailers are swapped.
- C) Blowers shall not be used in lieu of sweeping.
- D) Practice good housekeeping within the building, specifically around the tire coating area. Inspect and replace filter as necessary.
- E) Keep door in the buffer room closed as often as possible during buffing operation.

14. The permittee shall not store, handle, process, or use in any process the volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems as follows and as deemed necessary and ordered by the Environmental Protection Commission of Hillsborough County: [Rule 62-296.320(1)(a), F.A.C.]

- A) Maintain tightly fitting cover, lids, etc. on all containers when they are not being handled, tapped, etc.
- B) Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, etc. of VOC so that it can be covered when not in use.
- C) Immediately attend to all spills/waste as appropriate.

15. The following conditions regarding the operation and maintenance of the particulate collection system for the buffing operation shall be followed: [Rule 62-4.070(3), F.A.C.]

- A) Ensure that the blower and collection system are properly operating prior to starting the buffing operation.
- B) At least two trailer vents shall remain open at all times during the buffing operations. Attached to the exterior of the vents shall be filters for secondary control of emissions. More vents may be opened, with associated filters in place, as needed. The vents located the furthest distance from the inlet should be the first to be opened.
- C) Filters shall be inspected and cleaned during each swap-out of trailers and at least once a week during operation of the buffers. Additional inspection and maintenance shall be conducted as necessary to ensure the collection system is operating as designed.
- D) Maintain extra filters for replacement needs or use on additional vents that may be opened.
- E) Use collar/flange to seal gap around inlet hose where it enters the trailer.
- F) Periodically inspect the seals on the rear doors of the trailer and the seals around the flange of the inlet hose to minimize release of air. Corrective action should be taken immediately to minimize or eliminate any open joints.

SPECIFIC CONDITIONS:

- G) If emissions are observed from gaps in the duct, trailer door seals, or from the filters covering the vents, stop the operation and provide maintenance to alleviate the problem. Besides repairs of open gaps as stated in F) above, consider opening additional vents with filters in place to reduce trailer pressure.
- H) Report defective trailers to trucking company for repair (i.e. bad doors/seams, problems with vents, improper opening for inlet hose, etc.)
- I) Without the blower running, frequently inspect the height of collected rubber inside the trailer and level the pile as much as possible. Due to weight restrictions and collection efficiency, no more than ½ of the trailer height should be filled with collected material. At least 5 days in advance of reaching the designated height limit, the permittee shall contact the trucking company to schedule replacement of trailer.
- J) Sweep under and around the trailer as needed and each time the doors are opened or trailers are swapped-out.
- K) Maintain records of weekly filter inspections and cleaning, including dates of filter replacements. Also record any non-routine maintenance or corrective action taken to address problems with the system.

16. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rule 62-297.310(7)(b), F.A.C.]

17. The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.

18. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200(203), F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

- A) Alteration or replacement of any equipment or major component of such equipment.
- B) Installation or addition of any equipment which is a source of air pollution.

19. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

Wingfoot Commercial Tire

PERMIT/CERTIFICATION NO.: 0570405-006-AO  
PROJECT: Tire Retreading Facility

SPECIFIC CONDITIONS:

20. Prior to sixty days before the expiration of this operating permit, the permittee shall apply for a renewal of the permit using the current version of the permit renewal application form. A renewal application shall be timely and sufficient. If the application is submitted prior to sixty days before the expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the EPC or, if there is court review of the final agency action, until a later date is required by Section 120.60, Florida Statutes. [Rule 62-4.090, F.A.C.]

ENVIRONMENTAL PROTECTION  
COMMISSION OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.  
Executive Director