November 18, 2010

Mr. Blane Johnson
Air Pollution Source Permitting Section
Environmental Quality Division
407 North Laura Street, Third Floor
Jacksonville, FL 32202

Re: Tire Centers LLC Jacksonville Facility Permit Renewal Application

Dear Mr. Johnson,

Per your discussion with Ginger Ellis regarding the change in emissions calculation for emissions from retread tire curing, we are providing the clarification you requested. Michelin Retread Technologies improves our processes and as such, we may determine that a revision to the calculation methodology may be needed. The current calculation is representative of the retread process as it operates today.

The current calculation is based on the fact that most of the tire has been cured previously. The emissions that may fully occur from curing are from uncured ("green") rubber. The only portion of the retread that is uncured rubber is 3.3 lbs. This is a known standard weight for the portion of uncured rubber that is added in the retread tire building process. In addition to the uncured rubber emissions, we are aware that there is a possibility of some minimal additional off-gassing from the used tire that has been cured. The emissions are known to be less than 20% of that for uncured rubber.

The actual calculation is as follows:

273,750 tires/yr		273,750 tires/yr
x 3.31 lbs uncured rubber/tire	and	x 140.7 lbs cured rubber
905,428 lbs rubber available		38,504,033 lbs rubber
		x 20% available
		7,700,807 lbs rubber available

Then the total rubber available to produce emissions is:

905,428 + 7,700,807 = 8,606, 235

If you should have any questions, please call Ginger Ellis at (864) 367-0481 or e-mail her at (regulatorystrategies@gmail.com).

Yours,

Sam Gaddis
Environmental Protection Manager

MICHELIN RETREAD TECHNOLOGIES, INC.
632 Inglesby Parkway
Duncan, South Carolina, 29334
TEL: 864-433-1603 • FAX: 864-627-5615