ENVIRONMENTAL AND COMPLIANCE DEPARTMENT

Jacksonville
Where Florida Begins.

Permittee:
Tire Centers, LLC
5700 Commonwealth Avenue
Jacksonville, FL 32254-2204

Permit No.: 0310489-005-AO
Facility ID No.: 0310489
SIC No.: 7534
Project: Tire Retreading Plant

This permit is for the operation of a tire retreading plant. This facility is located at 5700 Commonwealth Avenue, Jacksonville, Duval County, FL 32254-2204; UTM Coordinates: Zone 17, 428.4 km East and 3360.0 km North; Latitude: 30° 20' 09" North and Longitude: 81° 44' 49" West.

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 Florida Administrative Code (F.A.C.). 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 Environmental and Compliance Department, Environmental Quality Division (Department) in accordance with the terms and conditions of this permit.

Renewal Application Due Date: **August 31, 2015**
Expiration Date: **October 31, 2015**

Environmental and Compliance Department
Environmental Quality Division

Robert Steven Pace, P.E., Manager
Air Quality Branch

RSP/CBJ

S:\PERMITS\Operation Permit (OP)\0310489-005-AO.doc

Section I. Facility Information

Subsection A. Facility/Project Description

This permit is for the operation of a tire retreading plant and associated equipment. The operation consists of two (2) tire grinding machines, the dissolution application and repair stations, the tire curing process (3 autoclaves), the wheel refurbishing process (shot blast and powder coating application), and a 100 horsepower (3.35 MMBTU/hr) natural gas fired boiler.

The facility is a natural non-Title V source of air pollution because the potential emissions of regulated air pollutants are less than 100 tons per year and the potential emissions of Hazardous Air Pollutants (HAP) are less than 10 tons per year for a single HAP and less than 25 tons per year for total HAPs pursuant to Chapter 62-210, F.A.C., and Rule 2.301, Jacksonville Environmental Protection Board (JEPB).

Subsection B. Summary of Emission Unit (EU) ID Numbers and Brief Descriptions

EU No.	EU Description
001	Two Tire Grinding Machines
002	Dissolution Application and Repair Stations
003	Tire Curing Process

Subsection C. Relevant documents

Permit No.: 0310489-004-AO
Air operating permit application received September 28, 2010

Section II. Facility Wide Conditions

Subsection A. General Conditions

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
   a. Have access to and copy any records that must be kept under conditions of the permit;
   b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
   c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

   Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
   a. A description of and cause of noncompliance; and
   b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:
   ( ) Determination of Best Available Control Technology (BACT)
   ( ) Determination of Prevention of Significant Deterioration (PSD)
   ( ) Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:
    a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
    b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
    c. Records of monitoring information shall include:
        1. The date, exact place, and time of sampling or measurements;
        2. The person responsible for performing the sampling or measurements;
        3. The dates analyses were performed;
        4. The person responsible for performing the analyses;
        5. The analytical techniques or methods used;
        6. The results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.
    [Rule 62-4.160, F.A.C., and Rule 2.1401, JEPB]

Subsection B. Specific Conditions

1. Any revision to a permit or application shall be submitted to and approved by the Department prior to implementation.
   [Rule 62-4.080(2), F.A.C., and Rule 2.1401, JEPB]

2. Prior to sixty (60) days before the expiration of this permit, the permittee shall apply for renewal of the permit using form 62-210.900(4). If the application is submitted prior to the days specified above before 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 acted upon by the Department.
   [Rule 62-4.090, F.A.C., and Rule 2.1401, JEPB]

3. 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(2), F.A.C., and Rule 2.1101, JEPB]

4. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.

   Reasonable precautions include but are not limited to the following:
   a. Paving and maintenance of roads, parking areas and yards.
   b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.

c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
e. Landscaping or planting of vegetation.
f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
g. Confining abrasive blasting where possible.
h. Enclosure or covering of conveyor systems.
[Rule 62-296.320(4)(c), F.A.C., and Rule 2.1101, JEPB]

5. Emission testing shall be conducted with the EU operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then EU may be tested at less than capacity; in this case subsequent EU operation is limited to 110 percent of the test load until a new test is conducted. Once the EU is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.
[Rule 62-297.310(2), F.A.C., and Rule 2.1201, JEPB]

6. Stack sampling facilities shall be provided upon Department request with a method of access that is safe and readily accessible in accordance with OSHA standards (29CFR1910, Subparts D and E). Permanent stack sampling ports and platforms are not required.
[Rule 62-297.310(6), F.A.C., and Rule 2.1201, JEPB]

7. The permittee shall notify the Department at least fifteen (15) days prior to EU annual compliance testing.
[Rule 62-297.310(7)(a)9, F.A.C, and Rule 2.1201, JEPB]

8. The permittee shall file a report with the Department on the results of each compliance test as soon as practical but no later than forty-five (45) days after completion of testing.
[Rule 62-297.310(8), F.A.C., and Rule 2.1201, JEPB]

9. This facility is subject to the Ordinance Code of the City of Jacksonville, Title X, Chapter 360 [Environmental Regulation], Chapter 362 [Air and Water Pollution], Chapter 365 [Hazardous Regulated Substance Program], Chapter 376 [Odor Control], JEPB Rule 1 [Final Rules with Respect to Organization, Procedure, and Practice], and JEPB Rule 2, Part Nos. I through III and Part Nos. IX through XIV [Air Pollution Control].

10. The permittee shall submit all compliance related notifications and reports required by this permit to:

Environmental and Compliance Department
Environmental Quality Division
407 North Laura Street, Third Floor
Jacksonville, FL 32202
Telephone: (904) 255-7100
Fax: (904) 588-0518

Section III. Emission Units and Conditions

Emission Unit No. 001 - Tire Grinding

Emission Unit Description: This emission unit consists of two (2) grinding machines, which remove tire tread to prepare the surface of used tires for the retreading process. Rubber PM ground off the tires is collected by vacuum systems attached to the two grinding machines and is transported via a duct to two cyclone separators. Collected rubber material is sent to a truck for storage and disposal. Process air is discharged to the atmosphere.

Essential Potential to Emit (PTE) Parameters

1. The maximum combined process rate for the tire grinding machines is 31.25 tires per hour (750 tires per day; 273,750 tires per year).
[Rule 62-210.200(PTE), F.A.C., and Rule 2.301, JEPB]

2. This EU is permitted to operate continuously, i.e., 8760 hours per year.
[Rule 62-210.200(PTE), F.A.C., and Rule 2.301, JEPB]

Emission Limitations and Standards

3. The total maximum allowable emission of Particulate Matter (PM) is limited to less than 15 tons per year and less than 5 pounds per hour.
[Rule 62-296.700(2)(a), F.A.C., and Rule 2.1101, JEPB]

4. The Visible Emissions (VE) from the exhaust of each grinding machine cyclone separator shall be limited to less than 20% opacity.
[Rule 62-296.320(4)(b)1, F.A.C., and Rule 2.1101, JEPB]

Test Methods and Procedures

5. Testing for demonstration of compliance for PM emissions shall be performed upon request by the Department on each grinding machine cyclone separator in accordance with EPA Reference Method 17 with an acetone wash and the average stack temperature less than 275 degrees Fahrenheit. EPA Method 5 with an acetone wash may be used as an alternate method.
[Rule 62-296.320(4)(a)3.b.(ii), F.A.C., and Rule 2.1101, JEPB]

6. Testing for demonstration of compliance for VE shall be performed on each grinding machine cyclone separator in accordance with EPA Reference Method 9 for the visual determination of opacity.
[Rule 62-296.320(4)(b)4.a, F.A.C., and Rule 2.1101, JEPB]

7. Testing for demonstration of compliance of VE shall be performed on each grinding machine cyclone separator annually, from the date of December 1, 2010.
[Rule 62-297.310(7)(a)4, F.A.C., and Rule 2.1201, JEPB]

8. The permittee shall keep records of the daily process rate. The records shall be maintained for a minimum of five (5) years and made available to the Department upon request.
[Rule 62-210.370(2)(h), F.A.C., and Rule 2.301, JEPB]

Emission Unit No. 002 - Dissolution Application and Repair Stations

Emission Unit Description: This emission unit is comprised of application and repair stations. Repair rubber is packed into the repair areas. A heptane-based adhesive (dissolution) is applied by hand to the repair areas to bond the repair rubber to the tire carcass. Patching involves the application of a patch to the carcass interior. After all repairs are completed, dissolution is applied by hand to the carcass to refresh it prior to applying new tread. VOC emissions are exhausted through a stack.

Essential Potential to Emit (PTE) Parameters

1. The maximum application rate of dissolution is limited to 25 grams per tire (1.7 pounds per hour, 41.3 pounds per day; 7.5 tons per year).
   [Rule 62-210.200(PTE), F.A.C., and Rule 2.301, JEPB]

2. This EU is permitted to operate continuously, i.e., 8760 hours per year.
   [Rule 62-210.200(PTE), F.A.C., and Rule 2.301, JEPB]

Emission Limitations and Standards

3. The permittee shall allow no person to store, pump, handle, process, load, unload, or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
   [Rule 62-296.320(1), F.A.C., and Rule 2.1101, JEPB]

Recordkeeping and Reporting

4. The permittee shall keep records of the daily application rate of dissolution and the VOC content of the dissolution. The records shall be maintained for a minimum of five (5) years and made available to the Department upon request.
   [Rule 62-210.370(2)(h), F.A.C., and Rule 2.301, JEPB]

Emission Unit No. 003 - Tire Curing Process

Emission Unit Description: This emission unit consists of three (3) autoclaves for the curing of tires after repair and the application of dissolution and new tread. Emissions are vented through two roof exhaust vents.

Essential Potential to Emit (PTE) Parameters

1. The maximum combined process rate for the autoclaves is 31.25 tires per hour (750 tires per day; 273,750 tires per year).
   [Rule 62-210.200(PTE), F.A.C., and Rule 2.301, JEPB]

2. This EU is permitted to operate continuously, i.e., 8760 hours per year.
   [Rule 62-210.200(PTE), F.A.C., and Rule 2.301, JEPB]

Emission Limitations and Standards

3. The permittee shall allow no person to store, pump, handle, process, load, unload, or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C., and Rule 2.1101, JEPB]

Recordkeeping and Reporting

4. The permittee shall keep records of the daily process rate. The records shall be maintained for a minimum of five (5) years and made available to the Department upon request. [Rule 62-210.370(2)(h), F.A.C., and Rule 2.301, JEPB]

Exempt Emission Activities

The following activities are exempt from permitting.

100 horsepower natural gas fired boiler
Enclosed shot blast unit
Wheel rim powder coating operation

[Rule 62-210.300(3)(a) and (b), F.A.C., and Rule 2.301, JEPB]