Company Name:	Michelin North America Inc Sandy Springs Facility (US2)	**Permit Writer:**	Michael Robertson
Agency Air Number:	0200-0018	**Date:**	August 6, 2025
Permit Number:	TV-0200-0018 v2.0		

DATE APPLICATION RECEIVED: April 01, 2020
DATE OF LAST INSPECTION: February 08, 2023 - No Violation Observed

PROJECT DESCRIPTION

This facility is requesting to renew their TV operating permit.

FACILITY DESCRIPTION

The facility converts raw and synthetic rubber into finished rubber for use at other Michelin facilities. The natural and synthetic rubbers are chipped and blended, mixed with fillers, mixed with process oils, and mixed with rubber compounding chemicals. This mixture is then milled, sent through calendars, cooled, and palletized for shipment.

The facility's primary business activity is based on:
SIC CODES: 3011 - Tires and Inner Tubes, 3471 - Electroplating, Plating, Polishing, Anodizing, and Coloring
NAICS CODES: 326211 - Tire Manufacturing (except Retreading), 332813 - Electroplating, Plating, Polishing, Anodizing, and Coloring.

SINGLE SOURCE DETERMINATION

The facility is not collocated with any other facility.

CHANGES SINCE LAST OP ISSUANCE

The following changes have been made to the facility since their last Title V renewal was issued:

- Emission unit Id 24 updated to remove the word Codification as this area has not been referenced as "codification" for years.
- Zinc Electroplating (id ZNELEC) moved from insignificant list to its respective process emission unit (EU20) cable drawing machines, as it is directly involved in the production process to make finished wire. The facility provided a minor modification (February 6, 2024) to include additional description to Zinc plating and Acid Baths (insignificant source) and to note Dry Drawing process includes resistance butt welding in the workshops. There are no anticipated emissions from the welding (no flux or consumable electrode) and the oxide scale applied by the manufacturer is removed prior to heating. There are no EPA factors for this type welding. As a worst case scenario the facility assumed Metal HAP is released during the heating. The change in emissions estimates for this update are below the insignificant threshold rate in accordance with S.C. Regulation 61-62.70.5(c).
- The facility's cartridge filter condition C.6 (previously issued permit) was updated to the standard template condition requiring daily inspection. The facility requests an alternate monitoring schedule extending the length of time between inspections of the bin vent filters. According to the facility, access to the filters for inspection requires climbing separate ladders and walking metal catwalks. Climbing the ladders, particularly in inclement weather, presents a substantial safety risk to plant personnel. The BAQ agrees daily inspection is an over burdensome requirement and updated storage silo bin vent conditions to preform quarterly filter inspections.
- The No. 4 fuel oil tanks (TK01, TK02, P04, and GASTK) have been emptied and removed from service.
- EU19 (BOIL1 & BOIL2): Minor Modification dated June 21, 2023; the facility notified BAQ the boilers are being limited to burning natural gas only. No. 2, 3, 4, 5 & 6 fuels oils were removed as approved fuel from conditions (C.10 & C.11) of previously issued TV permit.

- EU01 SP6 was never installed and was removed from the permit.
- On August 9, 2018, Construction Permit Application received for Mixer 7 replacement. BAQ determined the project qualified for a like kind replacement. The aging mixer replaced with a like kind unit with the same capacity. The like kind replacement is exempt from construction permitting per SC Regulation 61-62.1, Section II.A.1.b and permitting Guidance Document, memorandum Like-for-Like replacement of equipment and control device(s) at Prevention of Significant Deterioration (PSD) Major Sources dated November 2, 2011, revised January 9, 2014, August 27, 2015.
- EU23 Metallic Tissue Line: The equipment ids and description updated to show this is a collection of equipment that is a process line not individual standalone pieces of equipment.
- In a letter received July 27, 2023, the site requested to obtain Federally enforceable HAP PTE limits of 10.0/25.0 tpy to be reclassified as an area source per 40 CFR §63.1(c)(6)(i)(A) under section 112 of the Clean Air Act.
- BAQ received a minor modification for the June 17th1993 Boiler 2 derating.

Boiler Derating:
Currently the facility is permitted for Boilers 1 and 2. The Boiler maximum capacities are listed as 55.2 Million Btu/hr and 108 Million Btu/hr respectively. Historically there was confusion on boiler 2 capacity. On May 23, 1995, boiler steam limit clarification letter (modeling purposes), the facility notes based on Boiler 2 (boiler plate) has a maximum capacity 108 Million Btu/hr or 100,000 PPH, of steam; however, the expected maximum output is 90,000 lbs/hr Steam.

Michelin provided archived information for boiler 2 derating. The historical files include the following:

1. June 17, 1993 Orifice Plate Installation work order of completion and March 26, 1992 engineering specification and analysis performed by FLO-MAX out of Kingwood Texas. According to the Orifice Plate Installation Boiler 2 Maximum steam flow is 72,000 PPH and Normal steam flow is 50,399 PPH.
2. Tune up records (Thermal Economy) indicates the boiler capacity in pounds of steam per hour (PPH) @ 100, 000, and under normal operating loads @ approximately 52,000 PPH.

Michelin is submitting this information to BAQ as historical records for BAQ archived files and to establish an understanding of the boiler steam load reduction. This information should bring more clarity to historical limits, emissions calculations, modeling and other generic references to “derating” the boiler.

Michelin reduced the steam production of Boiler 2 for operational purposes and not related to a regulation. Michelin seeks to establish Boiler 2 as a 72,000 lbs steam (approximately 86,000,000 Btu/hr) boiler. The orifice plate is permanently installed and has been in place for over 25 years. The facility proposes the boiler has been derated based on the following Orifice Plate Installation:

1. Permanent Physical Change: The facility made and continues to maintain a permanent physical change in the operational capability of the boiler. During a planned shutdown of the facility, a 14 inch concentric orifice plate made of Monel was installed and welded in place restricting the steam flow to a maximum 72,000 lbs/hr. The boiler tune-ups confirm the reduced flow. The plate has been in place for over 25 years.

2. Cannot Easily be Undone: In order to “undo” the change, at a minimum, an extended shutdown would be required and welded orifice plate would have to be cut from its location and piping restored.

3. Require a System Shutdown: The orifice plate could not be removed without a shutdown.

4. Capacity Reduction: The steam capacity for the boiler has been shown to be reduced in tune-up and on steam load monitors at the facility.

Based on boiler criteria discussed, boiler 2 meets the requirements for derating. According to the facility this is for documentation only and Michelin is aware of the update without any changes made to the current permit.

Equipment/Emission Units removed from permit. They were previously included on Emission Unit Description table.

VOID EQUIPMENT					
Emission Unit ID	**EU Description**	**Equipment ID**	**Equipment Description**	**Reason for VOID Status**	**Date Removed**
02	Group 2	GP02	Rubber Group 2	Moved to EU01	2008
03	Group 3	GP03	Rubber Group 3	Moved to EU01	2008
04	Group 4	GP04	Rubber Group 4	Moved to EU01	2008
05	Group 5	GP05	Rubber Group 5	Moved to EU01	2008
06	Group 6	GP06	Rubber Group 6	Moved to EU01	2008
07	Group 7	GP07	Rubber Group 7	Moved to EU01	2008
08	Group 8	GP08	Rubber Group 8	Moved to EU01	2008
09	Group 10	GP10	Rubber Group 10	Moved to EU01	2008
10	Group 11	GP11	Rubber Group 11	Moved to EU01	2008
11	Group 12	GP12	Rubber Group 12	Moved to EU01	2008
12	Filler Transport	CB01	Carbon Black transport Line 1	Moved to EU01	2008
13	Filler Transport	CB02	Carbon Black transport Line 2	Moved to EU01	2008
14	Filler Transport	CB03	Carbon Black transport Line 3	Moved to EU01	2008
17	Filler Transport	SIL	Silica Transport Line 4	Moved to EU01	2008
21	Process Oil	P01	20,000 gal Storage Tank	Moved to Insignificant Activity List	2008
21	Process Oil	P02	20,000 gal Storage Tank		2008
21	VOL	P03	20,000 gal Storage Tank		2008
21	Used Drawing Lubricant	P04	22,500 gal Storage Tank		2008
22	Electroplating	EL01	Sulfuric Acid Plating	Combined w/its respective process EU20	2015

EMISSIONS

FACILITY WIDE EMISSIONS			
Pollutant	**Uncontrolled**	**Controlled**	**PTE**
	TPY	**TPY**	**TPY**
Particulate Matter (PM)	686.8	94.8	686.8
Particulate Matter (PM_{10})	431.5	58.3	431.5
Particulate Matter ($PM_{2.5}$)	209.9	27.3	209.9

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FACILITY WIDE EMISSIONS			
Pollutant	**Uncontrolled**	**Controlled**	**PTE**
	TPY	**TPY**	**TPY**
Sulfur Dioxide (SO_2)	0.42	--	0.42
Nitrogen Oxides (NOx)	154.6	72.5	154.6
Carbon Monoxide (CO)	59.44	--	59.44
Carbon dioxide (CO_2)	83067.5	--	83067.5
Carbon Dioxide Equivalent (CO_2e)	83926.2		83926.2
Volatile Organic Compounds (VOC)	222.28	--	222.28
Lead (Pb)	1.57E-03	4.06E-04	1.57E-03
Highest Single HAP (Methyl isobutyl ketone)	8.60	--	<10.0
Total HAPs	28.49	--	<25.0

Facility Wide Emissions include insignificant activities.

SOURCE TEST REQUIREMENTS

The facility will be required to quantify, silica dust, particulate matter (PM), particulate matter less than 10 microns (PM_{10}), particulate matter less than 2.5 microns ($PM_{2.5}$) from the carbon black and silica transport systems and manufacturing process emission sources.

SPECIAL CONDITIONS, MONITORING, LIMITS

Inherent determination based on the submitted original from February 2002 and updated October 2014 (2015 Title V renewal).
Michelin US2 process equipment includes the Filler Transport dust collectors, Rubber Groups (1-8, 10 & 11) dust collectors, EU18 dust collector, EU20 dust collectors and EU24 dust collector as inherent to the process.

Michelin's dust collectors are inherent to the process due to material recovery, process equipment; safety requirements associated with combustible dust conditions and cost savings. The dust collectors are used to recover raw materials, such as carbon black, from the production processes for reuse (cost savings). The baghouse dust collectors were installed and operated primarily for purposes other than compliance with air pollution regulations.

Two regulatory publications were consulted for the definition of inherent process equipment, the BAQ Guidance Document entitled "Definition of Pollution Control Device vs. Process Emission Unit in Determining Regulatory Applicability" issued May 7, 2004, and the preamble to 40 CFR Part 64, "Compliance Assurance Monitoring (CAM)", finalized on October 22, 1997.

The BAQ May 7, 2004, guidance specifies the following analysis in order to assess whether equipment would be considered inherent.

1. Is the primary purpose of the equipment to control air pollution?
No, Michelin US2 facility was originally constructed in 1975 and included installation of baghouse dust collectors. The primary purpose for installing the baghouse dust collectors are for recycling valuable raw material back into the process; eliminating the cross contamination of raw materials to other rubber mixing groups; safety requirements associated with combustible dust and reduction of equipment maintenance issues due to raw material damage.

2. Where the equipment is recovering product, how do the cost savings from the product recovery compare to the cost of the equipment?
The baghouse dust collectors are inherent process equipment. They are a design element necessary for the proper and safe functioning of the plant and for product recovery. The cost saving for the dust collectors (capture carbon black and silica and return it to the process) equaling a 3-year payback for each dust collector and Michelin would operate the equipment at their design efficiency regardless of air quality regulations.

3. Would the equipment be installed if no air quality regulations are in place?
Yes, baghouse dust collectors are, were historically, utilized by the plant to recover product and reduce equipment maintenance issues due to raw material damage.

If the answers to these questions suggest that equipment should be considered an inherent part of the process, the effect of the equipment or practices can be taken into account in calculating potential emissions regardless of whether enforceable limitations are in effect.

At this time, BAQ does not agree to inherent process equipment for the Group 6, Group 10, MACBU, Dry Draw, and the ABU, SPBU, MBU dust collectors based solely on safety conditions in determining potential to emit. Michelin has agreed with BAQ.

The preamble to 40 CFR 64, "Compliance Assurance Monitoring (CAM)", defines inherent process equipment as "equipment that is necessary for the proper or safe functioning of the process, or material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations". The following analysis was performed in order to assess whether equipment would be considered inherent.

1. Is the dust collector necessary for the proper or safe functioning of the process?
Yes, the primary purpose for installing all the baghouse dust collectors are for safety requirements associated with combustible dust and reduction of equipment maintenance issues due to raw material damage.

2. Is the dust collector operated primarily for purposes other than compliance with air pollution regulations?
Yes, baghouse dust collectors are, were historically, utilized by Michelin to remove combustible dust from the process area.

The Group 6, Group 10, MACBU, Dry Draw, and the ABU, SPBU, MBU Dust collectors were not considered to be inherent for NSR purposes, based solely on safety for combustible dust. They were considered inherent for CAM purposes.

Dust collectors below are **not** considered inherent based solely on safety for combustible dust (NSR).

Emission Unit ID	Equip ID	Control Device ID	Emission point
EU01	GP6 MIX	ZB06DP	430 ZD01
EU01	GP10 MIX	ZB10 ODP10	430 ZD12
EU18	MACBU	ZAM6DC	MB01
EU20	DRY DRAW	DD 331 DC505	331 RD05

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		DD 331 DC506	331 RD06
EU24	ABU, SPBU, MBU	430 DC25A	ZD44

The following dust collectors were considered to be inherent for NSR and CAM.

Inherent - EU01 Rubber Groups and Filler Transport Lines			
Process	**Equip ID**	**Emission point**	**Process Description**
Transport Line 1	F1	411 CD01	Carbon black (CB) from lines 1 & 2 is recovered from belt conveyors and elevators and returned to system. Line 3 transfers CB pneumatically to storage bins SP103 – SP106 which have bin-vent cartridge filters. The baghouses and storage bin filters are inherent to the process. The uncontrolled emissions were determined based on a conservative 2% dusting and 99% material recovery.
	F2	411 CD02	
	F3	430 ZD10	
Transport Line 2	F4	411 CD03	
	F5	411 CD04	
	F6	430 ZD11	
Transport Line 3	F7	411 CD05	
	F8	411 CD05	
Transport Line 4	Receiver 1	411 CD06	Line 4 transports silica pneumatically to Receiver 1, Storage Silos S7 and S8, Intermediate Receiver 2 and then on to two Day bins. The filters associated with this line bleed off air pressure generated during the product transfer. Without these bleed-off filters, the pneumatic transfer system would lose significant amounts of product making the system economically infeasible to operate. The filters are inherent process equipment. The uncontrolled emissions were determined after the filters 99.5%)
	Storage Silos	411 CD07	
	Receiver 2	411 CD09	
	Day Bin SP1	430 CD29	
	Day Bin SP7	430 CD30	
(Groups 1-5, 7, 8 & 11) Mixers & Mills	GP1 MIX MILL	430 ZD03	Silica, carbon black, and small amounts of other chemicals are weighed prior to being added to the mixing process. The filters are inherent in process equipment. The uncontrolled emissions was determined based on a scaled-up stack test at mixer and mill dust collector on US8 Group 1. Group 11 also transfers CB pneumatically to storage bins equipped with cartridge filters. Mixing Groups 1 and 3 and Mixing Groups 2 and 8 share the same dust collector.
	GP1MIX/GP3 MIX	430 ZD06	
	GP2MIX/GP8 MIX	430 ZD07	
	GP2 MIX/MILL	430 ZD04	
	GP3 MIX	430 ZD05	
	GP4 MIX	430 ZD08	
	GP5 MIX	430 ZD09	
	GP7 MIX	430 ZD22	
	GP11 BIN	441 ZD32-36	
	GP11 BIN	441 ZD39-41	
	GP11 MIX	442 ZD25	
Group 11 Filler & Zinc Oxide Weighing	GP11 CB	441 ZD24	Zinc Oxide is weighed prior to being added to the mixer. The filters are inherent process equipment. The uncontrolled emissions determined based on a
	GP11 ZO	441 ZD31	

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Inherent - EU01 Rubber Groups and Filler Transport Lines			
Process	**Equip ID**	**Emission point**	**Process Description**
			scaled-up stack test at filler weighing outlet on US8 Group 1.
Group 12	GP12	440 ZA01	The chipping process uses an anti-stick dust collector to assure that excess loose talc does not enter the mixing portion of the process. Excess talc will result in a rubber mix that cannot meet quality standards. The Anti-Stick dust collector is inherent to the process. The dust collector is interlocked with both the chipper and mixer to assure that neither can operate if the dust collector is not operating. The uncontrolled emissions were determined after the filters (99.6%).

REGULATIONS

Synthetic Minor Limits					
Permit ID	**Equipment ID**	**Permit Issue Date**	**Pollutant**	**Emission Limit (TPY)**	**Explanation**
0200-0018-CF	Group 10	March 27, 1989	PM PM_{10}	less than 25.0 tpy less than 15.0 tpy	PSD avoidance
0200-0018-CR	MACBU	February 23, 2001	PM PM_{10} $PM_{2.5}$	less than 2.0 tpy less than 2.0 tpy less than 2.0 tpy	PSD avoidance
TV-0200-0018 v2.0	Facility Wide	Issuance of this permit	Single HAP Combined HAP	less than 10.0 tpy less than 25.0 tpy	MACT avoidance

Applicable - Standard No. 1 *(Emissions from Fuel Burning Operations)*

ID	PM Allowable (lb/hr)	SO_2 Allowable (lb/hr)	Uncontrolled Emissions		Controlled Emissions	
			PM (lb/hr)	SO_2 (lb/hr)	PM (lb/hr)	SO_2 (lb/hr)
BOIL1	33.12	126.96	0.41	0.03	--	--
BOIL2	64.8	248.4	0.80	0.60	--	--

Applicable - Standard No. 3 (state only) *(Waste Combustion and Reduction)*
The Boilers in EU19 are subject to pollutant limits in accordance with Section III (J) Industrial Boilers and Utility Boilers.

Due to the nature of the material being combusted (odor control for rubber Groups 8 and 12), all source tests (Section VIII (A)), Waste Analysis (Section V (G)) and operator training requirements (Section IX) of this Standard have been waived for this facility.

Applicable - Standard No. 4 *(Emissions from Process Industries)*

Process	Max Process Weight Rate (tons/hr)	PM Allowable at Max (lb/hr)	Uncontrolled Emissions PM (lb/hr)	Controlled Emissions PM (lb/hr)	Monitoring
EU01	Process weight rates are confidential		106.1	17.1	Pressure drop and maintenance check
EU18	Process weight rates are confidential		6.44	0.13	Pressure drop and maintenance check
EU20	Process weight rates are confidential		30.8	2.62	Pressure drop and maintenance check
EU23	Process weight rates are confidential		0.00	0.00	No monitoring is required based on no particulate matter emitted and that the emissions are VOC based
EU24	Process weight rates are confidential		11.8	0.24	Pressure drop and maintenance check

Michelin requests that all Standard No. 4 processes be consolidated under 20% opacity for ease of monitoring and recordkeeping. The following sources EU01 (FIL1; FIL2), EU15 (Block Weighing and Gluing), EU16 (Textile Tissue), EU20 (DRW), EU24 (ABU 1 & 2, SPBU, and MPBU) had a 40% Opacity limit under standard 4 and are listed here in case the facility wants to go back to the 40% Opacity in the future. Michelin will monitor pressure drop readings on the dust collector baghouses and operational and maintenance checks on bin vent cartridge filters to ensure compliance with the Opacity and PM limits.

Not Applicable - Standard No. 5 *(Volatile Organic Compounds)*
Sources in Anderson County are exempt from this regulation.

Not Applicable - Standard No. 5.2 *(Control of Oxides of Nitrogen (NOx))*
Boilers in EU19 are not subject to this regulation because the boilers are existing sources in accordance with Section I(a)(2) of this regulation and their burner assemblies have not been replaced.

Applicable - Standard No. 7 *(Prevention of Significant Deterioration)*
The facility is a major source for PSD as defined by South Carolina Regulation 61-62.5, Standard No. 7. The facility underwent PSD permitting for VOC and BACT has been applied (CP-CS).

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PSD Limit					
Permit ID	**Equipment ID**	**Permit Issue Date**	**Pollutant**	**Emission Limit (TPY)**	**Explanation**
0200-0018-CS	Mixing operations on Groups # 1-5, 7, and 11	December 3, 2002	VOC from silane	Less than or equal to 101 TPY total	PSD Limit

Applicable - 61-62.6 *(Control of Fugitive Particulate Matter)*
The facility is subject to the state-wide fugitive emissions requirements.

40 CFR 60 and 61-62.60 *(New Source Performance Standards (NSPS))*

Applicable - 40 CFR 60 Subpart IIII (*Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*) The facility operates three (3) 273 Hp Diesel fired engines used for the fire system pump subject to this regulation that are operated for emergency purposes.

Not Applicable - 40 CFR 60 Subpart BBB (*Standards of Performance for Rubber Tire Manufacturing*) Does not apply to rubber mixing.

Not Applicable - 40CFR 60 Subpart Db *(Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units)* EU19 Boiler (BOIL2) is not subject to NSPS Db because the boiler was constructed prior to June 19, 1984, and no modifications or reconstructions have occurred since then.

Not Applicable - 40CFR 60 Subpart Dc *(Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units)* EU19 Boiler (BOIL1) is not subject to NSPS Dc because the boiler was constructed prior. to June 19, 1989, and no modifications or reconstructions have occurred since then.

Not Applicable - 40 CFR 61 and 61-62.61 *(National Emission Standards for Hazardous Air Pollutants (NESHAP))*
This facility does not emit the pollutants in a way that is subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclide, radon, or vinyl chloride).

40 CFR 63 and 61-62.63 *(National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories)*
On August 30, 2024, the U.S. Environmental Protection Agency (EPA) finalized amendments to the MAJOR MACT to AREA rule for major sources. It went into effect September 10, 2024. The update removed certain MAJOR MACTs eligibility from the rule per 40 CFR Part 63.1(c)(6)(iii). Michelin will remain subject to the MAJOR Boiler MACT Subpart DDDDD and Subpart ZZZZ.

Applicable - 40 CFR 63 Subpart DDDDD (*National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, And Institutional Boilers and Process Heaters*) The facility is subject to rule per 40 CFR Part 63 (c) (6)(iii). The facility operates two different Gas-1 boilers that are fired on natural gas fuel. The boilers are subject to work practices requirements and tune-ups every five-years per 40 CFR §63.7540(a).

Not Applicable - 40 CFR 63 Subpart XXXX (*National Emission Standards for Hazardous Air Pollutants for Major Sources: Rubber Tire Manufacturing)* The facility is requesting facility wide limits to less than 10.0 tpy single HAP

and less than 25.0 tpy cumulative HAPs to be an area source under section 112 of the Clean Air Act (MM2A). Per Subpart A, the facility will need to maintain records for five years (§63.10(b)(3)).

Not Applicable - 40 CFR 63 Subpart JJJJJJ (*National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*) The boilers are classified as gas fired units as defined under 40 CFR 63.11237 and not subject to 40 CFR Part 63 Subparts A and JJJJJJ according to 40 CFR 63.11195(e). The boilers are fired on natural gas fuel.

Applicable - 40 CFR 63 Subpart ZZZZ (*National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*) The facility's original construction (1975) included three 273 Hp Emergency Fire Water pumps that were replaced with three new EPA certified engines in 2016. According to §63.6590(c)(6) a stationary RICE must meet the requirements of Part 63 by meeting the requirements of NSPS Subpart IIII (compression engines).

Not Applicable - 61-62.68 *(Chemical Accident Prevention Provisions)*
This facility does not store or use chemicals subject to 112 (r) above the threshold quantities.

Not Applicable - 40 CFR 64 *(Compliance Assurance Monitoring)*
This regulation only applies to emission units at Title V major sources with pre-controlled emissions greater than the Title V major source threshold level that utilize a control device to comply with a federally enforceable requirement.

Michelin's dust collectors are considered inherent. The dust collectors are utilized for raw material recovery and to minimize safety hazards and therefore not subject to CAM.

AMBIENT AIR STANDARDS REVIEW

Applicable - Standard No. 2 *(Ambient Air Quality Standards)*
This facility has demonstrated compliance through modeling; see modeling summary dated August 6, 2025.

Applicable - Standard No. 8 (state only) *(Toxic Air Pollutants)*
This facility has demonstrated compliance through modeling for all TAPs; see modeling summary dated August 6, 2025.

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PERIODIC MONITORING

ID	Regulatory Requirement	Measured Parameter	Required Monitoring Frequency	Reporting Frequency	Monitoring Basis/ Justification
EU19	Per S.C. Regulation 70.6(a)(3)(i)(B), compliance with the applicable requirement is demonstrated through the use of only natural gas	None	None	None	Per S.C. Regulation 70.6(a)(3)(i)(B), compliance with the applicable requirement is demonstrated through the use of only natural gas
EU01/F1, F2, F3, F4, F5, F6, F7, F8, X-3, X-6, X-4, X-7, X-5a/X-5b, X-8, X-50, ZD06DP (X-1), X-70, ODP10 (DG1), DC1, DC2, DC5, ZA01 EU18/ZAM6DC EU20/DD 331 DC505, DD 331 DC506 EU24/430 DC25A	S.C. Regulation 61-62.5, Standard No. 4, Section VIII	Pressure Drop Readings	Daily	kept on-site	Compliance with particulate matter emissions limits
EU01/FIL3 Storage Silos Filters: SP103, SP104, SP105, SP106, EGP11 BIN Filters: SP1, SP2, SP3, SP4, SP5, SP7, SP8, SP9, SP10, SP11, FIL4 (Intermediate Receiver 1 Filter; Storage Silo 7/8 Filter; Intermediate Receiver 2 Filter; Day Bin SP1 Filter; Day Bin SP7 Filter	SC Reg 61-62.1, Section II(J)	Filter presence	Quarterly filter inspections	Data Mgmt system (BMA) and kept on-site	Compliance with particulate matter emissions limits

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PERIODIC MONITORING					
ID	**Regulatory Requirement**	**Measured Parameter**	**Required Monitoring Frequency**	**Reporting Frequency**	**Monitoring Basis/ Justification**
18 MACBU	S.C. Reg 61-62.1, Sec II(E)	BU materials throughput	Each month	Semiannual basis	Compliance with particulate matter PSD avoidance emissions limits
EU01 Group 10	S.C. Reg 61-62.1, Sec II(E)	Carbon black usage	Each month	Semiannual basis	Compliance with particulate matter PSD avoidance emissions limits
EU01(Mixing Groups)	S.C. Reg 61-62.1, Sec II(E)	Silane usage	Each month	Semiannual basis	Compliance with VOC PSD emission limit
Facility Wide	S.C. Reg 61-62.1, Sec II(E)	Facility Wide HAP usage	12-Month rolling, Sum	Semiannual basis	Compliance with MACT avoidance emissions limits

Reporting algorithms required by PM, PM_{10} & $PM_{2.5}$ & HAP reporting condition B.20, B.21, B.22, & B.23

Emission Unit ID: 18 MACBU

Emission rate (PM) determined by average lbs processed and 2007 test.

$$E_{PM} = \left(\frac{\text{tons emission}}{\text{BU material}}\right) \times \text{tons BU}$$

Emission Unit ID: 01 Group 10
Emission rate determined by mass balance and AP42 PM mixing emission factor.

Tons emitted = (Filler consumption (tons) x dust collector control efficiency) + (tons rubber throughput x AP-42 mixing PM factor (tons emitted/ton processed) x dust collector control efficiency).

Emission Unit ID: 01 Mixing Groups #1-5, 7, and 11

Emission rate (VOC) determined by mass balance and silane emission factor.

$$\text{(ton VOC emissions)} = \text{(s. tons rubber)} \times \left(\frac{\text{silane used}}{\text{s. tons rubber processed}}\right) \times \left(\frac{\text{s. ton VOC}}{\text{s. ton rubber}}\right)$$

Facility Wide HAPs

EU01 Rubber Mixing, EU16 Textile Tissue, EU23 Metallic Tissue, EU24 ABU SPBU MPBU, Insignificant Activity-Feed Band.

Emission rate (HAPs) determined by:

Company Name:	Michelin North America Inc Sandy Springs Facility (US2)	**Permit Writer:**	Michael Robertson
Agency Air Number:	0200-0018	**Date:**	August 6, 2025
Permit Number:	TV-0200-0018 v2.0		

Rubber throughput and AP-42 associated compound HAP Emission Factors.

EU01 Rubber Mixing:

$$\text{SUM}\left[\left(\text{Rubber}\ \frac{\text{s. ton}}{\text{year}}\right)\text{x}\left(\text{Compound 1}\ \frac{\text{s. ton}}{\text{ton rubber}}\right)+\left(\text{Rubber}\ \frac{\text{s. ton}}{\text{year}}\right)\text{x}\left(\text{Compound 2}\ \frac{\text{s. ton}}{\text{ton rubber}}\right)\ldots\right]$$

Where SUM = the emission rate in tons per year.

EU01 Ink Marking:

$$\left(\frac{\text{ton HAP}}{\text{year}}\right)=\left(\frac{\text{liters}}{\text{ton rubber}}\right)\times\left(\frac{\text{tons rubber}}{\text{year}}\right)\times\left(\frac{\text{tons}}{\text{liter}}\right)\times\ (\%\ \text{HAP})$$

EU18 MABCU process and VAC, EU24 ABU SPBU MPBU:

$$\left(\frac{\text{ton HAP}}{\text{year}}\right)=\left(\frac{\text{tons rubber}}{\text{year}}\right)\times\left(\frac{\text{tons PM}}{\text{ton rubber}}\right)(\%\ \text{HAP})$$

EU19 Boiler natural gas combusted x natural gas AP-42 HAP emissions factors.

Emergency Fire Pumps & Generator (EPA Emission Estimating Tools): operation hp/hrs. x HAP emissions factors.

Diesel Tank (Tanks 4.0.9d): tank HAPS breathing losses + tank HAPS working losses.

EU20 Electroplating Welding:
Steel throughput x AP-42 Section 12.13 Steel Foundries PM emissions factor x HAP content.

PUBLIC NOTICE

This Title V Permit has undergone a 30-day public notice period and a sequential 45-day EPA comment period in accordance with SC Regulation 61-62.1, Section II(N) and SC Regulation 61-62.70.7(h). The comment period was open from March 6, 2025 to April 4, 2025 and the draft permit was placed on the BAQ website during that time period. Comments were received during the comment period.

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.