

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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SUBJECT: Comments on Proposed New Source Performance Standards: Tire Manufacturing Industry

FROM: F.W. Giaccone, Chief  
Air Facilities BranchRECEIVED  
ENVIRONMENTAL PROTECTION  
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TO: Robert L. Ajax, Chief  
Standards and Development BranchCENTRAL DOCKET  
SECTION

The proposed regulations allow up to 1.2 gram/tire of VOC for inside green tire spray operations and 9.3 grams/tire for outside green tire spray operations. The Guideline Document for Control of Existing Plants, which was published more than four years ago, indicated that water based mixtures were available which completely eliminate VOC emissions. Several manufacturers of these coatings were referenced. It was slightly more expensive to use water based spray and use of the water based material can result in handling delays.

The Background Information for the Proposed Standards indicates that most available inside and outside sprays contain no VOCs. The sprays range from no VOC to 1.2 and 9.3 grams/tire. Rather than permitting proposed new sources to emit the maximum amount of VOC available for water based sprays, the regulation should reflect the more stringent limitation since most sources should be able to utilize sprays containing no VOCs. Provisions could be made so that the few sources that need to utilize some solvents could be permitted to do so upon submission of satisfactory justification.

The elimination of solvents from the green tire spraying operations can have a significant effect on plant emissions. For a medium sized plant, with a production rate of 30,000 tires/day, the difference between the proposed standards and the elimination of solvents from green tire spraying would reduce emissions by 93 tons/year. For a large 50,000 tire/day facility, the difference would be more than 150 tons/year.

cc: Stephen Luftig