NEW YORK STATE | Department of Environmental Conservation

**KATHY HOCHUL**
Governor

**AMANDA LEFTON**
Commissioner

February 27, 2026

**VIA EMAIL ONLY**

Daniel M. Planter, Environmental Manager
The Goodyear Tire & Rubber Company
5000 Goodyear Drive
Niagara Falls, New York 14304

Dear Daniel Planter:

**Request for Additional Information**
**Goodyear Manufacturing Plant**
**DEC ID: 9-2911-00036**
**Air State Facility Permit Renewal**

New York State Department of Environmental Conservation (NYSDEC) has received and reviewed the Air State Facility (ASF) application for the Goodyear Tire & Rubber Company's Niagara Falls manufacturing facility (DEC ID: 9-2911-00036), dated September 15, 2025, submitted by David Murtha, ERM Consulting & Engineering. Based on this review, additional information is required before the permit application can be processed further. The following items must be addressed by Goodyear (the Applicant) by March 27, 2026 in an updated application package:

AERMOD Air Dispersion Modeling Protocol & Part 212 Analysis

1. With the revised permit application package, please submit a revised AERMOD air dispersion modeling protocol & Part 212 analysis (protocol). Within the revised protocol, please add a section that includes the point-by-point responses to the comments on the protocol provided by NYSDEC. This section shall include the responses provided as "*Comments on the Air Quality Modeling Protocol, dated August 1, 2025"* with the September 15, 2025 Air State Facility application and the responses to the comments provided in this letter.

2. Please add a section to the revised modeling protocol that discusses the cumulative inhalation cancer risk of aniline and o-toluidine. Aniline and o-toluidine are cancer-causing chemicals that have similar physical and chemical properties. Consequently, in the modeling report, please provide an estimation of the cumulative inhalation cancer risk of aniline and o-toluidine by doing the following:

   i. Model aniline and o-toluidine individually.

ii. Estimate the inhalation cancer risk of aniline ($Risk_A$) and o-toluidine ($Risk_{O\text{-}T}$) using the following equations:

$Risk_A$ (unitless) = $C_A$ (µg/m$^3$) ÷ $AGC_A$ (µg/m$^3$)

$Risk_{O\text{-}T}$ (unitless) = $C_{O\text{-}T}$ (µg/m$^3$) ÷ $AGC_{O\text{-}T}$ (µg/m$^3$),

where $C_A$ and $C_{O\text{-}T}$ are the annual maximum modeled concentrations of aniline and o-toluidine, respectively, and $AGC_A$ and $AGC_{O\text{-}T}$ are the annual guideline concentrations of aniline and o-toluidine, respectively.

iii. Estimate the cumulative inhalation cancer risk ($Risk_T$) of aniline and o-toluidine using the following equation:

$Risk_T = Risk_A + Risk_{O\text{-}T}$

If $Risk_T$ is less than a one-in-a-million inhalation cancer risk (i.e., $1 \times 10^{-6}$), no further action is needed. If $Risk_T$ is greater than $1 \times 10^{-6}$, Goodyear shall:

i. Demonstrate the degree of air cleaning requirements specified in 6 NYCRR Part 212 are being met for both contaminants, or

ii. Successfully demonstrate the use of Toxics Best Available Control Technology (T-BACT) for emission sources of aniline and o-toluidine.

For the above scenarios, $Risk_T$ is allowed to be a 10-in-a-million inhalation cancer risk (i.e., $1 \times 10^{-5}$).

3. **Table 4-1 and Table 4-2**: Please include the calculated numerical values for the maximum actual emissions for each contaminant.

4. **Table 4-2:** CAS# 122-39-4 has no toxicity classification assigned to it. Therefore, please change its toxicity class to “None”. Chemicals with a moderate toxicity classification or no toxicity classification are given an environmental rating of B. CAS# 68953-84-4 is not listed in DAR-1. All chemicals emitted by process operations and not listed in DAR-1 need to be reviewed by the Air Toxics Section (ATS). The results of the ATS’s review of CAS# 68953-84-4 are provided in comment 6.

5. **Table 4-2:** The EPA TANKS input data provided to NYSDEC on December 23, 2025 included cresol (o) (2-methyl-phenol) and mixed xylidines. These contaminants are not included in the AERMOD protocol. If cresol (o) (2-methyl-phenol) or mixed xylidines are being emitted by process operations, please include these contaminants in the Part 212 analysis/ AERMOD protocol and list them in Table 4-2.

6. **Table 5-1:** Nailax's CAS number is 68953-84-4, and it is not listed in DAR-1. As stated in comment 4, all chemicals emitted by process operations and not listed in DAR-1 need to be reviewed by the ATS. The results of the ATS’s review are below.

| Chemical Name | CAS # | AGC (µg/m$^3$) | SGC (µg/m$^3$) | Toxicity Classification | MEL (lbs/yr) | Env. Rating |
|---|---|---|---|---|---|---|
| Nailax | 68953-84-4 | 4.0 | 2,400 | MODERATE | 100 | B |

Appendix D-1 of the protocol shows that the facility-wide actual annual emission rate for Nailax is 44 lbs/yr, which is less than its MEL of 100 lbs/yr. Therefore, modeling is not required for this chemical. Please include the results of the ATS's review in Section 5.1 in the revised protocol.

7. **Figure 5.3:** Please add the recycling tanks description following Figure 5.3:

*Unreacted raw material from the product manufacturing process is recovered and recycled back into the manufacturing process. The recycle material composition varies based on the variability of recovered and recycled unreacted raw materials from the batch manufacturing process, but recent recycled raw material composition testing conducted at the Facility provides the average weight percentages of the following raw materials:*

- *33.09% O-Xylene*
- *13.28% Aniline*
- *13.12% Phenol*
- *22.49% O-Toluidine*
- *0.61% Hydroquinone*
- *2.93% Nailax*
- *1.88% Water*

Climate Leadership and Community Protection Act (CLCPA) Analysis

8. **Section 4:** Please evaluate the future Greenhouse Gas (GHG) emissions resulting from this project and add a discussion comparing the current GHG emissions to future GHG emissions. The expected change in GHG emissions resulting from the operation of the thermal oxidizer should be included.

9. **Section 4.4:** Please quantify the estimated 2050 GHG emissions.

10. **Section 6:** Per DEP 24-1, "co-pollutants" include all regulated air contaminants. However, the analysis only discusses HAP emissions from the facility. Please add information and discussion regarding other pollutants emitted from the facility.

11. **Section 6.1**: The analysis indicates that there are no published HAP emission factors for diesel/gasoline vehicles. However, as discussed in the mobile emissions addendum to DEP 24-1, the AFLEET tool can be used to determine co-pollutant emissions from vehicle traffic, including gasoline and diesel vehicles. The AFLEET tool does not calculate HAP emissions, but as discussed in the comment above, the 7(3) analyses should include all co-pollutants. Please revise this section to include all co-pollutants.

12. **Appendix F-2:** On the bottom row of the *Facility-Wide Direct Actual GHG Emissions* tables, "The Total Direct Emissions as CO2e" are mislabeled as "Total Upstream Emissions as CO2e" for each calendar year.

13. **Appendix F-2:** Please revise the emission calculations or provide an explanation for the discrepancies described below. Please note that changing the emission totals will affect the "Grand Total CO2e" values and the emissions reported in Table 1 of Section 4.2.1.

a. **Appendix F-2; 2020:** Carbon dioxide equivalents (CO2e) upstream emission totals associated with methane (CH4) are reported as 2,835 MT-/year. NYSDEC has calculated 1179 MT/year.

b. **Appendix F-2; 2021, 2022, 2023, and 2024**: Both the CO2e direct emission totals and upstream emission totals associated with methane are significantly different from what NYSDEC has calculated.

For example, in the 2021 Combustion Emissions table, 1,693 MT/year of CO2e was reported as the total direct emissions associated with CH4. 13.5 MT/year was calculated by NYSDEC.

(CH4 from Natural Gas) + (CH4 from Propane) + (CH4 from Diesel) + (CH4 from Gasoline) = CH4 total

0.16 MT CH4 + .0009 MT CH4 + .00008 MT CH4 + .00003 MT CH4 = .161 MT CH4 total

0.161 MT CH4 * 84 (GWP) = **13.5 MT CO2e / year from Methane.**

<u>Best Available Control Technology (BACT) Evaluation</u>

14. **Section 5.2.1**: Please provide references to the sources used to find the optimal exhaust flow range and used to assert that reduced VOC control efficiency occurs when exhaust flow rates are outside the optimal exhaust flow range.

15. "**Option 2: Carbon Adsorption**": Please add a justification or provide the source for 10% adsorption efficiency used in the calculations.

16. "**Option 2: Carbon Adsorption**": Please revise the "Based on Total Annualized Cost" cost effectiveness value. The "Annualized Capital Cost" is accounted for in the "Total Annualized Cost" and should not be included in the calculation.

Based on Total Annualized Cost = Annualized Capital Cost / tons/year

Based on Total Annualized Cost= $81,675.96/year / .005 tons/year

Based on Total Annualized Cost = $16,335,192 / ton

If you have any questions regarding the technical comments on the air permit application, please contact Ethan Bennett at 716/851-7130.

Sincerely,

Lisa M. Czechowicz
Regional Permit Administrator

ec: Cheryl Webster, P.E., NYSDEC Regional Air Pollution Control Engineer
Ethan Bennett, NYSDEC, Division of Air Resources
Brian Crandall, NYSDEC Albany, Air Pollution Meteorologist
Matthew Ninneman, NYSDEC Albany, Research Scientist 1
David Murtha, ERM Consulting & Engineering, Inc.
Denise Seiler, Goodyear, Plant Manager