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Air Enforcement: Arkansas Department of Energy & Environment - Division of Environmental Quality and Texarkana Tire Manufacturing Facility Enter into Consent Administrative Order

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The Arkansas Department of Energy & Environment – Division of Environmental Quality (“DEQ”) and the Goodyear Tire & Rubber Company (“Goodyear”) entered into a May 13th Consent Administrative Order (“CAO”) addressing an alleged violation of an air permit. See LIS No. 24-087.

The CAO provides that Goodyear owns and operates a tire manufacturing facility (“Facility”) in Texarkana, Arkansas.

The Facility operates pursuant to an air permit.

DEQ is stated to have reviewed an emissions test report submitted on March 6, 2023. The Facility is stated to have operated at 81.76% production during the test.

A review of the emissions test report is stated to have indicated that the Facility failed to reduce the input stream of VOCs by ninety-eight weight percent during testing at SN-133, violating Specific Condition 11 of the air permit.

DEQ subsequently informed Goodyear of the violation. It acknowledged that Goodyear was approved for an extension of the retesting deadline for March 6, 2023, to April 9, 2023.

Goodyear on March 30, 2023, submitted a test protocol for SN-133 and SN-134 and requested to use an alternative method for testing. DEQ approved the use of EPA Reference Method 320 as an alternative method for testing.

Goodyear performed emissions testing at SN-133 on April 6 and 7, 2023, for VOCs.

On May 23, 2023, Goodyear requested an extension to conduct further re-testing at SN-133 for a period not to exceed six months. Goodyear detailed a number of actions that it had taken.

DEQ responded to May 23, 2023, correspondence providing that there was no testing deadline to extend. The agency stated that because the RTO is subject to CO LIS: 22-090, there is no specified date to bring the Facility and unit into compliance.

Goodyear submitted emissions test results for VOC testing at SN-133 on June 6, 2023. Further, in the June 6 correspondence, Goodyear noted actions it had taken and identified two possible reasons for a failed emissions test.

The CAO provides that the review of the emissions test results submitted on June 6, 2023, indicated that Goodyear failed to reduce the input stream of VOCs by ninety-eight weight percent during testing at SN-133, violating Specific Condition 11 of the air permit.

DEQ personnel conducted an inspection of the Facility on August 10, 2023. The inspection covered the reporting period of August 1, 2021, through June 30, 2023.

The inspection is stated to have determined that Goodyear exceeded the VOC content limit on two paint products. This act is stated to have violated Specific Conditions of certain air permits held by the Facility.

In response to a DEQ query, Goodyear stated that it would submit a permit modification application to raise the VOC limits.

Goodyear submitted a minor permit modification to DEQ to increase the VOC limits at SN-68 and SN-106 on December 4, 2023.

Goodyear neither admits nor denies the factual and legal allegations contained in the CAO.

The CAO requires that within 15 calendar days of its effective date that Goodyear submit a compliance plan and schedule to DEQ for review and approval to get SN-133 into compliance with the air permit. Further, within 15 calendar days of the effective date of the CAO Goodyear is required to submit a test protocol for VOC testing at SN-133. In addition, within 30 calendar days after the test protocol is submitted, Goodyear shall conduct emissions testing for VOC at SN-133. Finally, within 30 calendar days after the emissions testing at SN-133, Goodyear shall submit the emissions test results for SN-133 to DEQ.

The CAO provides that in the event the emissions test is failed, within 30 calendar days after the determination of failure, Goodyear shall submit a permit modification application to adjust the permitted emission rates for VOC at SN-133.

The CAO assesses a civil penalty of \$15,320. Further, in the event Goodyear fails the emissions test for VOC at SN-133, the company agrees to pay an additional \$5,740.

A copy of the CAO can be downloaded [here](#).