



May 6, 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:

**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 AERMOD Air Dispersion Modeling Protocol & Part 212 Analysis (the protocol) for the Goodyear Tire & Rubber Company's Niagara Falls manufacturing facility (DEC ID: 9-2911-00036), dated March 27, 2026, submitted by David Murtha, ERM Consulting & Engineering. The protocol is conditionally approved. A revised protocol that fully addresses the comments provided in this letter is necessary for acceptance of the modeling files and final modeling report. Please submit the final modeling report that includes a revised protocol by **June 11, 2026**. The following items must be addressed by Goodyear in the revised protocol:

1. Please include and properly cite any referenced appendices, tables, or figures in the final report package. The final report should function as a standalone document. For example, Section 4 of the protocol refers to Appendix B-1 and B-2. These appendices are not included nor listed in the Table of Content of the March 2026 protocol submission.
2. **Section 5.1:** Please clarify when the inhalation cancer risk of aniline and ortho-toluidine will be assessed whether that is before or after the installation and stack testing of permanent controls.
3. **Section 5.1:** Please revise the inhalation cancer risk calculations for aniline and ortho-toluidine. The inhalation cancer risk is calculated by dividing the annual maximum model-predicted concentrations by the respective annual guideline concentrations, as shown below:

$$\text{Risk}_A \text{ (unitless)} = C_A \text{ (}\mu\text{g/m}^3\text{)} / \text{AGC}_A \text{ (}\mu\text{g/m}^3\text{)}$$
$$\text{Risk}_{O-T} \text{ (unitless)} = C_{O-T} \text{ (}\mu\text{g/m}^3\text{)} / \text{AGC}_{O-T} \text{ (}\mu\text{g/m}^3\text{)}$$

4. **Section 5.3:** Please correct the typo in the section header by moving the "1.88% Water" from the heading for Section 5.3 to the list at the end of Section 5.2.

5. **Section 5.3:** For the fugitive volume source, please describe how the horizontal and vertical dimensions were derived. A schematic figure of the “rooftop” fugitives escaping the top of the main structure would be helpful.
6. **Section 5.4:** Tables 5-3, 5-4 and 5-5 are mislabeled in the protocol narrative. Please revise the references included in Section 5.4 to the accurate tables.
7. In the table containing NYSDEC’s comments and Goodyear’s corresponding response, Goodyear’s response to comment 2 states that although it will be modeled, o-toluidine does not exceed its mass emission limit (MEL). Per Table 4-1, the maximum actual emissions of o-toluidine is 279 lbs/yr, which exceeds its MEL of 100 lbs/yr.

Please note that additional AERMOD Air Dispersion modeling after stack testing of permanent controls are installed is required under Milestone 8 of the Consent Order dated January 14, 2025.

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

Sincerely,


Lisa M. Czechowicz
Regional Permit Administrator

LC:JB

ec: Cheryl Webster, P.E., NYSDEC Regional Air Pollution Control Engineer
Ethan Bennett, P.E., NYSDEC, Division of Air Resources
Elvira Brankov, NYSDEC, Air Pollution Meteorologist
Brian Crandall, NYSDEC Albany, Air Pollution Meteorologist
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David Murtha, ERM Consulting & Engineering, Inc.
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