

From: [Air.Pollution Control](#)
To: [APC Permitting](#)
Subject: FW: [EXTERNAL] 37-0001 -- Holliston Agreement Letter
Date: Tuesday, May 23, 2023 3:35:06 PM
Attachments: [Holliston 37-0001 --- Signed Agreement Letter May 23 2023.pdf](#)
Importance: High

From: Suresh Santanam <suresh@s-squareconsulting.com>
Sent: Tuesday, May 23, 2023 2:05 PM
To: Derek Briggs <Derek.Briggs@tn.gov>
Cc: 'Eric Cook' <ecook@holliston.com>; Air.Pollution Control <Air.Pollution.Control@tn.gov>
Subject: [EXTERNAL] 37-0001 -- Holliston Agreement Letter
Importance: High

***** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. *****

Good Afternoon Derek,

Attached please find a duly executed agreement letter requested by TDEC in support of the T5 air permit renewal for Holliston Holdings, LLC facility in Church Hill, TN.

This letter has been prepared as per our discussions, and is based on input and sample provided by you.

We truly appreciate your time and support to complete this documentation.
Thank you.

Sincerely,

Suresh ...

Suresh Santanam, P.E.
Principal
S-Square Consulting, LLC

Jacksonville, FL 32257
315-480-4889



Holliston Holdings LLC
905 Holliston Mills Rd.
Church Hill, TN. 37642
www.holliston.com



423-357-6141 *phone*
800-251-0251 *customer service*
423-357-3893 *int'l phone*
800-325-0351 *fax*

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

RE: Permit Agreement Letter
Holliston Holdings, LLC
[905 Holliston Mills Road, Church Hill, TN 37642]
Emission Source Reference: APC Facility ID 37-0001 - Source #s 02 and 12 / Permit No. 580610

Dear Technical Secretary:

On behalf of Holliston Holdings, LLC, the following limitations are agreed upon for listed sources for the above referenced facility:

Source # 02 (39 MMBtu/hr Springfield Boiler)

- Sulfur dioxide emitted from the 39 MMBtu/hr Springfield Boiler shall not exceed 39.0 tons per calendar year from the use of No. 6 oil. This yearly limit was established to avoid PSD as a result of adding No.6 oil capability. This limitation will also keep other emitted pollutants, during No. 6 fuel oil firing, to be below their respective applicable PSD limits.

Holliston Holdings, LLC shall demonstrate compliance with this limit by recordkeeping of monthly No. 6 fuel oil use, on a calendar month basis, and using the applicable AP-42 Emission Factor for sulfur dioxide (provided in Attachment III of the above referenced permit) to calculate monthly sulfur dioxide emissions, and to sum the calculated calendar monthly sulfur dioxide emissions to compute calendar year total sulfur dioxide emissions. Calculated sulfur dioxide emissions shall be presented with at least one significant digit after the decimal point. Compliance with other applicable PSD pollutant limits will be demonstrated using the same procedure used for sulfur dioxide. [Note: Sulfur dioxide emissions cap to avoid PSD limit was originally established under a construction permit issued by TDEC dated May 25, 2000, and subsequently memorialized through Permit Condition E5-5 of the facility's Title V air permit, and in subsequent renewals of the permit.



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Source # 12 (29.41 MMBtu/hr Boiler)

- Sulfur dioxide emitted from the 29.41 MMBtu/hr Springfield Boiler shall not exceed 39.16 tons per calendar year from the use of No. 4 oil. This yearly limit was established to avoid PSD as a result of adding No. 4 oil capability. This limitation will also keep other emitted pollutants, during No. 4 fuel oil firing, to be below their respective applicable PSD limits.

Holliston Holdings, LLC shall demonstrate compliance with this limit by recordkeeping of monthly No. 4 fuel oil use, on a calendar month basis, and using the applicable AP-42 Emission Factor for sulfur dioxide (provided in Attachment III of the above referenced permit) to calculate monthly sulfur dioxide emissions, and to sum the calculated calendar monthly sulfur dioxide emissions to compute calendar year total sulfur dioxide emissions. Calculated sulfur dioxide emissions shall be presented with at least one significant digit after the decimal point. Compliance with other applicable PSD pollutant limits will be demonstrated using the same procedure used for sulfur dioxide. [Note: Sulfur dioxide emissions cap to avoid PSD limit was originally established under an agreement letter with TDEC dated January 4, 2005, and subsequently memorialized through Permit Condition E10-5 of the facility's Title V air permit, and in subsequent renewals of the permit.

Should you have any questions or require additional information, please contact Eric Cook via phone at 216-212-7787 or via e-mail at ecook@holliston.com.

On behalf of Holliston Holdings, LLC, I agree to the above limitations. I am authorized to represent and bind the facility in environmental affairs.

Signature:



Name (Printed): Eric Cook

Title: President

Date:

5/23/23