

From: [Air.Pollution Control](#)
To: [APC Permitting](#)
Subject: FW: AHF Products dba Crossville, Inc. Plant 1 - Facility ID: 18-0086- Additional information requested
Date: Monday, March 11, 2024 1:34:34 PM
Attachments: [image001.png](#)
[Source 18-0086 AHF Products dba Crossville Agreement Letter Revision 2.pdf](#)
[167499P and 069919P Letter from State.pdf](#)
[AHF Products Source 18-0086 APC 202.pdf](#)

From: Younes Aleali <Younes.Aleali@tn.gov>
Sent: Monday, March 11, 2024 10:59 AM
To: Air.Pollution Control <Air.Pollution.Control@tn.gov>
Cc: Lacey Hardin <Lacey.Hardin@tn.gov>
Subject: FW: AHF Products dba Crossville, Inc. Plant 1 - Facility ID: 18-0086- Additional information requested

Would you please log attached documents plus the text of the email.

Thanks,

From: Derrick Patterson <dpatterson@crossvilleinc.com>
Sent: Monday, March 11, 2024 10:17 AM
To: Younes Aleali <Younes.Aleali@tn.gov>
Cc: Lacey Hardin <Lacey.Hardin@tn.gov>; Will Collins <Will.Collins@tn.gov>; Bry Roberson <broberson@Ensaf.com>; Michael Briggs <michael.briggs@ahfproducts.com>; Tracy Kefauver <Tracy.Kefauver@tn.gov>
Subject: [EXTERNAL] Re: AHF Products dba Crossville, Inc. Plant 1 - Facility ID: 18-0086- Additional information requested

Good morning,

Please see the revised letter attached. Sources 28, 29, and 30 were corrected and should match what is permitted.

We received notification from the state last year that gave us the option to convert sources 32 & 34 to permit by rule. That letter and application are attached as well.

From: Younes Aleali <Younes.Aleali@tn.gov>
Sent: Sunday, March 10, 2024 6:47 PM
To: Derrick Patterson <dpatterson@crossvilleinc.com>
Cc: Lacey Hardin <Lacey.Hardin@tn.gov>; Will Collins <Will.Collins@tn.gov>; Bry Roberson <broberson@Ensaf.com>; Michael Briggs <michael.briggs@ahfproducts.com>; Tracy Kefauver <Tracy.Kefauver@tn.gov>
Subject: RE: AHF Products dba Crossville, Inc. Plant 1 - Facility ID: 18-0086- Additional information

requested

CAUTION: This email originated from outside of AHF Products. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspicious email to AHF.IT@AHFProducts.com.

Dear Mr. Patterson,

During the process of drafting your operating permit, we noticed that in your most recent agreement letter, you have requested a PM emission limit of **0.46** lbs/hr at source 18-0086-30. The current permit and the original construction permit have limit the PM emissions to **0.063** lbs/hr. This limit is based on the baghouse manufacturer's guaranteed emission rate of 0.003 gr/dscf with a 25% safety factor. The requested increase in PM emissions according to TAPCR 1200-03-09, needs a construction permit and must be applied for and received prior to making this change. This is also true at source 18-0086-29, which according to your original agreement letter, the current PM limit is **0.063** lbs/hr and you have requested a limit of **0.1** lb/hr. (we cannot increase a limit in an operating permit).

Therefore, please submit a revised agreement letter, necessary to process your applications.

Meanwhile, you have included calculations for two Emergency Stationary Compression Ignition engines (ICE) at Sources 18-0086-32, and Source 18-0086-34. According to our database, these engines are listed as "inactive" sources. Please clarify.

Sincerely,



Younes Aleali | TDEC-Environmental Protection Specialist 3
Division of Air Pollution Control

William R. Snodgrass Tennessee Tower, 15th Floor
312 Rosa L. Parks Avenue,
Nashville, TN 37243
p. 615-532-0541

Younes.Aleali@tn.gov.

<http://www.tn.gov/environment/air.shtml>

Tell us how we're doing. [Take our TDEC customer service survey.](#)

From: Derrick Patterson <dpatterson@crossvilleinc.com>

Sent: Monday, February 26, 2024 2:33 PM

To: Younes Aleali <Younes.Aleali@tn.gov>

Cc: Lacey Hardin <Lacey.Hardin@tn.gov>; Will Collins <Will.Collins@tn.gov>; Bry Roberson <broberson@Ensaf.com>; Michael Briggs <michael.briggs@ahfproducts.com>; Tracy Kefauver

<Tracy.Kefauver@tn.gov>

Subject: [EXTERNAL] Re: AHF Products dba Crossville, Inc. Plant 1 - Facility ID: 18-0086

Hi Younes,

It's all one large document. There is a reference table along with the calculations written out.

From: Younes Aleali <Younes.Aleali@tn.gov>

Sent: Monday, February 26, 2024 2:28 PM

To: Derrick Patterson <dpatterson@crossvilleinc.com>

Cc: Lacey Hardin <Lacey.Hardin@tn.gov>; Will Collins <Will.Collins@tn.gov>; Bry Roberson <broberson@Ensaf.com>; Michael Briggs <michael.briggs@ahfproducts.com>; Tracy Kefauver <Tracy.Kefauver@tn.gov>

Subject: RE: AHF Products dba Crossville, Inc. Plant 1 - Facility ID: 18-0086

CAUTION: This email originated from outside of AHF Products. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspicious email to AHF.IT@AHFProducts.com.

Mr. Patterson,

I had a quick glance at your submittal, and unless I'm missed it, didn't see your un-controlled HAPs emission calculations, the focal point of our discussion two weeks back. We need these clear un-controlled calculations to determine the status of your facility. Otherwise, it appears your facility status is a synthetic Minor source for taking the limit of 9.9 tons per year for any single HAP emissions.

Please confirm / verify.

Sincerely,



Younes Aleali | TDEC-Environmental Protection Specialist 3
Division of Air Pollution Control

William R. Snodgrass Tennessee Tower, 15th Floor
312 Rosa L. Parks Avenue,
Nashville, TN 37243
p. 615-532-0541

Younes.Aleali@tn.gov.

<http://www.tn.gov/environment/air.shtml>

Tell us how we're doing. [Take our TDEC customer service survey.](#)

From: Derrick Patterson <dpatterson@crossvilleinc.com>
Sent: Monday, February 26, 2024 1:30 PM
To: Younes Aleali <Younes.Aleali@tn.gov>
Cc: Lacey Hardin <Lacey.Hardin@tn.gov>; Will Collins <Will.Collins@tn.gov>; Bry Roberson <broberson@Ensafe.com>; Michael Briggs <michael.briggs@ahfproducts.com>; Tracy Kefauver <Tracy.Kefauver@tn.gov>
Subject: [EXTERNAL] Re: AHF Products dba Crossville, Inc. Plant 1 - Facility ID: 18-0086

***** 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,

Sorry for the delay but we've recently gone through an organizational change. The responsible official has changed so it took a couple days longer to get a signature. I will send the appropriate form for that as well.

I've resubmitted the letter and along with the maximum potential emissions calculations and included it in this email as well.

Please let me know if you have any questions. Thanks

From: Younes Aleali <Younes.Aleali@tn.gov>
Sent: Friday, February 23, 2024 2:24 PM
To: Derrick Patterson <dpatterson@crossvilleinc.com>
Cc: Lacey Hardin <Lacey.Hardin@tn.gov>; Will Collins <Will.Collins@tn.gov>
Subject: AHF Products dba Crossville, Inc. Plant 1 - Facility ID: 18-0086

CAUTION: This email originated from outside of AHF Products. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspicious email to AHF.IT@AHFProducts.com.

Mr. Patterson,
FYI, the Division is under pressure to process this application ASAP and we need your un-controlled emissions calculations and the agreement letter, necessary to process your application as we discussed with you las Friday. Please submit this information by February 26, 2024, at the latest.

Thank you for your cooperation in this matter.

Sincerely,



Younes Aleali | TDEC-Environmental Protection Specialist 3
Division of Air Pollution Control

William R. Snodgrass Tennessee Tower, 15th Floor
312 Rosa L. Parks Avenue,
Nashville, TN 37243
p. 615-532-0541

Younes.Aleali@tn.gov.

<http://www.tn.gov/environment/air.shtml>

Tell us how we're doing. [Take our TDEC customer service survey.](#)



March 11, 2024

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 – **Revision #2**
Crossville Inc. Plant #1
346 Sweeney Drive Crossville, TN 38555
Emission Source 18-0086

Dear Ms. Owenby:

On behalf of Crossville Inc., the following permit limitations are agreed upon for the sources listed below, located at the above referenced facility:

Source No. 18-0086-03 Kiln

Particulate Matter: 0.44 pounds per hour from both kilns
Sulfur Dioxide: 3.38 pounds per hour

Source No. 18-0086-04

Particulate Matter: 2.74 pounds per hour
Sulfur Dioxide: 0.005 pounds per hour

Source No. 18-0086-12 (NSPS UUU)

Sulfur Dioxide: 0.01 pounds per hour

Source No. 18-0086-13 Kiln

Particulate Matter: 0.64 pounds per hour and 2.8 tons per year
Sulfur Dioxide: 4.7 pounds per hour
Opacity Limit: 10%

Source No. 18-0086-23 Kiln

Particulate Matter: 0.1 pounds per hour
Sulfur Dioxide: 0.33 pounds per hour
Opacity Limit: 10%

Source No. 18-0086-24 Kiln

Particulate Matter: 0.2 pounds per hour
Sulfur Dioxide: 1.0 pounds per hour
Opacity Limit: 10%

Crossville, Inc. PO Box 1166 Crossville, TN 38557

Phone 931.484.2110
Fax 931.484.3418

E-Mail Crossc@Crossvilleinc.com
Web Crossvilleinc.com

Source No. 18-0086-26 Baghouse

Particulate Matter: 0.5 pounds per hour

Opacity Limit: 10%

Source No. 18-0086-28 Baghouse

Particulate Matter: 0.46 pounds per hour

Opacity Limit: 10%

Source No. 18-0086-29 Baghouse

Particulate Matter: 0.063 pounds per hour

Opacity Limit: 10%

Source No. 18-0086-30 Baghouse

Particulate Matter: 0.063 pounds per hour

Opacity Limit: 10%

The maximum emission rate from the entire facility for any single hazardous air pollutant (HAP), listed pursuant to Section 112(b) of the Federal Act, shall not exceed 9.9 tons per year. Total emissions of all HAPs from the entire facility shall not exceed 24.9 tons per year. Uncontrolled maximum potential emissions calculations based on each source's designed maximum input rate are attached.

For the above referenced sources **18-0086-03, 18-0086-13, 18-0086-23, and 18-0086-24**, Crossville Inc. shall assure compliance with the agreed particulate matter and sulfur dioxide limitations by not exceeding the respective material and heat input limits for these kilns, and by only using natural gas or propane fuel.

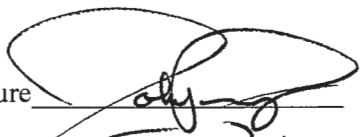
For the above referenced source **18-0086-04**, Crossville Inc. shall assure compliance with agreed particulate matter and sulfur dioxide limitations by not exceeding the established material and heat input limits, by only operating with and properly maintaining a wet scrubber control device, and by only using natural gas or propane fuel.

For the above referenced source **18-0086-12**, Crossville Inc. shall assure compliance with agreed sulfur dioxide limitations only using natural gas or propane fuel.

For the above referenced sources **18-0086-26, 18-0086-28, 18-0086-29, and 18-0086-30**, Crossville Inc. shall assure compliance with particulate matter limitations by only operating with and properly maintaining the baghouse control devices associated with each of these emission units.

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

Signature



Date

3/11/24

Name (printed)

John Paul

Title

VP of Manufacturing/Operations



STATE OF 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
615-532-0554

November 10, 2023

Crossville, Inc. dba Plant 1
Mr. Greg Mather
PO Box 1168
Crossville, TN 38557

Re: Facility ID # 18-0086
Permit Number: 067499P; 069919P

Dear Mr. Mather or responsible official:

The Division of Air Pollution Control is completing file reviews to identify permits approaching their expiration date. It has come to our attention that permit numbers **067499P** and **069919P** are due to expire **March 1, 2024**

Pursuant to Tennessee Comprehensive Rules and Regulations 1200-03-09.02(3)(a), an application for an operating permit shall be filed with the Technical Secretary not less than sixty (60) days prior to the expiration of an existing operating permit. Therefore, the deadline to submit a Notice of Intent or renewal application for all of your emergency generators is **December 31, 2023**.

The Division recently implemented Permit-by-Rule (PBR) for stationary internal combustion engines/generators. Rather than applying for a site-specific permit, owners can now instead opt to be covered by PBR. PBR is not a permit, but it does satisfy permitting requirements. This option allows owners of such facilities to submit a Notice of Intent for authorization under Permit-by-Rule, and receive a Notice of Authorization (NOA) to construct, modify, or operate their stationary emergency engine. **The Notice of Authorization will take the place of the permit that was previously written specifically for your facility.** The advantage of using PBR is that the NOA is valid for the life of the source without having to worry about periodic renewals, and there are currently no associated application fees or annual emission fee assessments.

The Notice of Intent APC 202 form (CN-1514), may be submitted via email to Air.Pollution.Control@tn.gov. The submittals must be signed, dated, and in PDF format. Please

include your Facility ID as well. If preferred, paper documents can be mailed to the Technical Secretary at the address included on the form. An APC 202 Notice of Intent form is enclosed for your convenience, and can also be downloaded from the Division's website by visiting:

<https://www.tn.gov/environment/sbeap/pbr.html>

Additional information for stationary internal combustion engines/generators can be found by visiting:

<https://www.tn.gov/environment/sbeap/engines.html>

Note: In addition to the Permit-by-Rule or permitting requirements of NSPS 4I or 4J, or NESHAP 4Z, all Stationary Emergency Internal Combustion Engines must also meet the requirements of Tennessee Comprehensive Rules and Regulations 1200-03-09.

If assistance is needed, or if you prefer the option to submit a renewal application, the Small Business Environmental Assistance Program (SBEAP) is a free, confidential, technical program within TDEC that can help. This program is able to assist with completing applications including calculations as well as any other environmental questions that a small business may have. The SBEAP can be contacted at **800-734-3619** or by email at BGSBEAP@tn.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "James P. Johnston".

James P. Johnston, PE
Deputy Director
Permitting & Regulatory Development

Tell us how we're doing. <http://tn.gov/environment/article/contact-tdec-customer-service-form>



DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor, Nashville, TN 37243
Telephone: (615) 532-0554, Email: Air.Pollution.Control@TN.gov

APC 202

**NOTICE OF INTENT (NOI) FOR DIVISION OF AIR POLLUTION
CONTROL PERMIT-BY-RULE (PBR)**

FACILITY INFORMATION			
Organization's legal name AHF Products			
Facility name (if different from legal name) Plant 1			
Site address (St./Rd./Hwy.) 346 Sweeney Drive		County name Cumberland	
City Crossville		Zip code 38555	
CONTACT INFORMATION (RESPONSIBLE PERSON)			
Responsible person/Authorized contact Greg Mather		Phone number with area code 931-484-2110	
Mailing address (St./Rd./Hwy.) 349 Sweeney Drive		Fax number with area code	
City Crossville	State TN	Zip code 38555	Email address gmather@crossvilleinc.com
CONTACT INFORMATION (TECHNICAL)			
Principal technical contact Derrick Patterson		Phone number with area code 931-484-2110	
Mailing address (St./Rd./Hwy.) 346 Sweeney Drive		Fax number with area code	
City Crossville	State TN	Zip code 38555	Email address dpatterson@crossvilleinc.com
TYPE OF NOTIFICATION OF AUTHORIZATION (NOA) REQUESTED			
<input type="checkbox"/> New Construction	<input type="checkbox"/> Existing Source w/o Permit	<input checked="" type="checkbox"/> Replace Existing Permit with PBR	<input type="checkbox"/> Change of Ownership
Construction Starting Date:		Emission Source Reference Number: 18-0086-32; 18-0086-34	
Construction Completion Date:		Existing Permit Number: 067499P; 069919P	
Describe changes and/or modifications that have been made, since the last permit application or NOI: None			

PERMIT-BY-RULE CATEGORY			
For which PBR category is an NOA being requested? Potentially eligible categories are listed at Tenn. Comp. R. & Regs. 1200-03-09-.07(5).			
Gasoline Dispensing Facility	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	If Auto Body refinishing facility is not subject to 40 CFR 63 Subpart HHHHHH Miscellaneous Surface Coating and Paint Stripping rule (6H rule), complete Opt-Out petition instead of this form
Auto body refinishing subject to 6H	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	
Stationary emergency engine	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	
CERTIFICATION OF ELIGIBILITY			
The facility at which this source is located does not have the potential to emit 100 tons per year or greater of any air pollutant subject to regulation and has not taken limits to reduce its potential to emit below this threshold.		Agree <input checked="" type="checkbox"/>	Disagree <input type="checkbox"/>
The facility at which this source is located does not have the potential to emit ten (10) tons per year or more of a single hazardous air pollutant or twenty-five (25) tons per year or more of any combination of hazardous air pollutants and has not taken limits to reduce its potential to emit below these thresholds.		Agree <input checked="" type="checkbox"/>	Disagree <input type="checkbox"/>
The facility is/is not located in a county designated serious, severe, or extreme non-attainment for ozone.		Is <input type="checkbox"/>	Is Not <input checked="" type="checkbox"/>
If the facility at which this source is located is in a county designated serious, severe, or extreme non-attainment for ozone, this source does not have the potential to emit ten (10) tons per year or more of nitrogen oxides or volatile organic compounds.		Agree <input type="checkbox"/>	Disagree <input type="checkbox"/>
SOURCE-SPECIFIC INFORMATION			
Gasoline Dispensing Facilities	Maximum monthly throughput in gallons		
List Pollution Control Devices (equipment such as submerged fill or Stage I vapor controls. If equipment details are known, list them. If not, list if submerged fill or Stage I vapor controls are present)			
Auto Body Refinishing (If facility is not subject to 6H, complete Opt-Out petition instead of this form)	Methylene chloride used?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
List Pollution Control Devices (include paint booths, HVLP, and similar pollution control devices)			

Emergency Stationary Engine(s) – Please complete the following information for all emergency stationary engines. If additional room is needed, please attach a separate page with the remaining engines and required information.

Number of Engines	Brief Description of Engine Purpose	Operated only during emergencies ¹	Engine Manufacture Date(s) (approximate) ²	Engine Capacity in Horsepower ³	Engine Fuel Type(s)	List Pollution Control Devices (such as low NOX burner)
1	Emergency Generator (source 32)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	1992	380	Diesel	
1	Emergency Generator (source 34)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	1986	355	Diesel	
		Yes <input type="checkbox"/> No <input type="checkbox"/>				
		Yes <input type="checkbox"/> No <input type="checkbox"/>				
		Yes <input type="checkbox"/> No <input type="checkbox"/>				
		Yes <input type="checkbox"/> No <input type="checkbox"/>				
		Yes <input type="checkbox"/> No <input type="checkbox"/>				

¹ A maximum of 100 hours of non-emergency operation per calendar year as allowed within the provisions of the rule.

² If an engine is known to be manufactured prior to April 2005, you may indicate 'manufactured prior to April 2005' without having to approximate the manufactured date.

³ If the engine serves a generator, be sure to list the engine power output, not the generator electrical output.

SIGNATURE

Based upon information and belief formed after a reasonable inquiry, I, as the responsible person of the above mentioned facility, certify that the information contained in this application and any attached application(s) is accurate and true to the best of my knowledge. As specified in TCA Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Responsible person signature (application must be signed before it will be processed)

Greg Mather

Date

12/6/23

Responsible person printed name

Greg Mather

Title

President

Phone number with area code

931-456-3903