2011 JUL 19 MH 2:1

Heraeus

1975 Knoxville Highway Wartburg, TN 37887 Phone (423) 346-8200 Fax (423) 346-8655

July 18, 2011

Jeryl W. Stewart
Division of Air Pollution Control Board
9th Floor, L & C Annex
401 Church Street
Nashville, TN 37243-1531

Re: Heraeus Metal Processing, LLC Emission Source 65-0049-09

Addendum to Source Test Report (11/9/2010)

Dear Mr. Stewart:

On November 5, 2010, Heraeus Metal Processing received a letter from Mr. John Trimmer, East Tennessee Permit Program, stating that they had received Heraeus' 30 day pressure drop data required by condition 21 of construction permit no. 962395P and that the recommendation of 1.0 inches of water was acceptable as a minimum value to assure compliance for emission source 65-0049-09.

Furthermore, on January 25, 2011, Heraeus received your letter which stated that you had received and reviewed the emission source test report dated November 9, 2010 and that during the testing, the average furnace temperature was 1,200°F and the average baghouse pressure drop was 2.9 inches of water.

In consideration of these two letters, Heraeus Metal Processing would like to request that the Pressure Drop Limit be established at a minimum of 1.0 inches of water and the Furnace Temperature Limit be established at a minimum of 1,200°F pursuant to permit conditions 18 and 21(c) of permit no. 962395P. It is believed that these permit conditions will allow Heraeus to demonstrate compliance with the particulate and volatile organic compound emissions limits set forth in its permit.

Your help in this matter is greatly appreciated. If you have any questions concerning this matter, please feel free to contact Mr. Jessee McClellan at (423) 346-8200.

Very Respectfully,

Norbert Ritschel V.P. & Plant Manager

cc: Doug Warden

TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION DIVISION OF AIR POLLUTION CONTROL

MEMORANDUM

DATE: July 20, 2011

TO: DEW

FROM: JWS JWS

7/20/2011

SUBJECT: Minimum Temperature and Pressure Drop Values Proposed for 65-0049-09

In a letter dated July 18, 2011, a representative of Heraeus Metal Processing proposed a minimum furnace temperature of 1,200 degrees for the rotary furnace (PES 09) and a minimum baghouse pressure drop of 1.0 inch of water pressure for the baghouse that controls emissions from this source. Based on the margin of compliance demonstrated by the results of the November 9, 2010 source emissions testing; the Compliance Validation Program agrees with the parameters proposed by Heraeus in the July 18, 2011 letter.