

From: [Air.Pollution Control](#)
To: [APC Permitting](#)
Subject: FW: Air Pollution Control
Date: Monday, December 18, 2023 2:28:25 PM
Attachments: [image001.png](#)
[Cover letter signed.pdf](#)
[APC 100 Signed.pdf](#)
[APC 102 Boiler 3 signed.pdf](#)
[APC 102 Extrusion Line 3 and 4 -signed.pdf](#)
[APC 102 Extrusion Lines 3,4A Signed.pdf](#)
[APC 102 Liquid Cure-Signed.pdf](#)
[APC 102 Hose Cure- Signed.pdf](#)

From: Katherine Stephens <Katherine.Stephens@tn.gov>
Sent: Monday, December 18, 2023 10:05 AM
To: Air.Pollution Control <Air.Pollution.Control@tn.gov>
Subject: FW: Air Pollution Control

Additional application forms for Facility 39-0057, Permit #477696

From: Webb, Riley <Riley.Webb@pkoh-ac.com>
Sent: Monday, December 18, 2023 9:31 AM
To: Katherine Stephens <Katherine.Stephens@tn.gov>; Terri Ledsinger <Terri.Ledsinger@tn.gov>
Subject: [EXTERNAL] Air Pollution Control

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

Good morning,

I am reaching out to you guys to let you know that I am sending certified mail with hard copies of all submitted documents to Mrs. Katherine Stephens. If you ladies need anything else, please let me know.

Please see attached documents.

Have a Very Merry Christmas and Happy New Year.

Kind Regards,



Riley Webb
Environmental Health & Safety Coordinator
1921 North Broad ST. Lexington, TN 38351

Office: 731-967-3622

Cell: 731-845-9015

Email: Riley.Webb@pkoh-ac.com



Fluid Routing Solutions, Inc.

December 15, 2023

Katherine Stephens
Environmental Protection Specialist
Division of Air Pollution Control
William R Snodgrass TN Tower 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN. 37243

Hello Katherine,

Thank you for all of your support and assistance with updating our Operating Permit renewal information for FRS – Permit # 477696.. Please accept the Air Permit documentation that was requested to be reviewed and updated from previous calculations. Fluid Routing Solutions has updated all APC 102 documents with regards to actual production numbers per the request. Please review and accept this information to be considered for 2020 air permit application. If there are any questions or concerns, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Riley Webb". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Riley Webb
EHS Coordinator
Fluid Routing Solutions
1921 N Broad Street
Lexington, TN 38351
(731) 968-4281 Ext: 70103
Email: riley.webb@pkoh-ac.com



**NON-TITLE V PERMIT APPLICATION
FACILITY IDENTIFICATION**

Type or print and submit. Attach appropriate source description forms.			
SITE INFORMATION			
1. Organization's legal name and SOS control number [as registered with the TN Secretary of State (SOS)] Fluid Routing Solutions TND 086935723			
2. Site name (if different from legal name) FRS			
3. Is a construction permit application fee being submitted? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> (see instructions for appropriate fee to submit)			
4. Site address (St./Rd./Hwy.) 1921 Broad Street			County name
City Lexington	Zip code 38351		5. NAICS or SIC code 326220 (3052)
6. Site location (in lat. /long.)	Latitude N35° 41' 3.2"	Longitude W88° 23' 9.5"	
CONTACT INFORMATION (RESPONSIBLE PERSON)			
7. Responsible person/Authorized contact Craig Phillips			Phone number with area code (731) 967-3602
Mailing address (St./Rd./Hwy.) 1921 Broad Street			Fax number with area code 731-967-0101
City Lexington	State TN	Zip code 38351	Email address craig.phillips@pkoh-ac.com
CONTACT INFORMATION (TECHNICAL)			
8. Principal technical contact Riley Webb			Phone number with area code (731) 967-3622
Mailing address (St./Rd./Hwy.) 1921 Broad Street			Fax number with area code 731-967-0101
City Lexington	State TN	Zip code 38351	Email address riley.webb@pkoh-ac.com
CONTACT INFORMATION (BILLING)			
9. Billing contact Rhonda Johnson			Phone number with area code (731) 968-4281 Ext: 73705
Mailing address (St./Rd./Hwy.) 1921 Broad Street			Fax number with area code 731-967-0101
City Lexington	State TN	Zip code 38351	Email address rhonda.johnson@pkoh-ac.com

15. Describe changes that have been made to this equipment or operation(s) since the last construction or operating permit application:

* Will not utilize Diesel Fuel at location as back up

*Eliminated the use of Cyclohexanone in all processes

*Boiler #3 - manufacturer date actual is 1997

16. Comments

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 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.

17. Signature (application must be signed before it will be processed)

Date



12-15-23

Signer's name (type or print)

Title

Phone number with area code

Craig Phillips

Plant Manager

(731) 967-3602



NON-TITLE V PERMIT APPLICATION
PROCESS OR FUEL BURNING SOURCE DESCRIPTION

Type or print. Submit with the APC 100.			
GENERAL IDENTIFICATION AND DESCRIPTION			
1. Organization's legal name and SOS control number [as registered with the TN Secretary of State (SOS)] FLUID ROUTING SOLUTIONS, INC.		2. Emission Source Reference Number 39-0057-04	
3. Is this air contaminant source subject to an NSPS or NESHAP rule? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If Yes, list rule citation, including Part, Subpart, and applicable Sections:			
4. Unique Source ID (see instructions) T13602		5. Unique Emission Point ID (see instructions) Boiler #3	
6. Description of air contaminant source Boiler #3 - Natural Gas 600 HP			
7. Type of air contaminant source (Check only one option to the right)			
Process Emission Source: For each process emission source, submit a separate application. (Check at right and complete lines 8, 9, and 14)			<input type="checkbox"/>
Process Emission Source with in process fuel: Products of combustion contact materials heated. For each process emission source, submit a separate application. (Check at right and complete lines 8 through 14)			<input type="checkbox"/>
Non-Process fuel burning source: Products of combustion do not contact materials heated. Complete this form for each boiler or fuel burner and complete a Non-Title V Emission Point Description Form (APC 101) for each stack. (Check at right and complete lines 10 through 14)			<input checked="" type="checkbox"/>
PROCESS EMISSION SOURCE DESCRIPTION AND DATA			
8. Type of operation: Continuous <input checked="" type="checkbox"/> Batch <input type="checkbox"/>		Normal batch time	Normal batches/day
9. Process material inputs and In-process solid fuels	Diagram reference	Input rates (pounds/hour)	
		Design	Actual
A.			
B.			
C.			
D.			
E.			
F.			
G.			
Totals			

* A simple process flow diagram must be attached.

14. Comments

Corrected Manufacture date - the date per on-hand records is 1997.

No fossil fuel can be used for this boiler unless retrofitted piping and refilled of diesel tanks on site should a catastrophic event occur resulting in natural gas unavailability.

Diesel tanks are on site but are void of fuels.

Natural Gas Annual Consumption for Boiler #3 - 693074.29 THERMS

SIGNATURE

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15. Signature**Date**


12-15-23

Signer's name (type or print)
Craig Phillips

Title
Plant Manager

Phone number with area code
(731) 967-3602



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 102

NON-TITLE V PERMIT APPLICATION
PROCESS OR FUEL BURNING SOURCE DESCRIPTION

Type or print. Submit with the APC 100.			
GENERAL IDENTIFICATION AND DESCRIPTION			
1. Organization's legal name and SOS control number [as registered with the TN Secretary of State (SOS)] FLUID ROUTING SOLUTIONS, INC.		2. Emission Source Reference Number 39-0057-06	
3. Is this air contaminant source subject to an NSPS or NESHAP rule? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If Yes, list rule citation, including Part, Subpart, and applicable Sections:			
4. Unique Source ID (see instructions) Cyclohexanone		5. Unique Emission Point ID (see instructions) Extrusion Lines 3 & 4	
6. Description of air contaminant source Extrusion Lines #3 & #4			
7. Type of air contaminant source (Check only one option to the right)			
Process Emission Source: For each process emission source, submit a separate application. (Check at right and complete lines 8, 9, and 14)			<input type="checkbox"/>
Process Emission Source with in process fuel: Products of combustion contact materials heated. For each process emission source, submit a separate application. (Check at right and complete lines 8 through 14)			<input type="checkbox"/>
Non-Process fuel burning source: Products of combustion do not contact materials heated. Complete this form for each boiler or fuel burner and complete a Non-Title V Emission Point Description Form (APC 101) for each stack. (Check at right and complete lines 10 through 14)			<input type="checkbox"/>
PROCESS EMISSION SOURCE DESCRIPTION AND DATA			
8. Type of operation: Continuous <input type="checkbox"/> Batch <input type="checkbox"/>		Normal batch time	Normal batches/day
9. Process material inputs and In-process solid fuels	Diagram reference	Input rates (pounds/hour)	
		Design	Actual
A.			
B.			
C.			
D.			
E.			
F.			
G.			
Totals			

* A simple process flow diagram must be attached.

14. Comments

Cyclohexanone is no longer utilized in any extrusion process.

SIGNATURE

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15. Signature**Date**


12-15-23

Signer's name (type or print)

Title

Phone number with area code

Craig Phillips

Plant Manager

(731) 967-3602



NON-TITLE V PERMIT APPLICATION
PROCESS OR FUEL BURNING SOURCE DESCRIPTION

Type or print. Submit with the APC 100.			
GENERAL IDENTIFICATION AND DESCRIPTION			
1. Organization's legal name and SOS control number [as registered with the TN Secretary of State (SOS)] FLUID ROUTING SOLUTIONS, INC.		2. Emission Source Reference Number 39-0057-06	
3. Is this air contaminant source subject to an NSPS or NESHAP rule? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If Yes, list rule citation, including Part, Subpart, and applicable Sections: EXTRUSTION LN 3, 4A			
4. Unique Source ID (see instructions) EXTRUSTION LN 3, 4A		5. Unique Emission Point ID (see instructions) EXTRUSTION LN 3, 4A	
6. Description of air contaminant source Extrusion Lines 3 and 4A			
7. Type of air contaminant source (Check only one option to the right)			
Process Emission Source: For each process emission source, submit a separate application. (Check at right and complete lines 8, 9, and 14)			<input checked="" type="checkbox"/>
Process Emission Source with in process fuel: Products of combustion contact materials heated. For each process emission source, submit a separate application. (Check at right and complete lines 8 through 14)			<input type="checkbox"/>
Non-Process fuel burning source: Products of combustion do not contact materials heated. Complete this form for each boiler or fuel burner and complete a Non-Title V Emission Point Description Form (APC 101) for each stack. (Check at right and complete lines 10 through 14)			<input type="checkbox"/>
PROCESS EMISSION SOURCE DESCRIPTION AND DATA			
8. Type of operation: Continuous <input checked="" type="checkbox"/> Batch <input type="checkbox"/>		Normal batch time	Normal batches/day
9. Process material inputs and In-process solid fuels	Diagram reference	Input rates (pounds/hour)	
		Design	Actual
A. Rubber hose		605 Combined	347 Combined
B.			
C.			
D.			
E.			
F.			
G.			
Totals			

* A simple process flow diagram must be attached.

14. Comments

Totals for both lines 3 & 4a Actuals - lbs per hour.

Rubber Compounds that best match our products is the EPDM

SIGNATURE

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15. Signature**Date**

Signer's name (type or print)

Title

Phone number with area code

Craig Phillips

Plant Manager

(731) 967-3602



NON-TITLE V PERMIT APPLICATION
PROCESS OR FUEL BURNING SOURCE DESCRIPTION

Type or print. Submit with the APC 100.			
GENERAL IDENTIFICATION AND DESCRIPTION			
1. Organization's legal name and SOS control number [as registered with the TN Secretary of State (SOS)] FLUID ROUTING SOLUTIONS, INC.		2. Emission Source Reference Number 39-0057-16	
3. Is this air contaminant source subject to an NSPS or NESHAP rule? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If Yes, list rule citation, including Part, Subpart, and applicable Sections: Hose Cure Unit			
4. Unique Source ID (see instructions) HOSE CURE		5. Unique Emission Point ID (see instructions) HOSE CURE	
6. Description of air contaminant source Hose cure unit			
7. Type of air contaminant source (Check only one option to the right)			
Process Emission Source: For each process emission source, submit a separate application. (Check at right and complete lines 8, 9, and 14)			<input checked="" type="checkbox"/>
Process Emission Source with in process fuel: Products of combustion contact materials heated. For each process emission source, submit a separate application. (Check at right and complete lines 8 through 14)			<input type="checkbox"/>
Non-Process fuel burning source: Products of combustion do not contact materials heated. Complete this form for each boiler or fuel burner and complete a Non-Title V Emission Point Description Form (APC 101) for each stack. (Check at right and complete lines 10 through 14)			<input type="checkbox"/>
PROCESS EMISSION SOURCE DESCRIPTION AND DATA			
8. Type of operation: Continuous <input checked="" type="checkbox"/> Batch <input type="checkbox"/>		Normal batch time	Normal batches/day
9. Process material inputs and In-process solid fuels	Diagram reference	Input rates (pounds/hour)	
		Design	Actual
A. Rubber/Straight Hose		531 - (7 Combined)	347- (7 Combined)
B.			
C.			
D.			
E.			
F.			
G.			
Totals			

* A simple process flow diagram must be attached.

14. Comments

Actuals equals Vulcanizers #2 - #6 plus 2 Vertical Vulcanizers
 Vulcanizer #7 Main Plant is out of Service
 Vulcanizers #9 & 10 in West Plant are no longer in use.

rubber compounds that best match our products is EPDM.

SIGNATURE

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15. Signature

Date

12-15-23

Signer's name (type or print)

Craig Phillips

Title

Plant Manager

Phone number with area code

(731) 967-3602



NON-TITLE V PERMIT APPLICATION
PROCESS OR FUEL BURNING SOURCE DESCRIPTION

Type or print. Submit with the APC 100.			
GENERAL IDENTIFICATION AND DESCRIPTION			
1. Organization's legal name and SOS control number [as registered with the TN Secretary of State (SOS)] FLUID ROUTING SOLUTIONS, INC.		2. Emission Source Reference Number 39-0057-12	
3. Is this air contaminant source subject to an NSPS or NESHAP rule? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If Yes, list rule citation, including Part, Subpart, and applicable Sections: Liquid Cure Medium Unit			
4. Unique Source ID (see instructions) LIQUID CURE MED		5. Unique Emission Point ID (see instructions) LIQUID CURE MED	
6. Description of air contaminant source Liquid cure unit			
7. Type of air contaminant source (Check only one option to the right)			
Process Emission Source: For each process emission source, submit a separate application. (Check at right and complete lines 8, 9, and 14)			<input checked="" type="checkbox"/>
Process Emission Source with in process fuel: Products of combustion contact materials heated. For each process emission source, submit a separate application. (Check at right and complete lines 8 through 14)			<input type="checkbox"/>
Non-Process fuel burning source: Products of combustion do not contact materials heated. Complete this form for each boiler or fuel burner and complete a Non-Title V Emission Point Description Form (APC 101) for each stack. (Check at right and complete lines 10 through 14)			<input type="checkbox"/>
PROCESS EMISSION SOURCE DESCRIPTION AND DATA			
8. Type of operation: Continuous <input checked="" type="checkbox"/> Batch <input type="checkbox"/>		Normal batch time	Normal batches/day
9. Process material inputs and In-process solid fuels	Diagram reference	Input rates (pounds/hour)	
		Design	Actual
A. Rubber hose		531 -(2 Combined)	91.53 - (2 Combined)
B.			
C.			
D.			
E.			
F.			
G.			
Totals			

* A simple process flow diagram must be attached.

14. Comments

Rubber Compound that best match our products is EPDM.

SIGNATURE

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15. Signature**Date**

12-15-23

Signer's name (type or print)**Title****Phone number with area code**