

## **TITLE V PERMIT STATEMENT**

<b>Facility Name:</b> Heraeus Precious Metals North America, LLC
<b>City:</b> Wartburg
<b>County:</b> Morgan
<b>Facility Number:</b> 65-0049

<b>Date Renewal Application Received:</b> July 2, 2021
<b>Date Application Deemed Complete:</b> July 2, 2021

<b>Emission Source Reference No.:</b> 65-0049-00
<b>Permit No.:</b> 579181
<b>Issued by:</b> S. Auth

### **INTRODUCTION**

This narrative is being provided to assist the reader in understanding the content of the attached Title V operating permit. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-03-09-.02(11)(f)1.(v). The primary purpose of the Title V operating permit is to consolidate and identify existing state and federal air requirements applicable to *Heraeus Precious Metals North America, LLC*, and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

#### **Acronyms**

PSD - Prevention of Significant Deterioration  
NESHAP - National Emission Standards for Hazardous Air Pollutants  
NSPS - New Source Performance Standards  
MACT - Maximum Achievable Control Technology  
NSR - New Source Review

#### **I. Identification Information**

##### **A. Source Description**

List and describe emission source(s): **65-0049 - Heraeus Precious Metals North America, LLC**

Precious metal reclamation facility:

65-0049-01:	Eight roasting ovens, one chamber furnace, one burning chamber, and two afterburners.
65-0049-04:	Six ball mills.
65-0049-09:	Rotary Furnace.
65-0049-11:	Emergency Generator.
65-0049-12:	Six electric furnaces, eight cooling chambers, and two tray furnaces with one afterburner; Milling, polishing, and transfer operations; and three auxiliary furnaces with baghouse control.
65-0049-13:	One Rhodium-Oil Furnace with Baghouse Control.

### **Insignificant Activities**

Insignificant activities are listed in the permit application and in Condition E3-7 of Title V Operating Permit number 579181.

### **B. Facility Classification**

1. Attainment or Non-Attainment Area Location: *Area is designated as an **attainment** area for all criteria pollutants.*
2. Class I or Class II area: *Company is located in a **Class II** area.*

### **C. Regulatory Status**

1. PSD/NSR: *This facility is **not** a major source under **PSD**.*
2. Title V Major Source Status by Pollutant

Pollutant	Is the pollutant emitted?	If emitted, what is the facility's status?	
		Major Source Status	Non-Major Source Status
<b>PM</b>	Yes		X
<b>PM<sub>10</sub></b>	N/A	N/A	N/A
<b>SO<sub>2</sub></b>	Yes		X
<b>VOC</b>	Yes		X
<b>NO<sub>x</sub></b>	Yes		X
<b>CO</b>	Yes		X
<b>Individual HAP</b>	Yes	X	N/A
<b>Total HAPs</b>	Yes	X	N/A
<b>CO<sub>2e</sub></b>	Yes	N/A	X

3. MACT Standards: This facility **is** a major source for HAPs. This facility **is** subject to a proposed or final MACT Standard.  
List MACT Rule(s) if applicable: MACT Subpart ZZZZ

4. Program Applicability: Are the following programs applicable to the facility?  
PSD *No*  
NESHAP *Yes*  
NSPS *Yes*

## **II. Compliance Information**

### **A. Compliance Status:**

Is the facility currently in compliance with all applicable requirements? *yes*

If no, explain.

Are there any applicable requirements that will become effective during the permit term? *no*

If yes, explain.

## **III. Other Requirements**

- A. Emissions Trading: *The facility is **not** involved in an emission-trading program*
- B. Acid Rain Requirements: This facility **is not** subject to any requirements in Title IV of the Clean Air Act.
- C. Prevention of Accidental Releases: **Not Applicable**
- D. The facility is not subject to major source GHGs requirements.

## **IV. Public Participation Procedures**

**A. Notification of this draft permit was mailed to the following environmental agencies:**

1. EPA
2. North Carolina
3. Knoxville Environmental Field Office
4. Knoxville/Knox Co. Dept. of Air Quality Mgt.

**B. Response to Comments**

**General Information**

Date of Public Notice:	November 16, 2022
Date of Public Hearing:	None Requested

**Summary of comments**

Commenter	Comments	Response
EPA	None	None
Public	None	None

**V. Permit History**

**A. Title V Renewal Permit 579181 was issued on December 21, 2022**

Based on Title V Construction permit 979077, this facility will now be a major source of HAPs, removing the single and combined HAP limits. Sources from that permit have not been added to the operating permit at time of renewal, due to not having received start-up certifications. At the time of start-up, they will need to be in compliance with all requirements of the Case by Case MACT found in Section IV of construction permit 979077.

Conditions E1 and E2 were updated, update Fee Emissions table and reporting requirements. HAP emissions were updated, splitting the HAP emissions accordingly in the VOC Family Group, Non-VOC Family Group, and PM Family Group.

Updated Condition E3-6; now a major source for HAPs, adjusted recordkeeping requirements.

Updated Source 01; Tray Furnace burner rating updated to 1.6 MMBtu/hr and added a tolerance to the Oxidizer minimum temperature. HCl and HF emissions did not increase, not requiring modeling to be performed.

Updated Source 04; update flow rate of baghouses, resulting in an increase in potential PM emissions.

Source 06 has been removed from operation and the permit accordingly.

Updated Source 12; Removed coke oven from operation, updated afterburner burner rating to 1.0 MMBtu/hr, and added a tolerance to the afterburner minimum temperature.

Updated Source 13; Rh Furnace burner rating updated to 0.9 MMBtu/hr