

Katherine Stephens

From: Katherine Stephens
Sent: Friday, February 2, 2024 8:14 AM
To: 'Webb, Riley'
Cc: Rose, Joanne; Graff, Dotty; Jill Pratt; Terri Ledsinger
Subject: RE: RE: 39-0057 - Fluid Routing Solutions, LLC - Permit #077696

Good morning Riley,

I can extend your review time until February 8th, but we have already delayed the permit several times for the same reason.

Sincerely,
Katherine

From: Webb, Riley <Riley.Webb@pkoh-ac.com>
Sent: Thursday, February 1, 2024 3:04 PM
To: Katherine Stephens <Katherine.Stephens@tn.gov>
Subject: [EXTERNAL] RE: RE: 39-0057 - Fluid Routing Solutions, LLC - Permit #077696

Good afternoon, Katherine.

We are still calculating numbers on our sources to make sure that we gave you the correct numbers..

Would it be possible to ask for an extension?

From: Katherine Stephens <Katherine.Stephens@tn.gov>
Sent: Thursday, February 1, 2024 12:27 PM
To: Webb, Riley <Riley.Webb@pkoh-ac.com>
Cc: Rose, Joanne <joanne.rose@pkoh-ac.com>; Graff, Dotty <Dotty.Graff@pkoh-ac.com>; Jill Pratt <Jill.Pratt@tn.gov>
Subject: RE: RE: 39-0057 - Fluid Routing Solutions, LLC - Permit #077696

Good afternoon Riley,

Just checking in with you, since Terri has now approved the permit – if you don't have any comments/corrections for me, I will go ahead and issue it on Monday and we will be done (!!).

Let me know if you need more time to review. If the permit looks good, no need to do anything.

Thanks,
Katherine

From: Katherine Stephens
Sent: Monday, January 22, 2024 8:22 AM
To: Webb, Riley <Riley.Webb@pkoh-ac.com>; craig.phillips@pkoh-ac.com
Cc: Rose, Joanne <joanne.rose@pkoh-ac.com>; Graff, Dotty <Dotty.Graff@pkoh-ac.com>; David Hill <david.hill@pkoh.com>; Jill Pratt <Jill.Pratt@tn.gov>; Tawanna Reid <Tawanna.Reid@tn.gov>
Subject: RE: RE: 39-0057 - Fluid Routing Solutions, LLC - Permit #077696

Good morning all,

I am reaching out with a copy of the draft permit and the permit emission summary for your approval. Please note the changes to which sources are permitted and the updated recordkeeping requirements (Appendix 7). I have also incorporated your comments from our review of the previous permit (labeling the boilers, tracking in therms).

Please provide any questions, comments, or concerns on the draft permit by end of day Friday, February 2nd, or let me know if you need additional review time. I am happy to schedule a call or Teams meeting to discuss. Terri Ledsinger will also be reviewing the draft.

Thank you,
Katherine

From: Webb, Riley <Riley.Webb@pkoh-ac.com>

Sent: Friday, January 19, 2024 1:11 PM

To: Katherine Stephens <Katherine.Stephens@tn.gov>

Cc: Rose, Joanne <joanne.rose@pkoh-ac.com>; Graff, Dotty <Dotty.Graff@pkoh-ac.com>; David Hill <david.hill@pkoh.com>

Subject: [EXTERNAL] RE: 39-0057 - Fluid Routing Solutions, LLC - Permit #077696

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Katherine,
Please see the attached document. I will send you a hard copy as well.
Thanks again for your assistance.

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

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Katherine Stephens

From: Webb, Riley <Riley.Webb@pkoh-ac.com>
Sent: Tuesday, December 12, 2023 2:15 PM
To: Katherine Stephens
Subject: [EXTERNAL] RE: Updated Forms

Good afternoon,
I am still working on this; I should be able to complete this next week. Everyone has been out of the office.

From: Katherine Stephens <Katherine.Stephens@tn.gov>
Sent: Tuesday, December 12, 2023 8:49 AM
To: Webb, Riley <Riley.Webb@pkoh-ac.com>; Graff, Dotty <Dotty.Graff@pkoh-ac.com>
Subject: RE: Updated Forms

Good morning,

I am just checking in with both of you. My notes are that we talked on the phone about 3 weeks ago and your engineers had some concerns about the 531 lbs/hr value for the vulcanizers/liquid cure units and you wanted to meet with them and review. Do you have the updated/confirmed production rate numbers?

Thank you,
Katherine

From: Webb, Riley <Riley.Webb@pkoh-ac.com>
Sent: Monday, November 20, 2023 11:39 AM
To: Katherine Stephens <Katherine.Stephens@tn.gov>
Subject: [EXTERNAL] Updated Forms

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Katherine,
I really enjoyed your visit today. Please see attached documents.

Kind Regards,



Riley Webb
Environmental Health & Safety Coordinator
Lexington, TN 38351

Office: 731-967-3622
Cell: 731-845-9015

Email: Riley.Webb@pkoh-ac.com
Address: 1921 North Broad ST. Lexington, TN 38351

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Katherine Stephens

From: Webb, Riley <Riley.Webb@pkoh-ac.com>
Sent: Friday, November 17, 2023 8:04 AM
To: Katherine Stephens
Subject: [EXTERNAL] RE: Non-Title V Permit Application

Good morning,

After looking at your email yesterday afternoon, I believe that I spoke too soon. I am in the process of recalculating the numbers again, just to make sure.

From: Katherine Stephens <Katherine.Stephens@tn.gov>
Sent: Thursday, November 16, 2023 3:18 PM
To: Webb, Riley <Riley.Webb@pkoh-ac.com>
Subject: RE: Non-Title V Permit Application

Good afternoon,

Thank you for sending this – overall it looks good, but I had two quick questions about the curing units to make sure I'm reading it right.

- 1) Is the 531 lbs/hr for each vulcanizer? So a total of 3,717 lbs/hr for Vulcanizers 2-6 and two vertical vessels?
- 2) Is the 531 lbs/hr for each liquid cure? So a total of 1,062 lbs/hr for lines 8 & 9?

The extrusion lines say specifically says it's 605 lbs/hr each, and the other documents look good to me.

Sincerely,
Katherine

From: Webb, Riley <Riley.Webb@pkoh-ac.com>
Sent: Thursday, November 16, 2023 2:39 PM
To: Katherine Stephens <Katherine.Stephens@tn.gov>
Subject: [EXTERNAL] Non-Title V Permit Application

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Katherine,
Please see the attached documents.

Kind Regards,



Riley Webb
Environmental Health & Safety Coordinator
Lexington, TN 38351

Office: 731-967-3622

Cell: 731-845-9015

Email: Riley.Webb@pkoh-ac.com

Address: 1921 North Broad ST. Lexington, TN 38351

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Katherine Stephens

From: Webb, Riley <Riley.Webb@pkoh-ac.com>
Sent: Thursday, November 9, 2023 11:27 AM
To: Katherine Stephens
Subject: [EXTERNAL] FW: Line 3 / 4A - Footage

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From: Scott, Brent <Brent.Scott@pkoh-ac.com>
Sent: Thursday, November 9, 2023 11:09 AM
To: Webb, Riley <Riley.Webb@pkoh-ac.com>
Subject: Line 3 / 4A - Footage

August Numbers

Line 4A -> 403,130'
Line 3 -> 301,799'

Brent Scott
Extrusion Focus Factory Manager



Fluid Routing Solutions
1921 North Broad St.
Lexington TN 38351
Brent.Scott@pkoh-ac.com
Office: 731-800-8047
Cell: 731-535-1253

Katherine Stephens

From: Webb, Riley <Riley.Webb@pkoh-ac.com>
Sent: Wednesday, November 8, 2023 9:28 AM
To: Katherine Stephens
Subject: [EXTERNAL] FW: 39-0057 - Fluid Routing Solutions, LLC - Permit #477696

Is this the information that you were looking for?

From: Estes, James <james.estes@pkoh-ac.com>
Sent: Tuesday, November 7, 2023 4:18 PM
To: Webb, Riley <Riley.Webb@pkoh-ac.com>
Subject: RE: 39-0057 - Fluid Routing Solutions, LLC - Permit #477696

I am not sure if this is what you need from me or not, these numbers are based on 22 hours of production or 1 day of production.

I do not know of a liquid cure; I don't believe we do that.

The straight hose vulcanizers do not record in pcs. its either meters or feet so I did not list them.

Formed hose.

Vul. #2 = 226 PPH

Vul. #3 = 367 PPH

Vul. #4 = 164 PPH

Vul. #5 = 254 PPH

Vul. # 6 = 92 PPH

Vul. # 7 = 0 PPH Is not running currently.

From: Webb, Riley <Riley.Webb@pkoh-ac.com>
Sent: Tuesday, November 7, 2023 2:50 PM
To: Estes, James <james.estes@pkoh-ac.com>; Mercado, Ryan <Ryan.Mercado@pkoh-ac.com>
Subject: FW: 39-0057 - Fluid Routing Solutions, LLC - Permit #477696

From: Katherine Stephens
Sent: Monday, November 6, 2023 2:40 PM
To: 'Webb, Riley' <Riley.Webb@pkoh-ac.com>
Subject: RE: 39-0057 - Fluid Routing Solutions, LLC - Permit #477696

Good afternoon Riley,

Thanks for the quick reply – the APC 102s you attached were in the original application, those are the ones for the three boilers [Source 04]. In the application though, there is also:

- Rubber Extrusion Lines #3 & 4 (using cyclohexanone and S-5995) – [Source 06]

- Is rubber actually being extruded, or is this a gluing line that's mis-labeled? If there's actual rubber extrusion going on, there are some (small) VOC emissions that I need to document. In that case I would need to know the production rate.
- Liquid Cure Process (using oxidizers) – [Source 12]
 - This was previously marked as an insignificant source, which it probably is, but I need to show calculations, so production rate is needed.
- Vulcanizers #2-7 and 2 Vertical Vessels (steam curing) – [Source 16]
 - Same as the liquid cure – production rate needed.

Usually those production rates would be listed on the APC 102 forms in Section 9, but I only see the APC 101 forms for those processes. If you don't have the originals, submitting a new version is fine.

To add on to what I mentioned before, FRS is currently permitted as a "Conditional Major" facility, which requires additional fees and annual reporting. Based on the changes over the last few years, it can probably be reclassified as a "True Minor" facility to remove those requirements, but in order to do so I have to demonstrate that the facility-wide emissions are below the EPA threshold (including the insignificant sources).

Let me know if you have any questions or want to discuss over phone/Microsoft Teams.

Thanks,
Katherine

From: Webb, Riley <Riley.Webb@pkoh-ac.com>
Sent: Monday, November 6, 2023 1:35 PM
To: Katherine Stephens <Katherine.Stephens@tn.gov>
Subject: [EXTERNAL] RE: 39-0057 - Fluid Routing Solutions, LLC - Permit #477696

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Good Afternoon Mrs. Stephens,

I have sent the attached paperwork that you requested. I am new in this position, so please let me know if you need anything else.

Kind Regards,



Riley Webb
 Environmental Health & Safety Coordinator
 Lexington, TN 38351

Office: 731-967-3622
Cell: 731-845-9015

Email: Riley.Webb@pkoh-ac.com
Address: 1921 North Broad ST. Lexington, TN 38351

From: Katherine Stephens <Katherine.Stephens@tn.gov>
Sent: Monday, November 6, 2023 12:22 PM
To: Webb, Riley <Riley.Webb@pkoh-ac.com>; Phillips, Craig <craig.phillips@pkoh-ac.com>
Cc: Jill Pratt <Jill.Pratt@tn.gov>
Subject: 39-0057 - Fluid Routing Solutions, LLC - Permit #477696

Some people who received this message don't often get email from katherine.stephens@tn.gov. [Learn why this is important](#)

Good morning Mr. Phillips and Ms. Webb,

I am reaching out to give you an update on your Air Pollution Control permit and introduce myself. The Division has until recently been understaffed due to a hiring freeze, but we are now addressing permits that have been outstanding and working to issue them.

I am currently working on operating permit #477696 and have a few questions about the rubber production rate for the extruders (Source 06) and the insignificant curing operations (Source 12 and Source 16) – for each of them, I don't see that an APC 102 stating the input rate of rubber was submitted. Can you please submit those forms to Air.Pollution.Control@tn.gov?

I am hoping I can issue you a minor source permit going forward now that the diesel tank and Boiler #5 have been removed. However, I will need to document all the source emissions in detail to do so.

Please let me know if you have any questions about the permitting process.

Thank you,

Katherine Rose Stephens
Environmental Protection Specialist | Air Pollution Control
TN Tower 15th Floor | 312 Rosa L. Parks Avenue
(615) 770-1108 | Katherine.Stephens@tn.gov

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