

Shawn Auth

From: Shea Cofer <shea@stevensehs.com>
Sent: Wednesday, January 31, 2024 9:20 AM
To: Shawn Auth
Cc: andrew.morgan@heraeus.com; Rina Mendoza
Subject: RE: [EXTERNAL] Heraeus Precious Metals North America LLC (65-00449) Title V Operating permit 579181 - 234366 Minor Modification #1
Attachments: VOC results.pdf

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Hey Shawn,

Andrew forwarded your questions to me, so I've provided **responses** below. I separated the questions for clarity. Let me know if you have any questions or want to discuss further.

Previously, SDS were submitted for this process and there was a potential for more HAPs, I believe there was a worst case scenario of 80% HAP content. What has changed from this? **Worst case for the Rh material was 100% VOC which was used to determine the potential VOCs. The 80% may be coming from an old application. The TV renewal application submitted in 2021 clarified that there were no expected VOC HAPs. Phosphorous is included in the calculations and controlled by the baghouse.**

Do you have updated SDS or test reports to verify the content? **Attached.**

Per the letter, it says the total VOCs for the facility would be increased to 91.96, however based on the current Title V permit the limit is 59.39, based on my calculations the new value would be 120.37 tons per year of VOC. The biggest discrepancy I see is that your calculations show Source 12 VOC at 7.36 tpy, but the permit itself states 32.11 tpy. Has something changed with source 12? **When we submitted the TV renewal application, we indicated that potential emissions were 7.36 tpy in the calculations but requested to accept the 32.11 tpy that was previously in the permit. This fact was not considered when the minor mod was submitted. If we retain the 32.11 tpy, the new VOC total would be 116.71 tpy.**

Thanks,
Shea

From: Shawn Auth <Shawn.Auth@tn.gov>
Sent: Thursday, January 25, 2024 9:42 AM
To: Morgan, Andrew N <andrew.morgan@heraeus.com>
Subject: [EXTERNAL] Heraeus Precious Metals North America LLC (65-00449) Title V Operating permit 579181 - 234366 Minor Modification #1

Mr. Morgan,

I had some questions about the October 5, 2023, minor modification letter/application. Previously, SDS were submitted for this process and there was a potential for more HAPs, I believe there was a worst case scenario of 80% HAP content. What has changed from this? Do you have updated SDS or test reports to verify the content? Per the letter, it says the total VOCs for the facility would be increased to 91.96, however based on the current Title V permit the limit is 59.39, based on my calculations the new value would be 120.37 tons per year of VOC. The biggest discrepancy I see is that your calculations show Source 12 VOC at 7.36 tpy, but the permit itself states 32.11 tpy. Has something changed with source 12?

Regards,
Shawn



Shawn Auth | EPS 3
Division of Air Pollution Control
William R. Snodgrass TN Tower, 15th Floor
312 Rosa L. Parks Avenue, Nashville, TN 37243
p. 615-532-6812
Shawn.Auth@tn.gov

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