

From: [Air.Pollution Control](#)
To: [APC Permitting](#)
Subject: FW: Lexington Air Permit
Date: Tuesday, March 12, 2024 2:03:06 PM
Attachments: [image001.png](#)
[Permit Agreement Letter 3-12-24.pdf](#)

From: Webb, Riley <Riley.Webb@pkoh-ac.com>
Sent: Tuesday, March 12, 2024 1:27 PM
To: Air.Pollution Control <Air.Pollution.Control@tn.gov>
Cc: Katherine Stephens <Katherine.Stephens@tn.gov>; Phillips, Craig <craig.phillips@pkoh-ac.com>; Rose, Joanne <joanne.rose@pkoh-ac.com>; David Hill <david.hill@pkoh.com>; Gipple, Lloyd <lloyd.gipple@pkoh-ac.com>
Subject: [EXTERNAL] Lexington Air Permit

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Katherine,
Here is the signed agreement letter. If you need anything else, please let me know.

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



March 12, 2024

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

RE: Permit Agreement Letter
Fluid Routing Solutions, LLC
1921 North Broad Street, Lexington
Emission Source Reference No. 39-0057 / Permit No. 477696

To the Technical Secretary:

On behalf of Fluid Routing Solutions, LLC, the following permit limitations are agreed upon for the above referenced facility in order to opt-out of being issued a major source operating permit pursuant to TAPCR 1200-03-09-.02(11)(a):

- Facility-wide Limitation
 - The maximum carbon disulfide (CS_2), a single Hazardous Air Pollutant (HAP), emitted from this source shall not exceed 9.9 tons during any period of 12-consecutive months.
 - The maximum total Hazardous Air Pollutants (HAPs) emitted from this source shall not exceed 24.9 tons during any period of 12-consecutive months.
 - Compliance with this emission limitations shall be assured by compliance with:
 - the maximum combined material purchased for Source 16 (Hose Curing) not exceeding 30,000,000 pounds of raw rubber during any period of 12-consecutive months;
 - recordkeeping of all raw rubber purchased by the facility during each calendar month and each period of 12-consecutive months to demonstrate compliance with the input rate limit;
 - the use of the CS_2 emission factor of $6.4 \cdot 10^{-4}$ lbs/lb rubber cured from AP-42, Chapter 4.12, Table 3 (Manufacture of Rubber Products);
 - the use of the total HAP emission factor of $9.8 \cdot 10^{-4}$ lbs/lb rubber cured from AP-42, Chapter 4.12, Table 3 (Manufacture of Rubber Products).

Additionally, the following permit limitations are agreed upon for the boilers located at the above referenced facility in order reduce allowable emissions and potential fees:

- Source 04: Fuel Burning Installation (Three Natural Gas-Fired Boilers)
 - The maximum particulate matter (PM) emitted from this source shall not exceed 1.8 pounds per hour on a daily average basis.
 - The maximum sulfur dioxide (SO_2) emitted from this source shall not exceed 0.3 pounds per hour on a daily average basis.
 - Compliance with these emission limitations shall be assured by compliance with:
 - the maximum heat input rate of 25.1 MMBtu/hr for each of the three boilers;
 - the use of natural gas as the only fuel source for the boilers;

- the use of the PM emission factor 7.6 lbs/10⁶ scf from AP-42, Chapter 1.4, Table 2 (Natural Gas Combustion);
- the use of the SO₂ emission factor 0.6 lbs/10⁶ scf from AP-42, Chapter 1.4, Table 2 (Natural Gas Combustion).

Should you have any questions or require additional information, please contact [Riley Webb] via phone at 731-967-3622 or via e-mail at riley.webb@pkoh-ac.com.

On behalf of Fluid Routing Solutions, I agree to the above limitations. I am authorized to represent and bind the facility in environmental affairs.

Signature



Name (printed)

Craig Phillips

Title

Plant Manager

Date

3/12/2024