

CONSTRUCTION PERMIT SUMMARY REPORT

Company name: Fluid Routing Solutions, LLC

File number: 39-0057

EPS initials: KRSt

Permit number(s): 477696

Source point number: 04, 16

Application received date: November 7, 2019

Application complete date: February 27, 2024

Air Quality Analysis Performed? Yes ☐ No ☒

Project Description:

Fluid Routing Solutions, LLC operates a rubber automotive hose manufacturing operation. The facility consists of a fuel-burning installation of three boilers (Source 04), two extrusion lines (Source 06, insignificant), a hose curing operation with eight vulcanizers and a liquid cure unit (Source 16), and work cells with adhesive applicators (Source 26, insignificant).

The facility has removed one of the boilers from Source 04, the diesel tanks for all boilers in Source 04, and the cyclohexanone solvent from Source 06 making it insignificant. However, during the permit review process it was determined that the facility's potential to emit of a single Hazardous Air Pollutant was above the Title V threshold. A conditional major combined construction and operating permit is being issued to address the single HAP emissions, reflect the retirement of the boiler, diesel tanks, and cyclohexanone solvent, and update the permit to current standards.

Identification Information:

The facility consists of two permitted sources:

Source	Description
04	Fuel Burning Installation (Three Natural Gas-Fired Boilers)
16	Hose Curing (Vulcanizers and a Liquid Cure Unit)

The facility also includes multiple insignificant sources:

Source No.	Description	Status	Date of Letter
06	Rubber Extrusion Lines #3&4	Insignificant	1/10/2024
26	Work Cells with Adhesive Applicators	Insignificant	1/10/2024

Source 04 is expected to emit PM, SO₂, CO, VOC, and NO_x.

Source 06 is expected to emit VOC and HAP.

Source 16 is expected to emit VOC and HAP.

Source 26 is expected to emit VOC.

Source 04 is not subject to low- NO_x requirements as the boilers were constructed prior to 2005. No modifications have been made to the burners of the boilers. Therefore, the boilers are not subject to low- NO_x requirements as modified sources.

Regulatory Status: Facility is Conditional Major.

Federal Rule Applicability:

The facility is subject to 40 CFR 60, Subpart Dc due to the construction date of Boiler #3 (1997) and size (25.1 MMBtu/hr). The other two boilers were constructed prior to 1989.

Rules Analysis

Title V ☐

Conditional Major ☒

Minor ☐

Source category listed in 1200-03-09-.01(4)(b)1.(i)? Yes ☐ No ☒

Reason for PSD: New source above ____ TPY ☐ Sig. increase in ____ emissions ☐ N/A ☒

Applicable NSPS: 40 CFR 60, Subpart Dc ☐ State Rule 1200-03-16-. ☐ N/A ☒

Applicable MACT: ☐ State Rule 1200-03-31- ____ ☐ N/A ☒

Other Applicable State Rules

PM Emissions: 1200-03-06-.01(7) ☒ N/A ☐ NO_x Emissions: 1200-03-06-.03(2) ☒ N/A ☐

CO Emissions: 1200-03-06-.03(2) ☒ N/A ☐ VOC Emissions: 1200-03-06-.03(2) ☒ N/A ☐
1200-03-07-.07(2) ☒ N/A ☐

SO₂ Emissions: 1200-03-14-.01(3) ☒ N/A ☐ HAP Emissions: 1200-03-07-.07(2) ☒ N/A ☐

HAP Emissions: 1200-03-09-.02(11)(a) ☒ N/A ☐

Visible Emissions from this facility shall not exceed 20% opacity per Method 9 Rule 1200-03-05-.01(1), 1200-03-05-.03(6)

Visible Emissions from roads and parking areas shall not exceed 10 % opacity per Method 1 Rule 1200-03-08-.03

Emission Summary

Source 00

Permit Number: 477696

Source Status: New ☐ Modification ☒ Expansion ☐ Relocation ☐ **Permit Status:** New ☒ Renewal ☐

PSD ☐ NSPS ☒ NESHAPs ☐ **Previous Permit Number:** Construction Operating 464024

	Pounds/Hour			Tons/Year				Date of Data	*	Applicable TAPCR 1200-03-
	Actual	Uncontrolled Emissions	Allowable	Actual	Uncontrolled Emissions	Allowable	Net Change			
PM	0.6	0.6		2.6	2.6		N/A	12/15/2023		06-.01(7)
SO ₂	0.1	0.1		0.4	0.4		N/A	12/15/2023		14-.01(3)
CO				27.7	27.7		N/A	12/15/2023		06-.03(2)
VOC				14.2	23.1		N/A	12/15/2023		06-.03(2) 07-.07(2)
NO _x				33.0	33.0		N/A	12/15/2023		06-.03(2)
HAP (single)				9.7	13.5	9.9	N/A	12/15/2023	1,2	07-.07(2) 09-.02(11)(a)
HAP (total)				14.6	20.5	24.9	N/A	12/15/2023	1	07-.07(2) 09-.02(11)(a)

- 1) The allowable limits for HAP (single) and HAP (combined) are established by the permittee's agreement letter dated March 12, 2024. The uncontrolled emissions reflect the maximum uncontrolled emissions from the facility. The facility may not exceed the material input limit and may not emit greater than the allowable limit.
- 2) The highest single HAP is carbon disulfide.

Emission Summary

Source 04

Permit Number: 477696

Source Status: New ☐ Modification ☒ Expansion ☐ Relocation ☐ **Permit Status:** New ☒ Renewal ☐

PSD ☐ NSPS¹ ☒ NESHAPs ☐ **Previous Permit Number:** Construction _____ Operating 464024

	Pounds/Hour			Tons/Year				Date of Data	*	Applicable TAPCR 1200-03-
	Actual	Uncontrolled Emissions	Allowable	Actual	Uncontrolled Emissions	Allowable	Net Change			
PM	0.6	0.6	1.8	2.6	2.6	7.9	7.9	11/5/2019	2	06-.01(7)
SO ₂	0.1	0.1	0.3	0.4	0.4	1.3	1.3	11/5/2019	2	14-.01(3)
CO				27.7	27.7	27.7	-8.5	11/5/2019		06-.03(2)
VOC				1.8	1.8	1.8	-0.6	11/5/2019		06-.03(2)
NO _x				33.0	33.0	33.0	-10.1	11/5/2019	3	06-.03(2)

- 1) Only Boiler #3 is subject to Subpart Dc as it was constructed after June 9, 1989.
- 2) The allowable limits for PM and SO₂ are established by the permittee's agreement letter dated March 12, 2024. The permittee chose to receive a limit of three times their actual emissions.
- 3) The source is not subject to low-NO_x technology requirements as all boilers for the source were constructed prior to July 20, 2005, and no burner modifications have been made.

Emission Summary

Source 16

Permit Number: 477696

Source Status: New ☐ Modification ☒ Expansion ☐ Relocation ☐ Permit Status: New ☒ Renewal ☐

PSD ☐ NSPS ☐ NESHAPs ☐ Previous Permit Number: Construction _____ Operating 464024

	Pounds/Hour			Tons/Year				Date of Data	*	Applicable TAPCR 1200-03-
	Actual	Uncontrolled Emissions	Allowable	Actual	Uncontrolled Emissions	Allowable	Net Change			
VOC				12.4	17.3	12.4	N/A	12/15/2023	1	07-.07(2)
HAP (total)				14.6	20.4		N/A	12/15/2023	2	07-.07(2)
HAP (single)				9.7	13.5		N/A	12/15/2023	2,3	07-.07(2)

- 1) The VOC emissions include some HAP-VOC.
- 2) The allowable HAP emissions are included in the facility-wide emission limitation.
- 3) The highest single HAP is carbon disulfide.