

From: [Air.Pollution Control](#)
To: [APC Permitting](#)
Subject: FW: 82-1020/981211: Dynamic Recycling, LLC
Date: Wednesday, September 6, 2023 1:43:37 PM
Attachments: [image001.png](#)
[Scanned from a Xerox multifunction device.pdf](#)

From: Elizabeth Terranova <Elizabeth.Terranova@tn.gov>
Sent: Wednesday, September 6, 2023 12:45 PM
To: Air.Pollution Control <Air.Pollution.Control@tn.gov>
Subject: FW: 82-1020/981211: Dynamic Recycling, LLC

Good afternoon!

Can you please upload this letter onto Smoglog for the above referenced facility?
Thank you!

Sincerely,
Elizabeth Terranova

From: Brian Potter <brianp@mxinc.com>
Sent: Wednesday, September 6, 2023 1:41 PM
To: Elizabeth Terranova <Elizabeth.Terranova@tn.gov>; Rees Burt <rburt@aertn.com>
Subject: [EXTERNAL] RE: 82-1020/981211: Dynamic Recycling, LLC

Ms. Terranova please see the attached letter about terminating source 2, spray dryer.

From: Elizabeth Terranova <Elizabeth.Terranova@tn.gov>
Sent: Wednesday, September 6, 2023 10:02 AM
To: Rees Burt <rburt@aertn.com>; Brian Potter <brianp@mxinc.com>
Subject: RE: 82-1020/981211: Dynamic Recycling, LLC

Good morning!

After some internal discussions about this situation, we have concluded that the Division does not have a waiver pathway the facility can use to be able to operate Source 02. When this situation arises, the solution usually comes down to affixing additional controls, which it seems that the facility is unable to do so.

For termination of Source 02, the Division requests a formal letter signed by Mr. Potter stating the removal, since he is the responsible official of the facility.

Please let me know if you have any additional questions.

Sincerely,
Elizabeth Terranova

From: Rees Burt <rburt@aertn.com>
Sent: Monday, September 4, 2023 8:57 AM
To: Elizabeth Terranova <Elizabeth.Terranova@tn.gov>; Brian Potter <brianp@mxiinc.com>
Subject: [EXTERNAL] RE: 82-1020/981211: Dynamic Recycling, LLC

Hello Elizabeth,

After speaking with Brian and looking at our current operation. We are afraid we are unable to comply with the Tennessee PM limitation. This machinery is so infrequently used that we do not feel it is worth the investment to install a high efficiency cyclone. The one we have is older and we are unable to locate machinery specifications to demonstrate a higher rating than the 80% previously ascribed. As such, we would like to proceed with the termination of Source 02. That is unless the TDEC has any sort of waiver pathway that we could pursue for the unit. If not, please let me know what steps we need to take to remove it as a registered source with the facility and how the TDEC would like to ensure it is inoperable.

Happy Labor Day!

Best,

Rees A. Burt, REP, CHMM
Sr. Environmental Health & Safety Specialist
[LinkedIn](#)

Appalachian Environmental Resources, Inc.
www.aertn.com
206 Princeton Road, Suite 3
Johnson City, TN 37601
C: 423-900-3255
O: 423-434-2985 Ext. 109

From: Elizabeth Terranova <Elizabeth.Terranova@tn.gov>
Sent: Friday, September 1, 2023 8:51 AM
To: Rees Burt <rburt@aertn.com>; Brian Potter <brianp@mxiinc.com>
Subject: RE: 82-1020/981211: Dynamic Recycling, LLC

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning!

Attached is the 2019 application from the facility. On page 13 of the PDF document, lists the flow

rate for Source 02 and description of the cyclone and baghouse. Page 15 also mentions the cyclone and how the baghouse uses the 8000 ACFM to reduce the temperature of the air to get below 400 Fahrenheit.

With this information, can the facility's cyclone can achieve higher than 80% efficiency to reach the Division's allowable PM limitation?

Sincerely,
Elizabeth Terranova

From: Rees Burt <rburt@aertn.com>
Sent: Thursday, August 31, 2023 5:17 PM
To: Elizabeth Terranova <Elizabeth.Terranova@tn.gov>; Brian Potter <brianp@mxiinc.com>
Subject: [EXTERNAL] RE: 82-1020/981211: Dynamic Recycling, LLC

***** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. *****

Hi Elizabeth,

I met with Mr. Potter today and discussed the application.

Couple things:

1. Brian shared with me that they never had a baghouse installed on the unit. He said in an e-mail, "I don't have a baghouse. We discussed installing a baghouse here to help with visible emissions but never did so."
2. Can you send me the documentation stating the 8,000 CFM for the spray dryer gas exit velocity. For some reason I can not find that information in my records.

Thank you kindly,

Rees A. Burt, REP, CHMM
Sr. Environmental Health & Safety Specialist
[LinkedIn](#)

Appalachian Environmental Resources, Inc.
www.aertn.com
206 Princeton Road, Suite 3
Johnson City, TN 37601
C: 423-900-3255
O: 423-434-2985 Ext. 109

From: Elizabeth Terranova <Elizabeth.Terranova@tn.gov>

Sent: Monday, August 28, 2023 10:50 AM
To: Brian Potter <brianp@mxinc.com>
Cc: Rees Burt <rburt@aertn.com>
Subject: RE: 82-1020/981211: Dynamic Recycling, LLC

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Good morning!

I wanted to follow up on the stack velocities of the Spray Dryer from Source 02.

I did talk to Mr. Burt last week about the situation. During the discussion, we talked about how there should not have been changes to the source. However, in the 2019 application it mentioned a baghouse with 8000 ACFM stack velocity to reduce the temperature of the air. This baghouse is not included in the current application. I would like to ask if the facility has found any information about the baghouse and/or the missing ~4000 ACFM stack velocity between permits?

In addition to the above information, if the facility's 2023 stack velocities are accurate, can the facility's cyclone achieve higher than 80% efficiency to reach the Division's allowable PM limitation?

Please let me know if you have any questions. Thank you.

Sincerely,
Elizabeth Terranova

From: Elizabeth Terranova
Sent: Tuesday, August 22, 2023 9:38 AM
To: Brian Potter <brianp@mxinc.com>
Cc: Rees Burt <rburt@aertn.com>
Subject: 82-1020/981211: Dynamic Recycling, LLC

Dear Mr. Potter,

I am reaching out regarding to the stack velocities for Source 02 – Spray Dryer. Based on the information submitted to the Division, the facility cannot comply with the TAPCR regulatory PM emission limit for the dryer. Can the facility confirm that the exhaust rates in the 2023 application are accurate, since they changed from the 2019 application? I have attached calculations based on information on the 2023 and 2019 application. Thank you.

Please let me know if you have any question or comments regarding this situation.

Sincerely,



Elizabeth Terranova | Environmental Protection Specialist 2

Chemicals, Food, and Wood Section

Division of Air Pollution Control

Knoxville Environmental Field Office

3711 Middlebrook Pike

Knoxville, Tennessee 37921

p. 865.594.2404

Elizabeth.Terranova@tn.gov

tn.gov/environment

Hours: M-F 7:30 am – 4 pm EST

We value your opinion. Please take a few minutes to [complete our customer service survey](#).

Dynamic Recycling LLC

220 N. Industrial Dr.
Bristol, TN 37620

September 6, 2023

TDEC
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, Tennessee 37243

**RE: Termination of Source 02
Dynamic Recycling, LLC.
Facility ID: 82-1020
Bristol, Tennessee**

Ms. Terranova:

Dynamic Recycling, LLC. wished to formally remove the Spray Dryer (Source 82-1020-02) from the facility permit. Please accept this letter as our notification of the termination of this source.

Should you have any questions about the contents of this submission or require further information, please contact me at brianp@mxinc.com.

Respectfully submitted,



Brian Potter
Chief of Operations
Dynamic Recycling LLC.