TEKNOR COLOR

February 22, 2021

Kentucky Division for Air Quality
300 Sower Blvd. , 2nd Floor
Frankfort, KY 40601
Attn: Shauna Switzer / Permit Support Supervisor

Ref: Facility ID # 21-10100115
AI ID# 1836
Permit # F-16-016R1
Teknor Apex Company – TCC & TPE

Dear Ms. Switzer,

Please find enclosed the "Administrative Information" form DEP7007 AI. This letter and the DEP7007 AI form will serve as notice that there have been no changes to the existing air permit referenced above.

Please except this submission as the permit renewal for the above referenced source.

If you need any additional information, please contact me at 731-519-1304 or at sparis@teknorapex.com.

Sincerely,

Susan Paris
Senior EHS Manager

Division for Air Quality

300 Sower Boulevard

Frankfort, KY 40601

(502) 564-3999

DEP7007AI

Administrative Information

___ Section AI.1: Source Information

___ Section AI.2: Applicant Information

___ Section AI.3: Owner Information

___ Section AI.4: Type of Application

___ Section AI.5: Other Required Information

___ Section AI.6: Signature Block

___ Section AI.7: Notes, Comments, and Explanations

Additional Documentation

__ Additional Documentation attached

Source Name: Teknor Apex Compnay - TCC & TPE

KY EIS (AFS) #: 21-10100115

Permit #: F-16-016R1

Agency Interest (AI) ID: 1836

Date: 2/22/2021

Section AI.1: Source Information

Physical Location Address:	**Street:**	3058 Ohio Drive				
	City:	Henderson	**County:**	Henderson	**Zip Code:**	42420
Mailing Address:	**Street or P.O. Box:**	3058 Ohio Drive				
	City:	Henderson	**State:**	KY	**Zip Code:**	42420

Standard Coordinates for Source Physical Location

Longitude: 87.64166667 (decimal degrees) **Latitude:** 37.80444444 (decimal degrees)

Primary (NAICS) Category: Custom Compounding of purchased resins **Primary NAICS #:** 325991

Classification (SIC) Category: Custom compounding of purchased resins **Primary SIC #:** 3087

Briefly discuss the type of business conducted at this site: Custom compounding of thermoplastic polymer (TPP) pellets, color concentrate pellets and color concentrates dry blends

Description of Area Surrounding Source: __ Rural Area __ Industrial Park __ Residential Area __ Urban Area X_ Industrial Area __ Commercial Area

Is any part of the source located on federal land? __ Yes __ No

Number of Employees: 75

Approximate distance to nearest residence or commercial property: *200 yards*

Property Area: 16 acres

Is this source portable? __ Yes X_ No

What other environmental permits or registrations does this source currently hold or need to obtain in Kentucky?

NPDES/KPDES:	_X Currently Hold	__ Need	__ N/A
Solid Waste:	__ Currently Hold	__ Need	X_ N/A
RCRA:	_X_ Currently Hold	__ Need	_ N/A
UST:	__ Currently Hold	__ Need	_X N/A

Type of Regulated Waste Activity: __ Mixed Waste Generator _X Generator __ Recycler __ Other: _____

__ U.S. Importer of Hazardous Waste __ Transporter __ Treatment/Storage/Disposal Facility __ N/A

Section AI.2: Applicant Information

Applicant Name: Bill Oeth

Title: (if individual) Director of Manufacturing

Mailing Address:
Street or P.O. Box: 3058 Ohio Drive
City: Henderson State: KY Zip Code: 42420

Email: (if individual) boeth@teknorapex.com

Phone: 270-827-5571

Technical Contact

Name: Susan Paris

Title: Sr. Environmental Manager

Mailing Address:
Street or P.O. Box: 751 North Dupree Streeet
City: Brownsville State: TN Zip Code: 38012

Email: sparis@teknorapex.com

Phone: 731-519-1304

Air Permit Contact for Source

Name: Susan Paris

Title: Sr. Environmental Mananger

Mailing Address:
Street or P.O. Box: 751 North Dupree Street
City: Brownsville State: TN Zip Code: 38012

Email: sparis@teknorapex.com

Phone: 731-519-1304

Section AI.3: Owner Information

X Owner same as applicant

Name:

Title:

Mailing Address: Street or P.O. Box:

City: State: Zip Code:

Email:

Phone:

List names of owners and officers of the company who have an interest in the company of 5% or more.

Name	Position
Jonathan Fain	Owner of Teknor Apex

Section AI.4: Type of Application

Current Status: __ Title V _X_ Conditional Major __ State-Origin __ General Permit __ Registration __ None

Requested Action: *(check all that apply)*

__ Name Change	__ Initial Registration	__ Significant Revision	__ Administrative Permit Amendment
_X_ Renewal Permit	__ Revised Registration	__ Minor Revision	__ Initial Source-wide OperatingPermit
__ 502(b)(10) Change	__ Extension Request	__ Addition of New Facility	__ Portable Plant Relocation Notice
__ Revision	__ Off Permit Change	__ Landfill Alternate Compliance Submittal	__ Modification of Existing Facilities
__ Ownership Change	__ Closure		

Requested Status: __ Title V X_ Conditional Major __ State-Origin __ PSD __ NSR __ Other: _____

Is the source requesting a limitation of potential emissions? __ Yes X__ No

Pollutant:	Requested Limit:	Pollutant:	Requested Limit:
__ Particulate Matter	_____	__ Single HAP	_____
__ Volatile Organic Compounds (VOC)	_____	__ Combined HAPs	_____
__ Carbon Monoxide	_____	__ Air Toxics (40 CFR 68, Subpart F)	_____
__ Nitrogen Oxides	_____	__ Carbon Dioxide	_____
__ Sulfur Dioxide	_____	__ Greenhouse Gases (GHG)	_____
__ Lead		__ Other	_____

For New Construction:

Proposed Start Date of Construction: *(MM/YYYY)* _____ **Proposed Operation Start-Up Date:** *(MM/YYYY)* _____

For Modifications:

Proposed Start Date of Modification: *(MM/YYYY)* _____ **Proposed Operation Start-Up Date:** *(MM/YYYY)* _____

Applicant is seeking coverage under a permit shield. __ Yes _X No **Identify any non-applicable requirements for which permit shield is sought on a separate attachment to the application.**

Section AI.5 Other Required Information

Indicate the documents attached as part of this application:

__ DEP7007A Indirect Heat Exchangers and Turbines
__ DEP7007B Manufacturing or Processing Operations
__ DEP7007C Incinerators and Waste Burners
__ DEP7007F Episode Standby Plan
__ DEP7007J Volatile Liquid Storage
__ DEP7007K Surface Coating or Printing Operations
__ DEP7007L Mineral Processes
__ DEP7007M Metal Cleaning Degreasers
__ DEP7007N Source Emissions Profile
__ DEP7007P Perchloroethylene Dry Cleaning Systems
__ DEP7007R Emission Offset Credit
__ DEP7007S Service Stations
__ DEP7007T Metal Plating and Surface Treatment Operations
__ DEP7007V Applicable Requirements and Compliance Activities
__ DEP7007Y Good Engineering Practice and Stack Height Determination
__ DEP7007AA Compliance Schedule for Non-complying Emission Units
__ DEP7007BB Certified Progress Report
__ DEP7007CC Compliance Certification
__ DEP7007DD Insignificant Activities
__ DEP7007EE Internal Combustion Engines
__ DEP7007FF Secondary Aluminum Processing
__ DEP7007GG Control Equipment
__ DEP7007HH Haul Roads
__ Confidentiality Claim
__ Ownership Change Form
__ Secretary of State Certificate
__ Flowcharts or diagrams depicting process
__ Digital Line Graphs (DLG) files of buildings, roads, etc.
__ Site Map
__ Map or drawing depicting location of facility
__ Safety Data Sheet (SDS)
__ Emergency Response Plan
__ Other: _____

Section AI.6: Signature Block

I, the undersigned, hereby certify under penalty of law, that I am a responsible official*, and that I have personally examined, and am familiar with, the information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the information is on knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false or incomplete information, including the possibility of fine or imprisonment.

Mark Segee
Authorized Signature

2/22/2021
Date

Mark Segee
Type or Printed Name of Signatory

Director of EHS
Title of Signatory

*Responsible official as defined by 401 KAR 52:001.

Section AI.7: Notes, Comments, and Explanations

Section AI.5 Other Required Information

Indicate the documents attached as part of this application:

__ DEP7007A Indirect Heat Exchangers and Turbines
DEP7007B Manufacturing or Processing Operations
__ DEP7007C Incinerators and Waste Burners
__ DEP7007F Episode Standby Plan
__ DEP7007J Volatile Liquid Storage
__ DEP7007K Surface Coating or Printing Operations
__ DEP7007L Mineral Processes
__ DEP7007M Metal Cleaning Degreasers
_ DEP7007N Source Emissions Profile
__ DEP7007P Perchloroethylene Dry Cleaning Systems
__ DEP7007R Emission Offset Credit
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__ Emergency Response Plan
__ Other: _____

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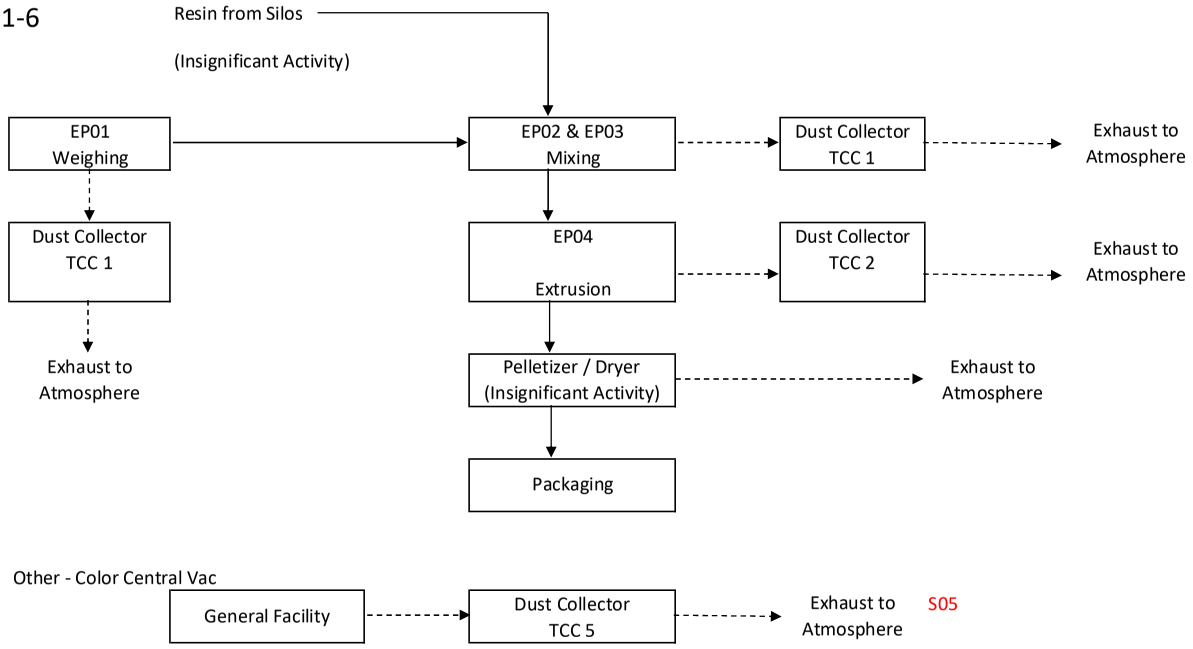
	4/13/2021
Authorized Signature	**Date**
Bill Oeth	Director of Manufacturing
Type or Printed Name of Signatory	**Title of Signatory**

*Responsible official as defined by 401 KAR 52:001.

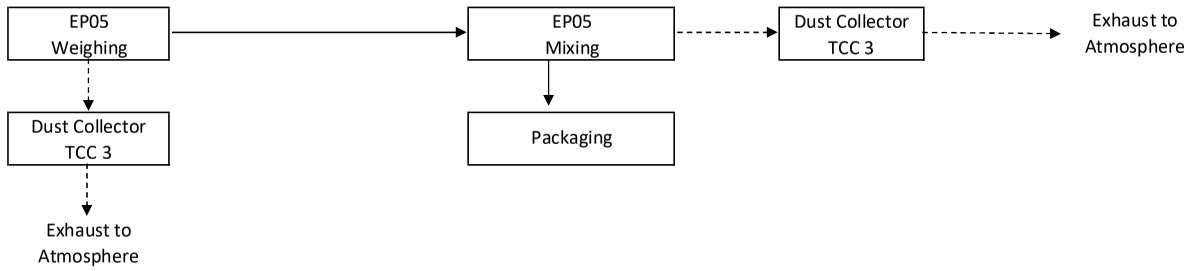
Teknor Color Company (KY TCC)

Color Lines 1-6

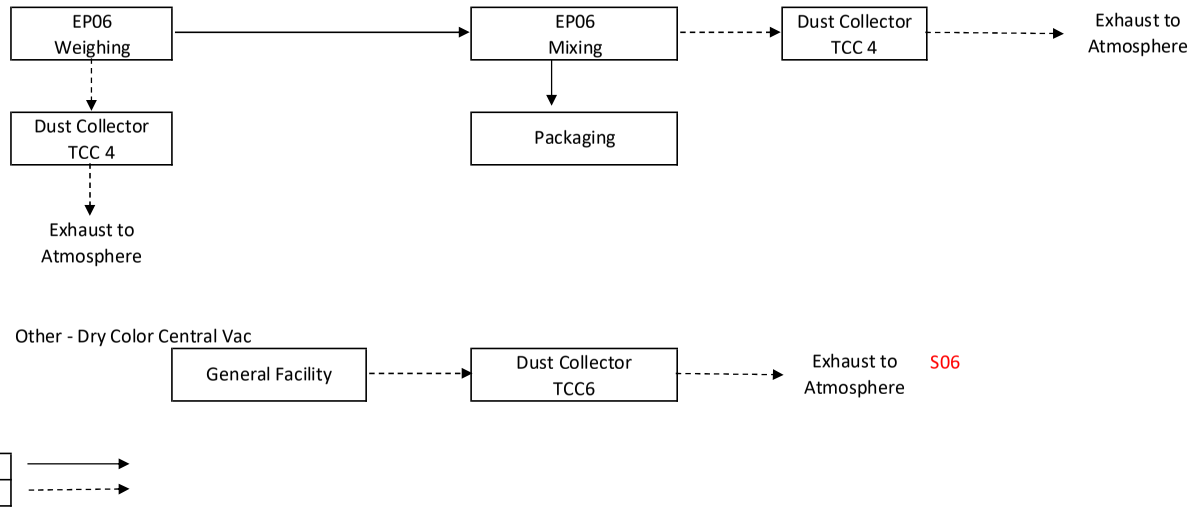
(Pellets)



Dry Color Powder

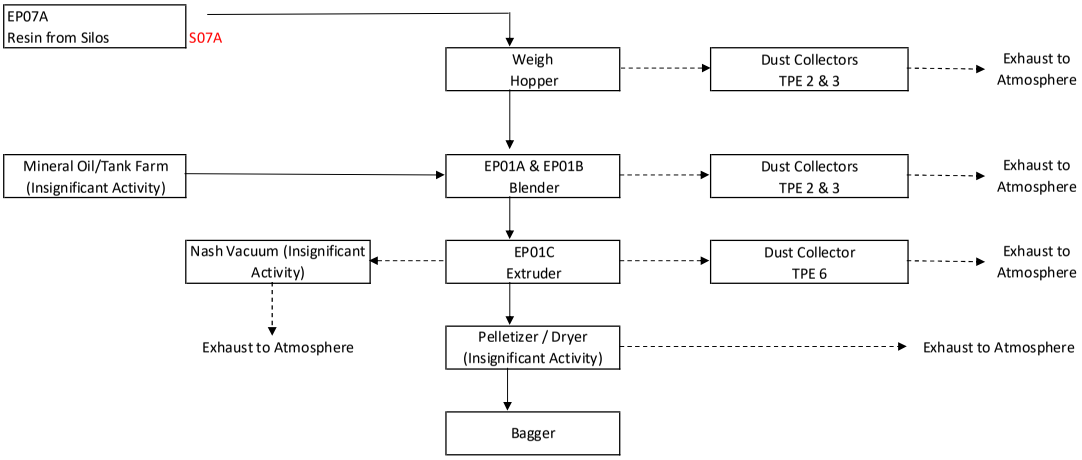


Dry Color - Metals Powder

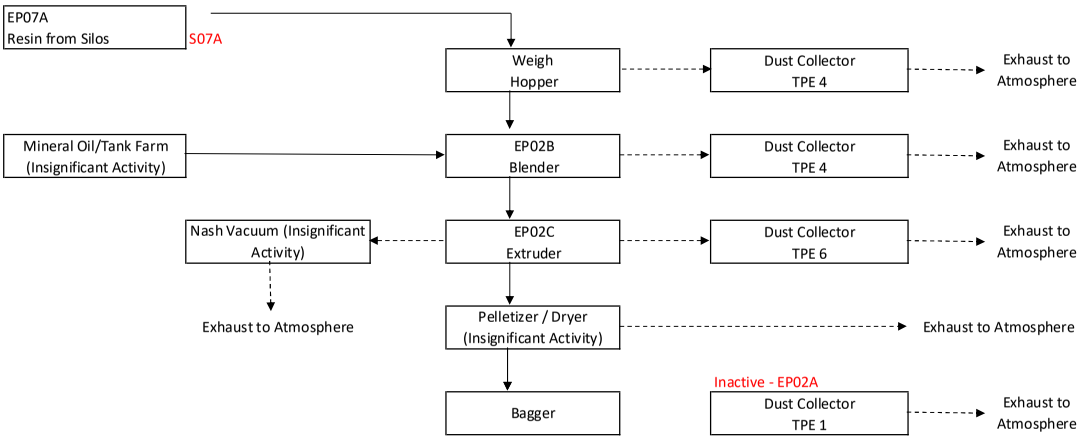


Thermoplastic Elastomers (KY TPE)

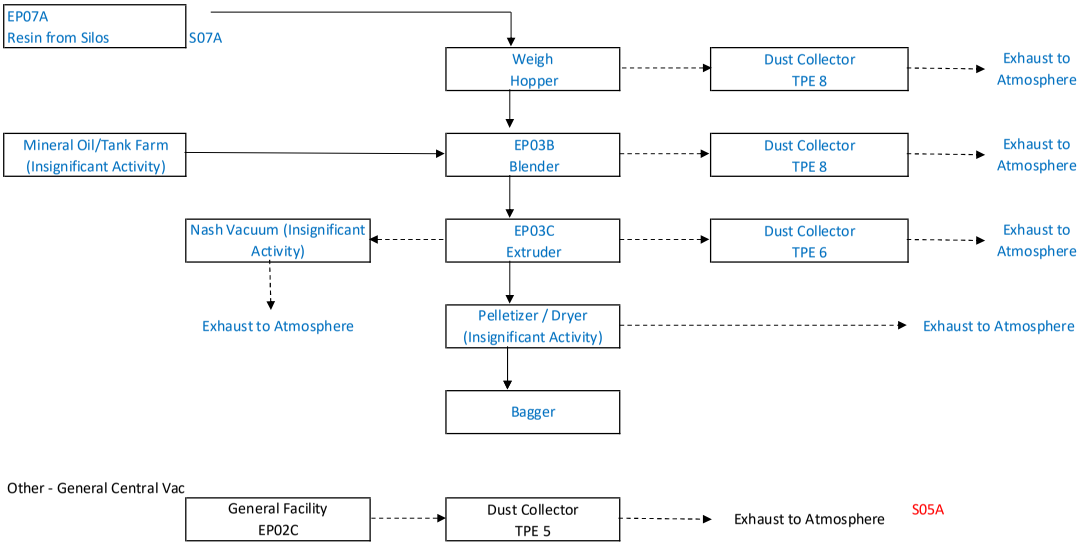
Line 1

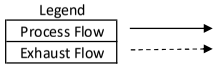


Line 2



Line 3





Zortman, Jacob (EEC)

From: Susan Paris <sparis@teknorapex.com>
Sent: Wednesday, April 21, 2021 11:29 AM
To: Zortman, Jacob (EEC)
Cc: Dodd, Kailey (EEC); Delaney, Hollie (EEC)
Subject: RE: Teknor Apex - TPE flow diagram

Follow Up Flag: Flag for follow up
Flag Status: Flagged

1. The Color Extruder TCC2 (EU04) has the potential to emit PM, and as part of the PM it has the potential to emit HAPs, although that would be a small amount. Given this I would assume the referenced regulation would be applicable, to the best of my judgment.
2. As to the HAP breakdown, I went through our raw material usage report or 2020 and made note of any HAP we used in our plants. In some cases the amounts were extremely small. I did not break these down by process because these HAPS could be used in any part of the respective plant.

   COLOR PLANT (TCC)

   Antimony compounds
   Arsenic (impurity in antimony oxide)
   Cadmium compounds
   Chromium compounds
   Cobalt compounds
   Lead compounds
   Manganese compounds (extremely small amount)
   Nickel compounds
   Selenium compounds

   TPE Plant

   Antimony compounds
   Arsenic (impurity in antimony oxide)
   Chromium compounds
   Lead compounds (impurity in antimony oxide)

3. I think “inherent baghouses” could mean bin vents, I am not sure where that term was referenced. In any case, I think that any baghouse would be considered a control device.

From: Zortman, Jacob (EEC) <jacob.zortman@ky.gov>
Sent: Monday, April 19, 2021 3:20 PM
To: Susan Paris <sparis@teknorapex.com>
Cc: Dodd, Kailey (EEC) <kailey.dodd@ky.gov>; Delaney, Hollie (EEC) <Hollie.Delaney@ky.gov>
Subject: RE: Teknor Apex - TPE flow diagram

Good afternoon Susan,

Kailey and I have drafted up some initial questions for your permit renewal process.

1. Please verify that the extruder TCC2 (EU04) is not applicable to 401 KAR 59:010, or 401 KAR 63:020. Our emissions database has particulate emissions for the potential to emit, and this isn't reflected in the applicable regulations.
2. Please provide HAP breakdown (or verify that there are no HAPs) for each process. It seems the PM may be heavy metals for some of the TCC lines, which we may need to model their emissions depending on the material compositions.
3. Please confirm what is meant by "Inherent Baghouses". Our emissions database has a note on this, and we would like a bit more confirmation on what is meant by this. Not sure if we can consider the baghouses as "process" instead (see definition of control device in 401 KAR 52:001).

I think we will probably have a few more questions soon, but for now I wanted to give you some feedback while we continue our review. Let me know if you have any questions regarding our review, and feel free to call me at (785) 341-1624.

Thanks,

Jacob Zortman
Environmental Engineer Assistant I
KY Department for Environmental Protection
Division for Air Quality
Permit Review Branch
Chemical Section
300 Sower Blvd., 2nd Floor
Frankfort, KY 40601
O: 502-782-0524
C: 785-341-1624

From: Susan Paris <sparis@teknorapex.com>
Sent: Tuesday, April 13, 2021 3:22 PM
To: Zortman, Jacob (EEC) <jacob.zortman@ky.gov>
Subject: Teknor Apex - TPE flow diagram

Susan Paris
Sr. Environmental Manager
Teknor Apex Tennessee Company

TEKNOR COLOR

February 1, 2017

Kentucky Division for Air Quality
Permit Support Section
200 Fair Oaks Lane, 1st Floor
Frankfort, KY 40601

Attn: Julian Breckinridge

Subject: Teknor Apex Company – TCC & TPE
Permit ID F-16-016 R1
Base emission source factors on grain loading

Dear Julian:

Teknor Apex Company is submitting written request that source emission factors for the subject facilities be based on outlet grain loading and removal efficiency rating in lieu of conducting stack testing. Per our conversation in late November, US Air Filtration, the manufacturer of dust collection equipment used at these Teknor locations, has supplied documents describing standard performance of cartridge and filter bag media at normal operating conditions . A copy of the documentation supplied with our most recent filter media shipment is attached for your reference.

Particle efficiency for filter bags is based on the volume of total emissions allowed through the baghouse, measured in grains per dry standard cubic feet (gr/dscf); efficiency for filter bags provided to Teknor Apex is 0.005 gr/dscf. The particle efficiency for filter cartridges is 99.7% to 99.99% for particles at 5 microns. Teknor Apex utilized much more conservative performance values of 0.01 grains/scf and 97.8% control efficiency in supporting calculations provided with our air permit application. When using values provided in the US Air Filtration guarantee, emission estimates decrease approximately 50%,, resulting in much lower potential environmental impact.

This request is also being made for financial consideration. The cost estimate to perform stack testing ranges from $50,000 to $75,000. A significant contribution to this estimate is the need to add a temporary stack to our baghouses in order to meet EPA Method 5 sampling point location selection criteria. As you may know, the Teknor Apex color business is our smallest business and this cost would have a significant financial impact.

Teknor Apex believes this option may be supported by language included in Section B.3 – Testing Requirements of our Air Permit (F-160016R1). Paragraph 3.a. reads as follows:

> "In accordance with 401 KAR 52:030, Section 26, the permittee must conduct a representative performance test for each control equipment of similar design that does not base emission factor source on outlet grain loading within 180 days of the issuance of permit F-16-016 to demonstrate compliance with the allowable emission limitations pursuant to 401 KAR 59:010 using EPA Reference Method 5 and to determine the control efficiency of each control device.

The reference to "base emission factor source on outlet grain loading" appears to indicate that we may have an option to show compliance by making use of vendor guaranteed grain loading as opposed to conducting Method 5 stack testing. If this is the case, Teknor would like to suggest an alternative to rely on the vendor-provided performance guarantee. If this option is acceptable, Teknor personnel would routinely measure and record pressure drop across the system, when operating any equipment connected to the baghouse.

I respectfully request your consideration of this request and would be happy to discuss this option further with you. Please call me directly at (864) 408-6445 if you have any questions or would like to discuss in more detail.

Sincerely,

Mark Segee
Sr. EHS Manager

cc: Terry Connell, Sr. EHS Specialist, Teknor Apex Company

U.S.
Air Filtration, Inc.

Clearing the Air for a Cleaner Environment Since 1987

Filter Efficiency (Dust/Grain Loading)

Definition: Efficiency is a measure of how much dust is collected by a certain filter media. The measurement and descriptions used are very differently between cartridges and filter bags.

Cartridge Media Efficiency Ratings: Cartridge media states efficiencies as a percentage of certain sizes particles trapped by the filter media. The following is an example of the efficiency rating for our standard spun bond poly media.

Particle Efficiency by Weight:	
0.5 micron	99.70%
1.0 micron	99.80%
2.0 micron	100%

Filter Bags: Filter bags use a different measurement for efficiencies than cartridges. This is primarily because bags rely much more on the filter cake to catch the smaller particles. Bag media efficiencies are based on the volume of total emissions allowed through the baghouse and not micron size. It is measured in grains per dry standard cubic foot (gr/dscf).

1. Standard felts = 0.005 grains per dry standard cubic feet.
    a. 7000 grains per pound
    b. DSCF is equivalent to the CFM of the system.
    c. Example: Maximum emissions = .005 / 7000 * 20,000 cfm x 60min = .85 lbs / hr of dust on a 20,000 CFM system

www.usairfiltration.com
• 42065 Zevo Drive, Suite 12 • Temecula, CA 92590 • 951.491.7282 • Toll Free: 888.221.0312
• Fax: 951.491.7281
CA State Contractors License #531478

U.S. Air Filtration, Inc.

Clearing the Air for a Cleaner Environment Since 1987

TECHNICAL DATA SHEET

FILTER CARTRIDGE SPECIFICATIONS
ITEM NUMBER: USAF-C00002*

Dimensions:	**Height:**	**26"**
	Outside Diameter:	**13.84"**
	Inside Diameter:	**9.479"**
Top End Cap:	**Material:**	**Electro Galvanized (22 ga)**
	Style:	**Open**
Bottom End cap:	**Material:**	**Electro Galvanized (22 ga)**
	Style:	**Open**
Gasket:	**1/2" x 1/2" x 11.75" ID isoprene applied on Top cap**	
Inner Retainer:	**Electro galvanized expanded metal 3/8" x 5/8" (9.53 mm x 15.88 mm) 72% open area**	
Outer Retainer:	**Electro galvanized expanded metal 3/8" x 5/8" (9.53 mm x 15.88 mm) 72% open area**	
Filter Media Area:	**254 ft²**	
Pleat Count:	**368 +/- 2**	
Media Type:	***ProTura*** **Nanofiber Technology**	
Permeability:	**20 cfm/ft² @ 0.5" w.g.** **160 L/sec/m² @ ΔP 20 mm w.g.**	
Maximum Temperature:	**180° F (82.22° C)**	
Minimum Efficiency Reporting Value:	**Merv 15 @ 900 cfm**	
Particle Efficiency:	**99.99% @ 0.5 micron**	

www.usairfiltration.com
• 42065 Zevo Drive, Suite 12 • Temecula, CA 92590 • 951.491.7282 • Toll Free: 888.221.0312 • Fax: 951.491.7281
CA State Contractors License #531478

Zortman, Jacob (EEC)

From: Susan Paris <sparis@teknorapex.com>
Sent: Friday, April 23, 2021 9:21 AM
To: Zortman, Jacob (EEC)
Subject: Teknor Apex

Here is the HAP breakdown for TPE

Total 2020 production	20,540,000 lbs	
Total 2020 antimony usage	121,446 lbs	0.6% of total production
Total 2020 arsenic usage	122 lbs	0.0006% of total production
Total chromium usage	375 lbs	0.002% of total production
Total lead usage	122 bs	0.0006% of total production

Susan Paris
Sr. Environmental Manager
Teknor Apex Tennessee Company

Harley, Brian (EEC)

From: Susan Paris <sparis@teknorapex.com>
Sent: Monday, December 16, 2024 5:27 PM
To: Harley, Brian (EEC)
Cc: Patil, Durga D (EEC)
Subject: RE: Teknor Apex Company - TCC & TPE Renewal

So I did more work on the cooling tower, the tower is 315 tons, vs 250 tons as stated in the permit. The "250 gallons" was supposed to be "tons".

So I also I think I miss applied the formulae. I went back and calculated the drift first and then applied the emission factor, when I do that I get a more reasonable 1.9 lbs/year. So I think that is the final answer.

From: Susan Paris
Sent: Monday, December 16, 2024 2:39 PM
To: Harley, Brian (EEC) <Brian.Harley@ky.gov>
Cc: Patil, Durga D (EEC) <Durga.Patil@ky.gov>
Subject: RE: Teknor Apex Company - TCC & TPE Renewal

The highlighted items are the ones associated with the color plant which was shutdown. As to the colling tower, when I talked to maintenance on Friday they told me the flow rate on the tower was 945 gpm as opposed to 250 gpm, as listed in the permit. I am going to verify that but if I assume 945 gpm and the AP 42 emission factor of 0.019 lbs/ 1000 gallons, then I calculate 4.7 tons per year PM, assuming 8760 hrs per year.

From: Harley, Brian (EEC) <Brian.Harley@ky.gov>
Sent: Monday, December 16, 2024 2:11 PM
To: Susan Paris <sparis@teknorapex.com>
Cc: Patil, Durga D (EEC) <Durga.Patil@ky.gov>
Subject: RE: Teknor Apex Company - TCC & TPE Renewal

Good Afternoon,

I have attached a pre-draft of your permit with the emissions units associated with the TCC equipment highlighted in yellow. Please confirm that these units are no longer in operation at the plant and that they need to be removed from the permit.

Furthermore, 401 KAR 59:010 is in fact a Generally Applicable Regulation, so the Cooling tower and other insignificant activities for which 401 KAR 59:010 would be applicable can remain in Section C of the permit. However, we do need the emissions for the 250 gpm Cooling Tower associated with the Performance Elastomers.

Please review the permit and confirm that the highlighted emission units should be removed from the permit by noon on Friday, December 20, 2024.

Thank You,
Brian Harley

From: Harley, Brian (EEC)
Sent: Friday, December 13, 2024 11:23 AM
To: Susan Paris <sparis@teknorapex.com>
Cc: Patil, Durga D (EEC) <Durga.Patil@ky.gov>
Subject: RE: Teknor Apex Company - TCC & TPE Renewal

Good Morning,

Thank you for getting back to me about the items that I had asked about.

In order to facilitate the removal of the TCC equipment in the permit, please let us know when the equipment was removed and specifically what emission units in Section B and Section C of the permit are no longer in operation/removed from the facility.

Thank You,
Brian Harley

From: Susan Paris <sparis@teknorapex.com>
Sent: Friday, December 13, 2024 10:50 AM
To: Harley, Brian (EEC) <Brian.Harley@ky.gov>
Cc: Patil, Durga D (EEC) <Durga.Patil@ky.gov>
Subject: RE: Teknor Apex Company - TCC & TPE Renewal

- Dispersions Modeling was performed on the emission units at the facility subject to 401 KAR 63:020 for Chromium (VI) (Hexavalent Chromium) and Cadmium. The predicted maximum residential impact was compared against the May 2024 RSL table for residential air where they were found to be in exceedance.
  - To show compliance with 401 KAR 63:020, it is suggested that actual emissions from Chromium (IV) be limited to $2.43E^{-5}$ tpy and Cadmium be limited to $3.24E^{-3}$ tpy.

  The chromium and cadmium emitting equipment has been removed as the color (TCC plant) was shut down. What procedure do I need to follow to remove the TCC equipment from the permit?

  The list of insignificant activities for the permit lists two cooling towers, one at 200 gpm and the other at 250 gpm. The current practice of the Division is to view cooling towers as process operations subject to 401 KAR 59:010 for emissions of Particulate Matter. As such 401 KAR 59:010 is not a Generally Applicable Regulation and the cooling towers must be put into Section B of the permit.
  - Furthermore, the emissions must be quantified and put into the Emissions Inventory System.
  - Please provide emissions calculations for the cooling towers.
    - The emissions for Cooling Towers can be found using AP-42 Ch13.4.

  I will calculate these emissions for you next week and get you those numbers

- Also listed as an insignificant activity is the Electric Fluidized Bed Parts Cleaner.
  - Please indicate if any volatile organic solvents are used in this cleaner.

  This equipment was also located at the plant site (TCC) that has been shut down.