



NAGASE Group
Bringing it all together

SOFIX LLC

2800 RIVERPORT ROAD, CHATTANOOGA, TN 37406
PHONE (423) 624 - 3500

Safety is the foundation for building a quality product

A handwritten signature in blue ink, located in the top right corner of the page.

March 10, 2022

Mr. Alan Frazier P.E.
Chattanooga- Hamilton County
Air Pollution Control Bureau
6125 Preservation Drive
Chattanooga, TN 37416-3638

Dear Mr. Frazier

Attached is our Part 70 Permit Application renewal for Sofix LLC.

If you have any questions or comments, I can be reached at 423.624.3500 ext. 106.

Sincerely,

A handwritten signature in blue ink, located below the word 'Sincerely,'.

Sean Reynolds
EHS Manager
Sofix LLC

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MAR 14 2022

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Sofix Permit renewal 2022.docx
Attachments

PART 70 PERMIT APPLICATION UPDATE



1. Sofix LLC hereby resubmits all of the information in our current Part 70 operating permit application that is presently on file at the Chattanooga-Hamilton County Air Pollution Control Bureau except as changed by the attached Part 70 permit application forms, along with all previously submitted applications for permit modifications currently on file at the Chattanooga-Hamilton County Air Pollution Control Bureau, as its renewal application.

2. The permittee name on file with the Tennessee Secretary of State Business Services Division is Sofix LLC.

3. Responsible Official (check one)

The responsible official or officials are:

as shown on the present Part 70 permit.

changed for the renewal. Provide the name and title of each responsible official

Name Title

Name Title

4. Compliance Assurance Monitoring Rule (check one)

The Compliance Assurance Monitoring Rule (40CFR Part 64) does not apply to this facility.

The Compliance Assurance Monitoring Rule (40CFR Part 64) will apply to this facility upon renewal. If so, attach new compliance demonstration Part 70 permit application forms documenting the requirements of 40CFR Part 64.4. A new Form 70-19 is required. If monitoring compliance using control system parameters Form 70-22 is required. Depending on the monitoring strategy proposed, Form 70-20, 70-21, 70-23, 70-25, and/or 70-27 may also be required.

5. The following additional applicable requirements should be added to our renewal Part 70 permit. Attach Form 70-30 showing all current applicable requirements if there are any changes in the applicable requirements.

a. N/A

b.

c.

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6. The following applicable requirements no longer apply and should be deleted from our renewal Part 70 permit:
- a. N/A
 - b.
 - c.
7. The facility emissions summary is as shown below (If the emissions summary from the facility has changed, complete Form 70-29)

Pollutant	Allowable Emissions (TPY)	Potential Emissions (TPY)
VOC	28.998	
NOx	5.606	
SO2	0.031	
PARTICULATE	1.282	
CO	4.528	

8. Insignificant activities listed in our initial Part 70 operating permit application pursuant to Section 4-56 (c)(12) have changed as listed below. If there are any changes to the insignificant activities attach a completed Form 70-02 listing the current insignificant activities.

Insignificant Activity	Add	Delete

9. The following operational flexibility notification(s) previously sent to the Chattanooga-Hamilton County Air Pollution Control Bureau and to Region 4 EPA should be incorporated into the Part 70 permit. Attach the Part 70 permit application forms documenting any equipment replaced, or added, using operational flexibility provisions. (Forms 70-03 through 70-18 as appropriate.)

Description	Date Submitted

10. Attach a completed Form 70-01 with "Permit renewal to operate" checked and a completed Form 70-31.

I certify that this permittee has been in compliance with all applicable requirements contained in our existing Part 70 permit, will continue to comply with all applicable requirements, and will be in compliance with future applicable requirements to be added to the renewal Part 70 permit by the specified compliance date.

Based on information and belief formed after reasonable inquiry, the statements and information in this renewal application are true, accurate, and complete.

3/10/22
Date

[Signature]
Responsible Official (signature)

Title: VP OPERATIONS
Company: SOFIX LLC
Address: 2800 RIVERPORT ROAD
CHATTANOOGA, TN 37406

State of Tennessee, County of HAMILTON

Sworn to and subscribed before me this 10 day of MARCH, 2022.

[Signature]
Notary Public

My commission expires: December 10, 2023



Major Source Operating Permit Application
Facility Identification

Form 70-01

1	Facility Name	Sofix LLC		For APCB use only	Company No.
	Owner's Name if different from the facility name:	SAME			
	Mailing Address:	2800 RIVERPORT ROAD			
	City, State, Zip Code	CHATTANOOGA, TN 37406			
2	Facility Location (St/Rd/Hwy)	2800 RIVERPORT ROAD			
	County Name	Hamilton			
	City, State, Zip Code	CHATTANOOGA, TN 37406			
	Telephone # (including area code)	423-624-3500			
3	Facility's Primary Activity and all Applicable SIC Codes:	2865: CYCLIC ORGANIC CRUDES AND INTERMEDIATES AND ORGANIC DYES AND PIGMENTS.			
4	Contact Person for this Facility	SEAN REYNOLDS			
	Title	EHS MANAGER			
	Telephone # (including area code)	423.624.3500 EXT. 106			
5	If Facility is located in an area designated as "Nonattainment", indicate the pollutant(s) for the designation.	Not Applicable			
6	List all air pollution permits issued to the sources contained in this application [identify all permits with most recent permit numbers and emission source reference numbers listed on the permit(s)]	PART 70 PERMIT NUMBER 47-065-5345			
7	Permit Requested for:	<input type="checkbox"/> Initial Application to Operate <input type="checkbox"/> Relocation to operate		<input type="checkbox"/> Modification <input checked="" type="checkbox"/> Permit renewal to operate	
		<input type="checkbox"/> Revision (Administrative Amendments)			
8	Owner's registered agent's name	N/A			
	Registered agent's address for service of process				
	Telephone # (including area code)				
9	Is this facility subject to the provisions governing prevention of accidental releases of Hazardous air contaminants contained in Section 112(r)(7) of the Clean Air Act?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
	If yes, are you in compliance with the provisions of Section 112(r)(7) of the Clean Air Act?	<input type="checkbox"/> Yes <input type="checkbox"/> No			
10	Page Number	Revision Number	Date of Revision		

Chattanooga-Hamilton County Air Pollution Control Bureau
 6125 Preservation Drive
 Chattanooga, TN 37416

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**Major Source Operating Permit Application
Compliance Plan and Compliance Certification**

Form 70-31

1	Facility name	SOFIX LLC	
2	List all the process emission source(s) or pieces of fuel burning equipment or incinerator(s) that are part of this application. Attach additional pages if necessary.	EMMISSION UNITS 001, 002,003,004,005;Subpart FFFF Miscellaneous Organic Chemical NESHAP (MON) MCPU, Heat exchange systems, Wastewater	
3	Indicate those source(s) contained in this application which are presently in compliance with all applicable requirements by checking the following as they apply.	<input checked="" type="checkbox"/> Attached is a statement of the identification of the source(s) currently in compliance. We will continue to operate and maintain the source(s) to assure compliance with all applicable requirements for the duration of the permit. <input type="checkbox"/> Form(s) 70-30 includes new requirements that apply or will apply to the source(s) during the term of the permit. We will currently meet such requirements on a timely basis.	
4	INDICATE THOSE SOURCE(S) CONTAINED IN THIS APPLICATION WHICH ARE NOT PRESENTLY IN FULL COMPLIANCE BY CHECKING BOTH OF THE FOLLOWING: <input type="checkbox"/> A. Attached is a statement of identification of the source(s) not in compliance, non-complying requirement(s), brief description of the problem, and the proposed solution. <input type="checkbox"/> B. Compliance will be achieved according the following schedule:		
		Action	Deadline
Progress reports will be submitted: Start date: _____, and at least every 180 days thereafter until compliance is achieved.			
5	Indicate the compliance status with any applicable enhanced monitoring and compliance certification requirements that have been promulgated under section 114(a)(3) of the Clean Air Act as of the date of submittal of this form 70-31.		
6	Page number	Revision number	Date of revision

Chattanooga-Hamilton County Air Pollution Control Bureau
6125 Preservation Drive
Chattanooga, TN 37416

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SOFIX LLC

2800 RIVERPORT ROAD, CHATTANOOGA, TN 37406
PHONE (423) 624 - 3500

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January 9, 2023

Mr. Alan Frazier P.E.
Chattanooga- Hamilton County
Air Pollution Control Bureau
6125 Preservation Drive
Chattanooga, TN 37416-3638

Dear Mr. Frazier

Attached is an application to add a diesel-powered fire protection boost pump to our existing permit. The installation time frame is estimated to be late 2nd quarter or early 3rd quarter 2023 based on the 30-week lead time from order placement to delivery.

The unit will be located within the Sofix facility site perimeter and housed in a building that will be constructed around it once the unit is installed. The final site location is still in the planning phase of this project.

If you have any questions or comments, I can be reached at 423.624.3500 ext. 106.

Sincerely,

Sean Reynolds
EHS Manager
Sofix LLC

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JAN 11 2023

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Sofix Permit application for boost pump 2023
Attachments

→ Below 5 MM Btu/hr threshold requirement for an installation permit

Facility Identification

JS

1	Facility Name	Sofix LLC		For APCB use only	Company No.
	Owner's Name if different from the facility name:	SAME			
	Mailing Address:	2800 RIVERPORT ROAD			
	City, State, Zip Code	CHATTANOOGA, TN 37406			
2	Facility Location (St/Rd/Hwy)	2800 RIVERPORT ROAD			
	County Name	Hamilton			
	City, State, Zip Code	CHATTANOOGA, TN 37406			
	Telephone # (including area code)	423-624-3500			
3	Facility's Primary Activity and all Applicable SIC Codes:	2865: CYCLIC ORGANIC CRUDES AND INTERMEDIATES AND ORGANIC DYES AND PIGMENTS.			
4	Contact Person for this Facility	SEAN REYNOLDS			
	Title	EHS MANAGER			
	Telephone # (including area code)	423.624.3500 EXT. 106			
5	If Facility is located in an area designated as "Nonattainment", indicate the pollutant(s) for the designation.	Not Applicable		RECEIVED CHATT / HAMILTON CO. JAN 11 2023	
6	List all air pollution permits issued to the sources contained in this application [identify all permits with most recent permit numbers and emission source reference numbers listed on the permit(s)]	AIR POLLUTION CONTROL BUREAU PART 70 PERMIT NUMBER 47-065-5345			
7	Permit Requested for:	<input type="checkbox"/> Initial Application to Operate <input checked="" type="checkbox"/> Modification <input type="checkbox"/> Revision (Administrative Amendments)		<input type="checkbox"/> Relocation to operate <input type="checkbox"/> Permit renewal to operate	
8	Owner's registered agent's name	N/A			
	Registered agent's address for service of process				
	Telephone # (including area code)				
9	Is this facility subject to the provisions governing prevention of accidental releases of Hazardous air contaminants contained in Section 112(r)(7) of the Clean Air Act?			<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	If yes, are you in compliance with the provisions of Section 112(r)(7) of the Clean Air Act?			<input type="checkbox"/> Yes	<input type="checkbox"/> No
10	Page Number	Revision Number	Date of Revision		

**Major Source Operating Permit Application
Fuel Burning Equipment**

Form 70-04

JLA

1	Facility Name	Sofix LLC								
2	Type of fuel burning equipment: <i>(A form 70-04 must be completed for each piece of fuel burning equipment.)</i>	Diesel powered boost pump for fire suppression system								
3	Fuel burning equipment identification #	FS-01								
4	Stack ID (or flow diagram point identification)	FSS-01								
5	Fuel burning equipment description:	Diesel engine for boost pump – fire suppression system								
6	Year of installation or last modification of fuel burning equipment:	2023								
7	Furnace type:	N/A								
8	Manufacturer:	Clarke Engines								
	Model Number	Clarke Engine JU6H-UFADNG; 190 HP, @ 3000 RPM								
	Year of Manufacture:	2022								
9	a. Type(s) of Fuel	b. Rated Capacity in Million BTU/HR input	c. Type of Firing	Fuel Consumption			f. Percent Content		g. Heating Content of Fuel	(%) Excess Air
				d. Average	d. Maximum	e. Annual	Sulfur	Ash		
	Primary: Normal operating fuel(s)	Diesel Fuel								
	Standby #1: Fuel(s) used in emergency only									
Standby #2: Fuel(s) used in emergency only										
10	If emissions from this fuel burning equipment are controlled for compliance, specify the type of control:	N/A								
11	If emissions from this fuel burning equipment are monitored for compliance, specify the type of monitoring:	N/A								
12	Location of this fuel burning equipment in UTM coordinates:	North			East					
		To be determined			TBD					
13	Normal operating schedule	Manufacturer recommended operation				Hours/Day	0.25			
						Days/Week	1			
						Days/Year	52.50			
14	Describe any fugitive emissions associated with this process, such as outdoor storage piles, open conveyors, material handling operations, etc. (Attach a separate sheet if necessary.)	None								
15	Page Number	Revision Number						Date of Revision		

EPA Tier 1-3 nonroad diesel engine emission standards, g/kWh (g/bhp-hr)

JLA

Note: (g per hr / 454 g per pound)

(12.5 hr/yr)

	horsepower	g/kWh-hr	g/bhp-hr	g/hr	#/Hr	Annual PTE non emergency use	Annual PTE based on 100 exempt hours
CO	190	<i>3.5</i>	<i>3.7 ~ 2.6</i>	703	1.5485	19.3557	154.8458
HC	190		0	0	0.0000	0.0000	0.0000
NMHC+Nox	190	4.0	<i>0 ~ 3.0</i>	0	0.0000	0.0000	0.0000
NoX	190	6.9		1311	2.8877	36.0958	288.7665
PM	190	0.20	<i>0.22 ~ 0.15</i>	41.8	0.0921	1.1509	9.2070
			Total emissions		4.5282	56.6024	452.8194

NFPA recommended run time = 15 minutes per week x 52 weeks = 12.5 hours per year
 Exempt non emergency use = 100 hours per year

Clarke Engine
 JU6H-UFADNG; 190 HP, 3000 RPM

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Use AP-42 Table 3.3-1 for VOC
Use AP-42 Table 1.3-1 for SOx (0.0015 % S)

AP-42 Table 3.3-1 uses 7,000 Btu/hp-hr

190 hp · 7,000 $\frac{Btu}{hp-hr}$ · $\frac{1 MMBtu}{1,000,000 Btu}$ = 1.33 MMBtu/hr

1.33 $\frac{MMBtu}{hr}$, $\frac{1 gal diesel fuel}{0.137 MMBtu}$ = 9,708 gal diesel fuel/hr

9,708 $\frac{gal diesel fuel}{hr}$, $0.144 \cdot 0.0015 \frac{lb SOx}{gal diesel fuel}$ = 0.0021 lb SOx/hr



SOFIX LLC

2800 RIVERPORT ROAD, CHATTANOOGA, TN 37406
PHONE (423) 624 - 3500

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RD
10-19-23

October 17, 2023

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Mr. Ronald Drumeller, Director
Chattanooga- Hamilton County
Air Pollution Control Bureau
6125 Preservation Drive
Chattanooga, TN 37416-3638

OCT 19 2023

AIR POLLUTION
CONTROL BUREAU

Re: Part 70 Permit # 47-065-5345
Certificate 6192-30112199-01C and
Certificate 6192-30112199-02C
Sofix LLC, Chattanooga, TN

Dear Mr. Drumeller:

This letter is to notify CHCAPCB of changes to our operational status. Color former production will halt the week of October 30, 2023 due to the decision to sell the facility. Our intent is to remove all process chemicals by the end of December 2023. Air pollution controls and record keeping will continue as required by Permit 47-065-5345 until all toluene is removed from the site.

Sofix personnel will be on-site through March 31, 2024. Our intent is to keep the above referenced permits open in the event a potential buyer decides to continue color former production, at which time the facility would be brought back into operation. Sofix will provide periodic updates as status or conditions change.

Additionally, Sofix is proceeding with the fire pump installation for which a permit application was submitted earlier this year.

If you have any questions or comments, I can be reached at 423.624.3500 ext. 106.

Sincerely,

Sean Reynolds
EHS Manager

Cc: Alan Fraizer
Paul Cahill