



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Air Pollution Control
Davy Crockett Tower
500 James Robertson Pkwy, 7th Floor
Nashville, TN 37243-1204

Nokian Tyres U.S. Operations LLC
c/o National Registered Agents, Inc.
300 Montvue Road
Knoxville, Tennessee 37919-5546

Certified Article Number

9414 7266 9904 2240 2607 06

SENDER'S RECORD

RE: Nokian Tyres U.S. Operations LLC
Facility Id. 72-0163
Case No. APC25-0151

Dear Sir/Madam:

Enclosed please find an Order and Assessment of Civil Penalty issued by Michelle Walker Owenby, Technical Secretary of the Air Pollution Control Board, Department of Environment and Conservation. Please read it carefully and pay special attention to the Notice of Rights section.

If you have any questions regarding this Order and Assessment of Civil Penalty, please contact Kevin McLain at air.pollution.control@tn.gov. For all other questions, please contact the Division of Air Pollution Control at (615) 532-0554 or air.pollution.control@tn.gov.

Sincerely,

Kevin McLain

Kevin McLain (Nov 17, 2025 14:22:37 CST)

Kevin McLain
Section Manager, Enforcement
Division of Air Pollution Control

oou

Enclosure

**STATE OF TENNESSEE
AIR POLLUTION CONTROL BOARD**

IN THE MATTER OF:)	DIVISION OF AIR POLLUTION
)	CONTROL
)	
NOKIAN TYRES U.S. OPERATIONS)	
LLC,)	
)	
RESPONDENT.)	CASE NO. APC25-0151

**TECHNICAL SECRETARY'S ORDER AND
ASSESSMENT OF CIVIL PENALTY**

Michelle Walker Owenby, Technical Secretary of the Air Pollution Control Board, states:

PARTIES

I.

Michelle Walker Owenby is the Technical Secretary of the Air Pollution Control Board ("Board") and Director of the Division of Air Pollution Control ("Division"), Department of Environment and Conservation ("Department").

II.

Nokian Tyres U.S. Operations LLC ("Respondent") is a domestic limited liability company authorized to do business in Tennessee. The Respondent's facility address is 520 Nokian Tyres Drive, Dayton, Tennessee 37321. The Respondent's registered agent for service of process is National Registered Agents, Inc., 300 Montvue Rd, Knoxville, Tennessee 37919-5546.

AUTHORITY

III.

The Technical Secretary may assess a civil penalty of up to \$25,000 per day for each day of violation of the Tennessee Air Quality Act, Tenn. Code Ann. §§ 68-201-101 to -121 ("Act"), or Tennessee Air Pollution Control Regulations, Tenn. Comp. R. & Regs. 1200-03-01 to -36; 0400-30-01 to -39, ("Rules"). Tenn. Code Ann. § 68-201-116. The Technical Secretary may issue

an order for correction to the responsible person when provisions of the Act or Rules are violated, and such person may be liable for resulting damages to the State. *Id.*

IV.

The Respondent is a “person,” Tenn. Code Ann. § 68-201-102(7), and has violated the Act and Rules.

V.

“Air contaminant” means particulate matter, dust, fumes, gas, mist, smoke, vapor, or any combinations thereof. Tenn. Code Ann. § 68-201-102(1).

VI.

“Air contaminant source” means any and all sources of emission of air contaminants, whether privately or publicly owned or operated. Tenn. Code Ann. § 68-201-102(2). The Respondent operates an air contaminant source.

FACTS

VII.

On January 10, 2023, the Technical Secretary issued True Minor operating permit number 080473 (“Permit 080473”), (facility 72-0163), to the Respondent for a rubber tire manufacturing operation that consists of the following air contaminant sources:

Source Number(s)	Source Description
01 and 12 through 42	Railcar and Trailer Unloading, Storage and Handling
02, 43, and 44	Manufacturing and Material Usage
03	Rubber Mixing
04	Tire Curing
05	Two Natural Gas Boilers

VIII.

Condition S1-4 of Permit 080473 states, in pertinent part:

Emission Limitation(s)

Particulate Matter (PM) emitted from each source (except source 37) shall not exceed 0.02 grains per dry standard cubic foot (gr/dscf) of exhaust gas.

TAPCR 1200-03-07-.01(5) and the agreement letter dated January 2, 2023.
(Appendix 7)

...

Compliance Method: The permittee shall operate and maintain a baghouse to control PM emissions. The source(s) controlled by the fabric filter(s)/baghouse(s) shall not operate unless each control device(s) is installed and operated. The permittee shall monitor the fabric filter/baghouse control devices for this source as follows:

...

(b) Applies to Sources 12, 15, 19, 31, 33, and 35:

For baghouses with an exhaust gas flow rating of more than 2,000 actual cubic feet per minute, the permittee shall:

- (1) Assure continued compliance by maintaining the “approved” minimum pressure drop across each baghouse as indicated in the table below, recording one pressure drop reading per day while the source is in operation, conducting visual inspections of the exterior of the baghouse and the baghouse ductwork, including the pressure drop, abrasion hole, emissions problem, or plugging problem has developed during an inspection of the baghouse(s), the permittee shall initiate corrective action within 24 hours and complete corrective action as expediently as practical. The permittee shall record all corrective action taken including the initiation and completion of all corrective actions in the log.

Source No.	Baghouse ID/ Name	Minimum Pressure Drop
12	CE-002: Carbon Black Unloading	31 mm W.C.
15	CE-005: Silica Unloading	31 mm W.C.
19	CE-009: Small Chemical Automatic Weighing	124 Pa
31	CE-070: Polymer Conveyors Mixer 1, Line 1	0.5” W.C.
31	CE-040: Polymer Conveyors Mixer 2, Line 2	0.5” W.C.
33	CE-042: Polymer Conveyors Mixer 1, Line 2	0.5” W.C.
35	CE-052: Polymer Conveyors Mixer 1, Line 3	2.0” W.C.

- (2) For lower pressure drop reading(s) resulting from replacement of bags, the permittee shall record the deviation(s) in the log. Due allowance will be made

for lower pressure drop reading(s) which follow the replacement of bags provided the permittee established to the satisfaction of the Technical Secretary that these lower readings resulted from the replacement of bags.

- (3) In summary, the log shall include the initials of the person performing the pressure drop reading and inspection, and corrective action(s)/deviation(s), along with the date, time, and any relevant comments. Days that the source is not in operation shall be noted. These records shall be retained in accordance with **Condition G9**.

IX.

Condition S2-2 of Permit 080473 states:

Production Limitation(s)

The production rate of the surface coating operation to coat tire bladders (Source 43) shall not exceed 12,000 tire bladders during any period of 12-consecutive months. Should the permittee need to modify the source(s) in a manner that increases the production rate, a construction permit shall first be applied for and received in accordance with TAPCR 1200-03-09-.01 prior to making the change.

TAPCR 1200-03-09-.03(8) and the permittee's agreement letter dated January 2, 2023. (**Appendix 7**)

Compliance Method: The permittee shall demonstrate compliance with the production limitation by maintaining a log of the output of actual tire bladders coated during each calendar month and each period of 12-consecutive months. The log in **Appendix 8** shall be retained in accordance with **Condition G9**.

X.

On April 9, 2025, the Division conducted an inspection at the Respondent's facility. Based on a review of the Respondent's record for the period of March 1, 2023, through April 9, 2025, the Division discovered that 534 recorded daily pressure drop readings across 7 baghouses were below the permitted limit for minimum pressure drop set for each baghouse. Additionally, the records reviewed indicated that during the total production of tire bladders for three 12-consecutive month periods exceeded the permitted limit as shown in the table below:

12-Month Period Ending	Production Rate
August 2023	12,323 Tire Bladders

September 2023	12,720 Tire Bladders
October 2023	13,676 Tire Bladders

XI.

On June 24, 2025, and July 8, 2025, the Division issued Notices of Violation (NOV) to the Respondent for the violations identified in Paragraph X. As a corrective action for the violation cited in the NOV dated June 24, 2025, the Respondent submitted a Proposed Schedule of Correction Action (APC115) on July 16, 2025, to the Division. In addition, no corrective action is required for the violation cited in the NOV of July 8, 2025, because November 1, 2023 the Division issued construction permit number 981579, which increased the permitted production rate of tire bladders to 60,000 tire bladders during any period of 12-consecutive months.

VIOLATIONS

XII.

By failing to comply with conditions S1-4(b), and S2-2 of Permit 080473, the Respondent violated Division Rule 1200-03-09-.02(6), which states, in pertinent part:

Operation of each air contaminant source shall be in accordance with the provisions and stipulations set forth in the operating permit, all provisions of these regulations, and all provisions of the Tennessee Air Quality Act.

ORDER AND ASSESSMENT OF CIVIL PENALTY

XIII.

The Respondent is assessed a civil penalty of \$15,750 for violation of the Act and Rules, to be paid to the Department at the following address:

Treasurer, State of Tennessee
 Division of Fiscal Services - Consolidated Fees Section
 Tennessee Department of Environment and Conservation
 Davy Crockett Tower
 500 James Robertson Pkwy, 6th Floor
 Nashville, Tennessee 37243

The civil penalty shall be delivered to the Department on or before the thirty-first day after receipt of this Order and Assessment of Civil Penalty. The case number, APC25-0151, should be clearly written on all correspondence.

RESERVATION OF RIGHTS

In issuing this Order and Assessment of Civil Penalty, the Department does not implicitly or expressly waive any provision of the Act or Rules promulgated thereunder or the authority to assess costs, civil penalties, and/or damages incurred by the State against the Respondent. The Department expressly reserves all rights it has at law and in equity to order further corrective action, assess civil penalties and/or damages, and to pursue further enforcement action including, but not limited to, monetary and injunctive relief. Compliance with this order will be considered as a mitigating factor in determining the need for future enforcement action.

NOTICE OF RIGHTS

The Respondent may appeal this Order and Assessment. Tenn. Code Ann. §§ 68-201-108(a) and 68-201-116(b). To do so, a written petition setting forth the reasons for requesting a hearing must be received by the Technical Secretary within 30 days of the date the Respondent received this Order and Assessment, or this Order and Assessment becomes final. Any petition for review must be directed to TDEC.Appeals@tn.gov. The petition may also be mailed or delivered to Commissioner of the Department of Environment and Conservation, c/o Jenny L. Howard, General Counsel, Department of Environment and Conservation, Davy Crockett Tower, 500 James Robertson Pkwy, 5th Floor, Nashville, Tennessee 37243.

If an appeal is filed, an initial hearing of this matter will be conducted by an Administrative Judge as a contested case hearing. Tenn. Code Ann. § 68-201-108(a); Tenn. Code Ann. § 4-5-301 to -326; Tenn. Comp. R. & Regs. 1360-04-01. Such hearings are legal proceedings in the nature of a trial. Individual respondents may represent themselves or be represented by an attorney licensed to practice law in Tennessee. Artificial respondents (*e.g.*, corporations, limited partnerships, limited liability companies, etc.) cannot engage in the practice of law and therefore may only pursue an appeal through an attorney licensed to practice law in Tennessee. Low-

income individuals may be eligible for representation at reduced or no cost through a local bar association or legal aid organization.

At the conclusion of any initial hearing, the Administrative Judge has the authority to affirm, modify, or deny this Order and Assessment of Civil Penalty, including the authority to increase or decrease the penalty. Tenn. Code Ann. § 68-201-116. The Administrative Judge, on behalf of the Board, has the authority to assess additional damages incurred by the Department including, but not limited to, all docketing expenses associated with the setting of the matter for a hearing, and the hourly fees incurred due to the presence of the Administrative Judge and a court reporter.

Technical questions and other correspondence involving compliance issues should be sent to:

Kevin McLain, Division of Air Pollution Control
Department of Environment and Conservation
Davy Crockett Tower
500 James Robertson Pkwy, 7th Floor
Nashville, Tennessee 37243

Attorneys should contact the undersigned counsel of record. The case number, APC25-0151, should be written on all correspondence regarding this matter.

Issued by the Technical Secretary, Air Pollution Control Board, Department of Environment and Conservation, on Nov 17, 2025



Michelle W Owenby (Nov 17, 2025 14:34:17 CST)

Michelle Walker Owenby
Technical Secretary
Air Pollution Control Board

Reviewed by:

Michael Lewis

Michael D. Lewis
BPR # 033408
Senior Associate Counsel
Department of Environment & Conservation
Davy Crockett Tower
500 James Robertson Parkway, 5th Floor
Nashville, Tennessee 37243
Phone: (615) 308-2770
Email: Michael.d.lewis@tn.gov

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FROM

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U.S. Postal Service®
CERTIFIED MAIL® RECEIPT
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USPS® ARTICLE NUMBER

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Nokian Tyres U.S. Operations LLC
C/o National Registered Agents, Inc.
300 Montvue Road
Knoxville, TN 37919-5546

Label #2

Label #3

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Certified Mail Fee	\$	
Return Receipt (Hardcopy)	\$	4.85
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Certified Mail Restricted Delivery	\$	0.00
Postage	\$	0.00
Total Postage and Fees	\$	0.69

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Here

Sent to: 9.64
Nokian Tyres U.S. Operations LLC
C/o National Registered Agents, Inc.
300 Montvue Road
Knoxville, TN 37919-5546

Reference Information

APC25-0151/OOU

PS Form 3800, Facsimile, July 2015

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Label #5 (OPTIONAL)

DEPARTMENT OF ENVIRONMENT & CONSERVATION
Division of Air Pollution Control
Davy Crockett Tower, 7th Floor
500 James Robertson Parkway
Nashville, TN 37243-1204

Label #6 - Return Receipt Barcode (Sender's Record)



9590 9266 9904 2240 2607 09

Label #7 - Certified Mail Article Number

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Return Receipt (Form 3811) Barcode



9590 9266 9904 2240 2607 09

1. Article Addressed to:
Nokian Tyres U.S. Operations LLC
C/o National Registered Agents, Inc.
300 Montvue Road
Knoxville, TN 37919-5546

2. Certified Mail (Form 3800) Article Number

9414 7266 9904 2240 2607 06

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
 Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type:
 Certified Mail *Restricted*

Reference Information

APC25-0151/OOU

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