

2022 Certificate of Exemption (COE) Renewal
Supplemental Questions and Comments

County: Davidson

1. The crosswalk table (Table 4) seems to show no rules similar to 1200-03-20; Limits on Emissions Due to Malfunctions, Startup and Shutdown. During the last COE cycle, Davidson County indicated there were comparable rules in Metro's rules at 10.56.280. According to *Municode*, as of June 21, 2021 (the most current update), these rules still exist. Please explain.

Section 10.56.280, "Startups, Shutdowns and Malfunctions" is still in place and is the crosswalk equivalent of 1200-03-20. This was simply an omission.

2. Does your local program notify surrounding states (including Tennessee) of new permits or permit modification for Title V sources and allow for a 30 day comment period on those permits as Tennessee does per 1200-03-09-.02(11)?

Yes. Section 13-6(b) of Regulation No. 13, "Part 70 Operating Permit Program" requires notification and a 30 day review by affected states.