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.