

PUBLIC NOTICE

Schlage Lock Company LLC dba Republic Doors and Frames has applied to the Tennessee Department of Environment and Conservation, Division of Air Pollution Control for a significant modification to their major source (Title V) operating permit subject to the provisions of Tennessee Air Pollution Control Regulations 1200-03-09-.02(11) (Title V Regulations). A major source operating permit is required by both the Federal Clean Air Act and Tennessee's air pollution control regulations. However, it should be noted that this facility has a current major source operating permit.

The applicant is **Schlage Lock Company LLC dba Republic Doors and Frames** with a site address of 155 Republic Drive, McKenzie, TN. They have applied for a significant modification to their existing major source operating permit (571108). The proposed modification would incorporate source specific emission limits on volatile organic compounds and hazardous air pollutants (HAP), reducing facility wide HAP emissions to area source levels. The facility has also requested removal of 40 CFR 63, Subpart Mmmm requirements which do not apply to area sources of HAP emissions. This significant modification is conducted pursuant to Tennessee Air Pollution Control Regulations 1200-03-09-.02(11)(f)5(iv). Only the portions of the major source operating permit affected by the significant modification are open to comment during the notice period.

EPA has agreed to treat this draft Part 70 permit as a proposed Part 70 permit and to perform its 45-day review provided by the law concurrently with the public notice period. If any substantive comments are received, EPA's 45-day review period will cease to be performed concurrently with the public notice period. In this case, EPA's 45-day review period will start once the public notice period has been completed and EPA receives notification from the Tennessee Air Pollution Control Division that comments have been received and resolved. The status regarding EPA's 45-day review of these permits and the deadline for submitting a citizen's petition can be found at the following website address:

<https://www.epa.gov/caa-permitting/tennessee-proposed-title-v-permits>

Copies of the application materials and draft permit are available for public inspection during normal business hours at the following locations:

Jackson Environmental Field Office
Division of Air Pollution Control
1625 Hollywood Drive
Jackson, TN 38305

and

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243

Electronic copies of the draft permit and application materials are available by accessing the TDEC internet site located at:

<http://www.tn.gov/environment/topic/ppo-air>

Questions concerning the source(s) may be addressed to Sarosh Kaiser at (615) 532-0585 or by e-mail at sarosh.kaiser@tn.gov

Interested parties are invited to review these materials and comment. In addition, a public hearing may be requested at which written or oral presentations may be made. To be considered, written comments or requests for a public hearing must be received no later than 4:30 PM on June 23, 2021. To assure that written comments are received and addressed in a timely manner, written comments must be submitted using one of the following methods:

1. **Mail, private carrier, or hand delivery:** Address written comments to Ms. Michelle W. Owenby, Director, Division of Air Pollution Control, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue 15th Floor, Nashville, Tennessee 37243.
2. **E-mail:** Submit electronic comments to air.pollution.control@tn.gov.

A final determination will be made after weighing all relevant comments.

Individuals with disabilities who wish to review information maintained at the above-mentioned depositories should contact the Tennessee Department of Environment and Conservation to discuss any auxiliary aids or services needed to facilitate such review. Such contact may be in person, by writing, telephone, or other means, and should be made no less than ten days prior to the end of the public comment period to allow time to provide such aid or services. Contact the Tennessee Department of Environment and Conservation ADA Coordinator, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue 22nd Floor, Nashville, TN 37243, 1-(866)-253-5827. Hearing impaired callers may use the Tennessee Relay Service, 1-(800)-848-0298.

STATE OF TENNESSEE
AIR POLLUTION CONTROL BOARD
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243



**Significant Modification #1 to
OPERATING PERMIT (TITLE V) Issued Pursuant to Tennessee Air Quality Act**

This permit fulfills the requirements of Title V of the Federal Clean Air Act (42 U.S.C. 7661a-7661e) and the federal regulations promulgated thereunder at 40 CFR Part 70. (FR Vol. 57, No. 140, Tuesday, July 21, 1992 p.32295-32312). This permit is issued in accordance with the provisions of paragraph 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations (TAPCR). The permittee has been granted permission to operate an air contaminant source in accordance with emissions limitations and monitoring requirements set forth herein.

Date Issued:

Permit Number:

Date of Significant Modification #1: DRAFT

571108

Date Expires:

Issued To:

Allegion, PLC, c/o Schlage Lock Company, LLC
dba Republic Doors and Frames

Installation Address:

155 Republic Drive
McKenzie

Installation Description: Fabrication and Surface Coating of Steel Doors

Source 01: Adhesive Application

Source 02: Surface Coating Operation: 3 Paint Spray booths (2 automatic and 1 touch up)

Source 05: Dip Coating of Metal Parts

Facility ID: 40-0083

Renewal Application Due Date:

Between August 14, 2021 and November 12, 2021

Primary SIC: 34

Information Relied Upon:

Renewal Applications dated December 1, 2015, and March 7, 2017

Significant Modification #1 request dated January 8, 2020

(continued on the next page)

TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

POST AT INSTALLATION ADDRESS

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ATTACHMENT 2	RESERVED	
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ATTACHMENT 3	RESERVED	
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ATTACHMENT 4	RESERVED	
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SECTION A

GENERAL PERMIT CONDITIONS

A permit issued under the provisions of paragraph 1200-03-09-.02(11) is a permit issued pursuant to the requirements of Title V of the Federal Act and its implementing Federal regulations promulgated at 40 CFR, Part 70.

- A1. Definitions.** Terms not otherwise defined in the permit shall have the meaning assigned to such terms in the referenced regulation.

TAPCR 1200-03

- A2. Compliance requirement.** All terms and conditions in a permit issued pursuant to paragraph 1200-03-09-.02(11) including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act.

The permittee shall comply with all conditions of its permit. Except for requirements specifically designated herein as not being federally enforceable (State Only), non-compliance with the permit requirements is a violation of the Federal Act and the Tennessee Air Quality Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Non-compliance with permit conditions specifically designated herein as not being federally enforceable (State Only) is a violation of the Tennessee Air Quality Act and may be grounds for these actions.

TAPCR 1200-03-09-.02(11)(e)2(i) and 1200-03-09-.02(11)(e)1(vi)(I)

- A3. Need to halt or reduce activity.** The need to halt or reduce activity is not a defense for noncompliance. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this item shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations.

TAPCR 1200-03-09-.02(11)(e)1(vi)(II)

- A4. The permit.** The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

TAPCR 1200-03-09-.02(11)(e)1(vi)(III)

- A5. Property rights.** The permit does not convey any property rights of any sort, or any exclusive privilege.

TAPCR 1200-03-09-.02(11)(e)1(vi)(IV)

- A6. Submittal of requested information.** The permittee shall furnish to the Technical Secretary, within a reasonable time, any information that the Technical Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or termination of the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Technical Secretary copies of records required to be kept by the permit. If the permittee claims that such information is confidential, the Technical Secretary may review that claim and hold the information in protected status until such time that the Board can hear any contested proceedings regarding confidentiality disputes. If the information is desired by EPA, the permittee may mail the information directly to EPA. Any claims of confidentiality for federal purposes will be determined by EPA.

TAPCR 1200-03-09-.02(11)(e)1(vi)(V)

- A7. Severability clause.** The requirements of this permit are severable. A dispute regarding one or more requirements of this permit does not invalidate or otherwise excuse the permittee from their duty to comply with the remaining portion of the permit.

TAPCR 1200-03-09.02(11)(e)1(v)

A8(SM1). Fee payment.

(a) The permittee shall pay an annual Title V emission fee based upon the responsible official's choice of actual emissions, allowable emissions, or a combination of actual and allowable emissions; and on the responsible official's choice of annual accounting period. An emission cap of 4,000 tons per year per regulated pollutant per major source SIC Code shall apply to actual or allowable based emission fees. A Title V annual emission fee will not be charged for emissions in excess of the cap. Title V annual emission fees will not be charged for carbon monoxide or for greenhouse gas pollutants solely because they are greenhouse gases.

(b) Title V sources shall pay allowable based emission fees until the beginning of the next annual accounting period following receipt of their initial Title V operating permit. At that time, the permittee shall begin paying their Title V fee based upon their choice of actual or allowable based fees, or mixed actual and allowable based fees. Once permitted, the Responsible Official may revise their existing fee choice by submitting a written request to the Division no later than December 31 of the annual accounting period for which the fee is due.

(c) When paying annual Title V emission fees, the permittee shall comply with all provisions of 1200-03-26-.02 and 1200-03-09-.02(11) applicable to such fees.

(d) Where more than one (1) allowable emission limit is applicable to a regulated pollutant, the allowable emissions for the regulated pollutants shall not be double counted. Major sources subject to the provisions of paragraph 1200-03-26-.02(9) shall apportion their emissions as follows to ensure that their fees are not double counted.

1. Sources that are subject to federally promulgated hazardous air pollutant under 40 CFR 60, 61, or 63 will place such regulated emissions in the regulated hazardous air pollutant (HAP) category.

2. A category of miscellaneous HAPs shall be used for hazardous air pollutants listed at part 1200-03-26-.02(2)(i)12 that are not subject to federally promulgated hazardous air pollutant standards under 40 CFR 60, 61, or 63.

3. HAPs that are also in the family of volatile organic compounds, particulate matter, or PM₁₀ shall not be placed in either the regulated HAP category or miscellaneous HAP category.

4. Sources that are subject to a provision of chapter 1200-03-16 New Source Performance Standards (NSPS) or chapter 0400-30-39 Standards of Performance for New Stationary Sources for pollutants that are neither particulate matter, PM₁₀, sulfur dioxide (SO₂), volatile organic compounds (VOC), nitrogen oxides (NO_x), or hazardous air pollutants (HAPs) will place such regulated emissions in an NSPS pollutant category.

5. The regulated HAP category, the miscellaneous HAP category, and the NSPS pollutant category are each subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

6. Major sources that wish to pay annual emission fees for PM₁₀ on an allowable emission basis may do so if they have a specific PM₁₀ allowable emission standard. If a major source has a total particulate emission standard, but wishes to pay annual emission fees on an actual PM₁₀ emission basis, it may do so if the PM₁₀ actual emission levels are proven to the satisfaction of the Technical Secretary. The method to demonstrate the actual PM₁₀ emission levels must be made as part of the source's major source operating permit in advance in order to exercise this option. The PM₁₀ emissions reported under these options shall not be subject to fees under the family of particulate emissions. The 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) shall also apply to PM₁₀ emissions.

TAPCR 1200-03-26-.02 and 1200-03-09-.02(11)(e)1(vii)

- A9. Permit revision not required.** A permit revision will not be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or process for changes that are provided for in the permit.

TAPCR 1200-03-09-.02(11)(e)1(viii)

- A10. Inspection and entry.** Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Technical Secretary or an authorized representative to perform the following for the purposes of determining compliance with the permit applicable requirements:

(a) Enter upon, at reasonable times, the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

- (d) As authorized by the Clean Air Act and Chapter 1200-03-10 of TAPCR, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
- (e) "Reasonable times" shall be considered to be customary business hours unless reasonable cause exists to suspect noncompliance with the Act, Division 1200-03 or any permit issued pursuant thereto and the Technical Secretary specifically authorizes an inspector to inspect a facility at any other time.

TAPCR 1200-03-09-.02(11)(e)3.(ii)

A11. Permit shield.

- (a) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date of permit issuance, provided that:
1. Such applicable requirements are included and are specifically identified in the permit; or
 2. The Technical Secretary, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- (b) Nothing in this permit shall alter or affect the following:
1. The provisions of section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section. Similarly, the provisions of T.C.A. §68-201-109 (emergency orders) including the authority of the Governor under the section;
 2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Federal Act; or
 4. The ability of EPA to obtain information from a source pursuant to section 114 of the Federal Act.
- (c) Permit shield is granted to the permittee.

TAPCR 1200-03-09-.02(11)(e)6

A12(SM1). Permit renewal and expiration.

- (a) An application for permit renewal must be submitted at least 180 days, but no more than 270 days prior to the expiration of this permit. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted.
- (b) If the permittee submits a timely and complete application for permit renewal the source will not be considered to be operating without a permit until the Technical Secretary takes final action on the permit application, except as otherwise noted in paragraph 1200-03-09-.02(11).
- (c) This permit, its shield provided in Condition A11, and its conditions will be extended and effective after its expiration date provided that the source has submitted a timely, complete renewal application to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)2 and 3, 1200-03-09-.02(11)(d)1(i)(III), and 1200-03-09-.02(11)(a)2

A13. Reopening for cause.

- (a) A permit shall be reopened and revised prior to the expiration of the permit under any of the circumstances listed below:
1. Additional applicable requirements under the Federal Act become applicable to the sources contained in this permit provided the permit has a remaining term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the permit expiration date of this permit, unless the original has been extended pursuant to 1200-03-09-.02(11)(a)2.
 2. Additional requirements become applicable to an affected source under the acid rain program.
 3. The Technical Secretary or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 4. The Technical Secretary or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (b) Proceedings to reopen and issue a permit shall follow the same proceedings as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists, and not the entire permit. Such reopening shall be made as expeditiously as practicable.
- (c) Reopenings for cause shall not be initiated before a notice of such intent is provided to the permittee by the Technical Secretary at least 30 days in advance of the date that the permit is to be reopened except that the Technical Secretary may provide a shorter time period in the case of an emergency. An emergency shall be established by the criteria of T.C.A.

68-201-109 or other compelling reasons that public welfare is being adversely affected by the operation of a source that is in compliance with its permit requirements.

(d) If the Administrator finds that cause exists to terminate, modify, or revoke and reissue a permit as identified in A13, he is required under federal rules to notify the Technical Secretary and the permittee of such findings in writing. Upon receipt of such notification, the Technical Secretary shall investigate the matter in order to determine if he agrees or disagrees with the Administrator's findings. If he agrees with the Administrator's findings, the Technical Secretary shall conduct the reopening in the following manner:

1. The Technical Secretary shall, within 90 days after receipt of such notification, forward to EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate. If the Administrator grants additional time to secure permit applications or additional information from the permittee, the Technical Secretary shall have the additional time period added to the standard 90 day time period.
2. EPA will evaluate the Technical Secretary's proposed revisions and respond as to their evaluation.
3. If EPA agrees with the proposed revisions, the Technical Secretary shall proceed with the reopening in the same manner prescribed under Condition A13 (b) and Condition A13 (c).
4. If the Technical Secretary disagrees with either the findings or the Administrator that a permit should be reopened or an objection of the Administrator to a proposed revision to a permit submitted pursuant to Condition A13(d), he shall bring the matter to the Board at its next regularly scheduled meeting for instructions as to how he should proceed. The permittee shall be required to file a written brief expressing their position relative to the Administrator's objection and have a responsible official present at the meeting to answer questions for the Board. If the Board agrees that EPA is wrong in their demand for a permit revision, they shall instruct the Technical Secretary to conform to EPA's demand, but to issue the permit under protest preserving all rights available for litigation against EPA.

TAPCR 1200-03-09-.02(11)(f)6 and 7.

A14. Permit transference. An administrative permit amendment allows for a change of ownership or operational control of a source where the Technical Secretary determines that no other change in the permit is necessary, provided that the following requirements are met:

- (a) Transfer of ownership permit application is filed consistent with the provisions of 1200-03-09-.03(6), and
- (b) written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)4(i)(IV) and 1200-03-09-.03(6)

A15. Air pollution alert. When the Technical Secretary has declared that an air pollution alert, an air pollution warning, or an air pollution emergency exists, the permittee must follow the requirements for that episode level as outlined in TAPCR 1200-03-09-.03(1) and TAPCR 1200-03-15-.03.

A16. Construction permit required. Except as exempted in TAPCR 1200-03-09-.04, or excluded in subparagraph TAPCR 1200-03-02-.01(1)(aa) or subparagraph TAPCR 1200-03-02-.01(1)(cc), this facility shall not begin the construction of a new air contaminant source or the modification of an air contaminant source which may result in the discharge of air contaminants without first having applied for and received from the Technical Secretary a construction permit for the construction or modification of such air contaminant source.

TAPCR 1200-03-09-.01(1)(a)

A17. Notification of changes. The permittee shall notify the Technical Secretary 30 days prior to commencement of any of the following changes to an air contaminant source which would not be a modification requiring a construction permit.

- (a) change in air pollution control equipment
- (b) change in stack height or diameter
- (c) change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

TAPCR 1200-03-09-.02(7)

A18. Schedule of compliance. The permittee will comply with any applicable requirement that becomes effective during the permit term on a timely basis. If the permittee is not in compliance the permittee must submit a schedule for coming into compliance which must include a schedule of remedial measure(s), including an enforceable set of deadlines for specific actions.

TAPCR 1200-03-09-.02(11)(d)3 and 40 CFR Part 70.5(c)

A19. Title VI.

(a) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:

1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to Section 82.156.

2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to Section 82.158.

3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to Section 82.161.

(b) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

(c) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR, Part 82, Subpart G, Significant New Alternatives Policy Program.

A20(SM1). 112 (r). Sources which are subject to the provisions of Section 112(r) of the federal Clean Air Act or any federal regulations promulgated thereunder, shall annually certify in writing to the Technical Secretary that they are properly following their accidental release plan. The annual certification is due in the office of the Technical Secretary no later than January 31 of each year. Said certification will be for the preceding calendar year.

TAPCR 1200-03-32-.03(3)

SECTION B

GENERAL CONDITIONS for MONITORING, REPORTING, and ENFORCEMENT

B1. Recordkeeping. Monitoring and related record keeping shall be performed in accordance with the requirements specified in the permit conditions for each individual permit unit. In no case shall reports of any required monitoring and record keeping be submitted less frequently than every six months.

- (a) Where applicable, records of required monitoring information include the following:
1. The date, place as defined in the permit, and time of sampling or measurements;
 2. The date(s) analyses were performed;
 3. The company or entity that performed the analysis;
 4. The analytical techniques or methods used;
 5. The results of such analyses; and
 6. The operating conditions as existing at the time of sampling or measurement.

(b) Digital data accumulation which utilizes valid data compression techniques shall be acceptable for compliance determination as long as such compression does not violate an applicable requirement and its use has been approved in advance by the Technical Secretary.

TAPCR 1200-03-09-.02(11)(e)1(iii)

B2. Retention of monitoring data. The permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

TAPCR 1200-03-09-.02(11)(e)1(iii)(II)II

B3. Reporting. Reports of any required monitoring and record keeping shall be submitted to the Technical Secretary in accordance with the frequencies specified in the permit conditions for each individual permit unit. Reports shall be submitted within 60 days of the close of the reporting period unless otherwise noted. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. Reports required under "State only requirements" are not required to be certified by a responsible official.

TAPCR 1200-03-09-.02(11)(e)1(iii)

B4. Certification. Except for reports required under "State Only" requirements, any application form, report or compliance certification submitted pursuant to the requirements of this permit shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

TAPCR 1200-03-09-.02(11)(d)4

B5. Annual compliance certification. The permittee shall submit annually compliance certifications with terms and conditions contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

- (a) The identification of each term or condition of the permit that is the basis of the certification;
- (b) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;
- (c) The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in B5(b) above. The certification shall identify each deviation and take it into account in the

compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion* or exceedance** as defined below occurred; and

(d) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

* "Excursion" shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

** "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol. 79, No.144, July 28, 2014, pages 43661 through 43667

B6(SM1). Submission of compliance certification. The compliance certification shall be submitted to:

The Tennessee Department of Environment and Conservation Environmental Field Office specified in Section E of this permit	and	Air Enforcement Branch US EPA Region IV 61 Forsyth Street, SW Atlanta, Georgia 30303
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TAPCR 1200-03-09-.02(11)(e)3(v)(IV)

B7. Emergency provisions. An emergency constitutes an affirmative defense to an enforcement action brought against this source for noncompliance with a technology based emission limitation due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

(a) The affirmative defense of the emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

1. An emergency occurred and that the permittee can identify the probable cause(s) of the emergency. "Probable" must be supported by a credible investigation into the incident that seeks to identify the causes and results in an explanation supported by generally accepted engineering or scientific principles.

2. The permitted source was at the time being properly operated. In determining whether or not a source was being properly operated, the Technical Secretary shall examine the source's written standard operating procedures which were in effect at the time of the noncompliance and any other code as detailed below that would be relevant to preventing the noncompliance. Adherence to the source's standard operating procedures will be the test of adequate preventative maintenance, careless operation, improper operation or operator error to the extent that such adherence would prevent noncompliance. The source's failure to follow recognized standards of practice to the extent that adherence to such a standard would have prevented noncompliance will disqualify the source from any claim of an emergency and an affirmative defense.

3. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.

4. The permittee submitted notice of the emergency to the Technical Secretary according to the notification criteria for malfunctions in rule 1200-03-20-.03. For the purposes of this condition, "emergency" shall be substituted for "malfunction(s)" in rule 1200-03-20-.03 to determine the relevant notification threshold. The notice shall include a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding the permittee seeking to establish the occurrence of an emergency has the burden of proof.

(c) The provisions of this condition are in addition to any emergency, malfunction or upset requirement contained in Division 1200-03 or other applicable requirement.

TAPCR 1200-03-09-.02(11)(e)7

B8. Excess emissions reporting.

(a) The permittee shall promptly notify the Technical Secretary when any emission source, air pollution control equipment, or related facility breaks down in such a manner to cause the emission of air contaminants in excess of the applicable emission standards contained in Division 1200-03 or any permit issued thereto, or of sufficient duration to cause damage to property or public health. The permittee must provide the Technical Secretary with a statement giving all pertinent facts, including the estimated duration of the breakdown. Violations of the visible emission standard which occur for less than 20 minutes in one day (midnight to midnight) need not be reported. Prompt notification will be within 24 hours of the malfunction and shall be provided by telephone to the Division's Nashville office. The Technical Secretary shall be

notified when the condition causing the failure or breakdown has been corrected. In attainment and unclassified areas if emissions other than from sources designated as significantly impacting on a nonattainment area in excess of the standards will not and do not occur over more than a 24-hour period (or will not recur over more than a 24-hour period) and no damage to property and or public health is anticipated, notification is not required.

(b) Any malfunction that creates an imminent hazard to health must be reported by telephone immediately to the Division's Nashville office at (615) 532-0554 and to the State Civil Defense.

(c) A log of all malfunctions, startups, and shutdowns resulting in emissions in excess of the standards in Division 1200-03 or any permit issued thereto must be kept at the plant. All information shall be entered in the log no later than twenty-four (24) hours after the startup or shutdown is complete, or the malfunction has ceased or has been corrected. Any later discovered corrections can be added in the log as footnotes with the reason given for the change. This log must record at least the following:

1. Stack or emission point involved
2. Time malfunction, startup, or shutdown began and/or when first noticed
3. Type of malfunction and/or reason for shutdown
4. Time startup or shutdown was complete or time the air contaminant source returned to normal operation
5. The company employee making entry on the log must sign, date, and indicate the time of each log entry

The information under items 1. and 2. must be entered into the log by the end of the shift during which the malfunction or startup began. For any source utilizing continuous emission(s) monitoring, continuous emission(s) monitoring collection satisfies the above log keeping requirement.

TAPCR 1200-03-20-.03 and .04

B9. Malfunctions, startups and shutdowns - reasonable measures required. The permittee must take all reasonable measures to keep emissions to a minimum during startups, shutdowns, and malfunctions. These measures may include installation and use of alternate control systems, changes in operating methods or procedures, cessation of operation until the process equipment and/or air pollution control equipment is repaired, maintaining sufficient spare parts, use of overtime labor, use of outside consultants and contractors, and other appropriate means. Failures that are caused by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions. This provision does not apply to standards found in 40 CFR, Parts 60 (Standards of performance for new stationary sources), 61 (National emission standards for hazardous air pollutants) and 63 (National emission standards for hazardous air pollutants for source categories).

TAPCR 1200-03-20-.02

B10. Reserved.

B11(SM1). Report required upon the issuance of a notice of violation for excess emissions. The permittee must submit within twenty (20) days after receipt of the notice of violation, the data required below. If this data has previously been available to the Technical Secretary prior to the issuance of the notice of violation no further action is required of the violating source. However, if the source desires to submit additional information, then this must be submitted within the same twenty (20) day time period. The minimum data requirements are:

- (a)** The identity of the stack and/or other emission point where the excess emission(s) occurred;
- (b)** The magnitude of the excess emissions expressed in pounds per hour and the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;
- (c)** The time and duration of the emissions;
- (d)** The nature and cause of such emissions;
- (e)** For malfunctions, the steps taken to correct the situation and the action taken or planned to prevent the recurrence of such malfunctions;
- (f)** The steps taken to limit the excess emissions during the occurrence reported, and
- (g)** If applicable, documentation that the air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good operating practices for minimizing emissions.

Failure to submit the required report within the twenty (20) day period specified shall preclude the admissibility of the data for determination of potential enforcement action.

TAPCR 1200-03-20-.06(2), (3) and (4)

SECTION C

PERMIT CHANGES

- C1. Operational flexibility changes.** The source may make operational flexibility changes that are not addressed or prohibited by the permit without a permit revision subject to the following requirements:
- (a) The change cannot be subject to a requirement of Title IV of the Federal Act or Chapter 1200-03-30.
 - (b) The change cannot be a modification under any provision of Title I of the federal Act or Division 1200-03.
 - (c) Each change shall meet all applicable requirements and shall not violate any existing permit term or condition.
 - (d) The source must provide contemporaneous written notice to the Technical Secretary and EPA of each such change, except for changes that are below the threshold of levels that are specified in Rule 1200-03-09-.04.
 - (e) Each change shall be described in the notice including the date, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change.
 - (f) The change shall not qualify for a permit shield under the provisions of part 1200-03-09-.02(11)(e)6.
 - (g) The permittee shall keep a record describing the changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. The records shall be retained until the changes are incorporated into subsequently issued permits.

TAPCR 1200-03-09-.02(11)(a)4 (ii)

- C2. Section 502(b)(10) changes.**
- (a) The permittee can make certain changes without requiring a permit revision, if the changes are not modifications under Title I of the Federal Act or Division 1200-03 and the changes do not exceed the emissions allowable under the permit. The permittee must, however, provide the Administrator and Technical Secretary with written notification within a minimum of 7 days in advance of the proposed changes. The Technical Secretary may waive the 7 day advance notice in instances where the source demonstrates in writing that an emergency necessitates the change. Emergency shall be demonstrated by the criteria of TAPCR 1200-03-09-.02(11)(e)7 and in no way shall it include changes solely to take advantages of an unforeseen business opportunity. The Technical Secretary and EPA shall attach each such notice to their copy of the relevant permit.
 - (b) The written notification must be signed by a facility Title V responsible official and include the following:
 - 1. a brief description of the change within the permitted facility;
 - 2. the date on which the change will occur;
 - 3. a declaration and quantification of any change in emissions;
 - 4. a declaration of any permit term or condition that is no longer applicable as a result of the change; and
 - 5. a declaration that the requested change is not a Title I modification and will not exceed allowable emissions under the permit.
 - (c) The permit shield provisions of TAPCR 1200-03-09-.02(11)(e)6 shall not apply to Section 502(b)(10) changes.

TAPCR 1200-03-09-.02(11)(a)4 (i)

- C3. Administrative amendment.**
- (a) Administrative permit amendments to this permit shall be in accordance with 1200-03-09-.02(11)(f)4. The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.
 - (b) The permit shield shall be extended as part of an administrative permit amendment revision consistent with the provisions of TAPCR 1200-03-09-.02(11)(e)6 for such revisions made pursuant to item (c) of this condition which meet the relevant requirements of TAPCR 1200-03-09-.02(11)(e), TAPCR 1200-03-09-.02(11)(f) and TAPCR 1200-03-09-.02(11)(g) for significant permit modifications.
 - (c) Proceedings to review and grant administrative permit amendments shall be limited to only those parts of the permit for which cause to amend exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)4

C4. Minor permit modifications.

- (a) The permittee may submit an application for a minor permit modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(ii).
- (b) The permittee may make the change proposed in its minor permit modification immediately after an application is filed with the Technical Secretary.
- (c) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.
- (d) Minor permit modifications do not qualify for a permit shield.

TAPCR 1200-03-09-.02(11)(f)5(ii)

C5. Significant permit modifications.

- (a) The permittee may submit an application for a significant modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(iv).
- (b) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)5(iv)

C6. New construction or modifications.

Future construction at this facility that is subject to the provisions of TAPCR 1200-03-09-.01 shall be governed by the following:

- (a) The permittee shall designate in their construction permit application the route that they desire to follow for the purposes of incorporating the newly constructed or modified sources into their existing operating permit. The Technical Secretary shall use that information to prepare the operating permit application submittal deadlines in their construction permit.
- (b) Sources desiring the permit shield shall choose the administrative amendment route of TAPCR 1200-03-09-.02(11)(f)4 or the significant modification route of TAPCR 1200-03-09-.02(11)(f)5(iv).
- (c) Sources desiring expediency instead of the permit shield shall choose the minor permit modification procedure route of TAPCR 1200-03-09-.02(11)(f)5(ii) or group processing of minor modifications under the provisions of TAPCR 1200-03-09-.02(11)(f)5(iii) as applicable to the magnitude of their construction.

TAPCR 1200-03-09-.02(11)(d) 1(i)(V)

SECTION D

GENERAL APPLICABLE REQUIREMENTS

- D1. Visible emissions.** With the exception of air emission sources exempt from the requirements of TAPCR Chapter 1200-03-05 and air emission sources for which a different opacity standard is specifically provided elsewhere in this permit, the permittee shall not cause, suffer, allow or permit discharge of a visible emission from any air contaminant source with an opacity in excess of twenty (20) percent for an aggregate of more than five (5) minutes in any one (1) hour or more than twenty (20) minutes in any twenty-four (24) hour period; provided, however, that for fuel burning installations with fuel burning equipment of input capacity greater than 600 million btu per hour, the permittee shall not cause, suffer, allow, or permit discharge of a visible emission from any fuel burning installation with an opacity in excess of twenty (20) percent (6-minute average) except for one six minute period per one (1) hour of not more than forty (40) percent opacity. Sources constructed or modified after July 7, 1992 shall utilize 6-minute averaging.

Consistent with the requirements of TAPCR Chapter 1200-03-20, due allowance may be made for visible emissions in excess of that permitted under TAPCR 1200-03-05 which are necessary or unavoidable due to routine startup and shutdown conditions. The facility shall maintain a continuous, current log of all excess visible emissions showing the time at which such conditions began and ended and that such record shall be available to the Technical Secretary or an authorized representative upon request.

TAPCR 1200-03-05-.01(1), TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.02(1)

- D2. General provisions and applicability for non-process gaseous emissions.** Any person constructing or otherwise establishing a non-portable air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize the best equipment and technology currently available for controlling such gaseous emissions.

TAPCR 1200-03-06-.03(2)

- D3. Non-process emission standards.** The permittee shall not cause, suffer, allow, or permit particulate emissions from non-process sources in excess of the standards in TAPCR 1200-03-06.

- D4. General provisions and applicability for process gaseous emissions.** Any person constructing or otherwise establishing an air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize equipment and technology which is deemed reasonable and proper by the Technical Secretary.

TAPCR 1200-03-07-.07(2)

- D5. Particulate emissions from process emission sources.** The permittee shall not cause, suffer, allow, or permit particulate emissions from process sources in excess of the standards in TAPCR 1200-03-07.

- D6. Sulfur dioxide emission standards.** The permittee shall not cause, suffer, allow, or permit Sulfur dioxide emissions from process and non-process sources in excess of the standards in TAPCR 1200-03-14. Regardless of the specific emission standard, new process sources shall utilize the best available control technology as deemed appropriate by the Technical Secretary of the Tennessee Air Pollution Control Board.

D7(SM1). Fugitive Dust.

(a) The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions shall include, but not be limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
2. Application of asphalt, water, or suitable chemicals on dirt roads, material stock piles, and other surfaces which can create airborne dusts;
3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

(b) The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five (5) minutes per hour or twenty (20) minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in Chapter 1200-03-20.

TAPCR 1200-03-08

D8. Open burning. The permittee shall comply with the TAPCR 1200-03-04 for all open burning activities at the facility.

TAPCR 1200-03-04

D9. Asbestos. Where applicable, the permittee shall comply with the requirements of TAPCR 1200-03-11-.02(2)(d) when conducting any renovation or demolition activities at the facility.

TAPCR 1200-03-11-.02(2)(d) and 40 CFR, Part 61

D10. Annual certification of compliance. The generally applicable requirements set forth in Section D of this permit are intended to apply to activities and sources that are not subject to source-specific applicable requirements contained in State of Tennessee and U.S. EPA regulations. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related record keeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)1 and compliance requirements of TAPCR 1200-03-09-.02(11)(e)3.(i). The permittee shall submit compliance certification for these conditions annually.

D11(SM1). Emission Standards for Hazardous Air Pollutants. When applicable, the permittee shall comply with the TAPCR 0400-30-38 for all emission sources subject to a requirement contained therein.

TAPCR 0400-30-38

D12(SM1). Standards of Performance for New Stationary Sources. When applicable, the permittee shall comply with the TAPCR 0400-30-39 for all emission sources subject to a requirement contained therein.

TAPCR 0400-30-39

D13(SM1). Gasoline Dispensing Facilities. When applicable, the permittee shall comply with the TAPCR 1200-03-18-.24 for all emission sources subject to a requirement contained therein.

D14(SM1). Internal Combustion Engines.

(a) All stationary reciprocating internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-38-.01.

(b) All stationary compression ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-39-.01.

(c) All stationary spark ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-39-.02.

TAPCR 0400-30-38 and 39

SECTION E

SOURCE SPECIFIC EMISSION STANDARDS, OPERATING LIMITATIONS, and MONITORING, RECORDERKEEPING and REPORTING REQUIREMENTS

40-0083	Facility Description	Fabrication and surface coating of Metal Doors and Frames. Operations at the facility consist of surface preparation, painting, and adhesive coating application to manufacture metal doors
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Conditions E1 through E4 apply to all sources in Section E of this permit unless otherwise noted.

E1(SM1). Fee payment

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 40-0083

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	27.41	AEAR	Includes all fee emissions.
PM₁₀	N/A	N/A	
SO₂	N/A	N/A	
VOC	91.21	AEAR	Includes all fee emissions.
NO_x	N/A	N/A	
CATEGORY OF MISCELLANEOUS HAZARDOUS AIR POLLUTANTS (HAP WITHOUT A STANDARD)*			
VOC FAMILY GROUP	9.91	AEAR	Included in VOC emissions above.
NON-VOC GASEOUS GROUP	N/A	N/A	
PM FAMILY GROUP	N/A	N/A	
CATEGORY OF SPECIFIC HAZARDOUS AIR POLLUTANTS (HAP WITH A STANDARD)**			
VOC FAMILY GROUP	N/A	N/A	
NON-VOC GASEOUS GROUP	N/A	N/A	
PM FAMILY GROUP	N/A	N/A	
CATEGORY OF NSPS POLLUTANTS NOT LISTED ABOVE***			
EACH NSPS POLLUTANT NOT LISTED ABOVE	N/A	N/A	

NOTES

AAP The **Annual Accounting Period (AAP)** is a twelve (12) consecutive month period that **either (a) begins each July 1st and ends June 30th of the following year when fees are paid on a fiscal year basis, or (b) begins January 1st and ends December 31st of the same year when paying on a calendar year basis.** The **Annual Accounting Period** at the time of **Significant Modification #1** issuance **began July 1, 2020 and ends June 30, 2021.** The next Annual Accounting Period begins **July 1, 2021** and ends **June 30, 2022** unless a request to change the annual accounting period is submitted by the responsible official as required by subparagraph 1200-03-26-.02(9)(b) and approved by the Technical Secretary. If the permittee wishes to revise their annual accounting period or their annual emission fee basis as allowed by subparagraph 1200-03-26-.02(9)(b), the responsible official must submit the request to the Division in writing on or before December 31 of the annual accounting period for which the fee is due. If a change in fee basis from allowable emissions to actual emissions for any pollutant is requested, the request from the responsible official must include the methods that will be used to determine actual emissions.

N/A N/A indicates that no emissions are specified for fee computation.

AEAR If the permittee is paying annual emission fees on an actual emissions basis, **AEAR** indicates that an Actual Emissions Analysis is Required to determine the actual emissions of:

- (1) **each regulated pollutant** (Particulate matter, SO₂, VOC, NO_x and so forth. See TAPCR 1200-03-26-.02(2)(i) for the definition of a regulated pollutant.),

- (2) **each pollutant group** (VOC Family, Non-VOC Gaseous, and Particulate Family),
- (3) the **Miscellaneous HAP Category**,
- (4) the **Specific HAP Category**, and
- (5) the **NSPS Category**

under consideration during the **Annual Accounting Period**.

- * **Category of Miscellaneous HAP (HAP without a Standard):** This category is made-up of hazardous air pollutants that do not have a federal or state standard. Each HAP is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation**, the **Miscellaneous HAP Category** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.
- ** **Category of Specific HAP (HAP with a Standard):** This category is made-up of hazardous air pollutants (HAP) that are subject to Federally promulgated Hazardous Air Pollutant Standards that can be imposed under Chapter 1200-03-11 or Chapter 1200-03-31. Each individual hazardous air pollutant is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation**, each individual hazardous air pollutant of the **Specific HAP Category** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(I) of the TAPCR.
- *** **Category of NSPS Pollutants Not Listed Above:** This category is made-up of each New Source Performance Standard (NSPS) pollutant whose emissions are not included in the **PM, SO₂, VOC or NO_x** emissions from each source in this permit. **For fee computation**, each **NSPS pollutant not listed above** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

END NOTES

- The permittee shall:**
- (1) Pay Title V **annual emission fees**, on the emissions and year bases requested by the responsible official and approved by the Technical Secretary, for each annual accounting period (AAP) by the payment deadline(s) established in TAPCR 1200-03-26-.02(9)(g). Fees may be paid on an **actual, allowable, or mixed** emissions basis; and on either a **state fiscal year** or a **calendar year**, provided the requirements of 1200-03-26-.02(9)(b) are met. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within fifteen (15) days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8).
 - (2) Sources paying annual emissions fees on an allowable emissions basis: pay annual allowable based emission fees for each annual accounting period pursuant to TAPCR 1200-03-26-.02(9)(d).
 - (3) Sources paying annual emissions fees on an actual emissions basis: prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
 - (a) the completed **Fee Emissions Summary Table**,
 - (b) each **actual emissions analysis** required, and
 - (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. These calculations must be based on the annual fee basis approved by the Technical Secretary (a state fiscal year [July 1 through June 30] or a calendar year [January 1 through December 31]). These records shall be used to complete the **actual emissions analyses** required by the above **Fee Emissions Summary Table**.
 - (4) Sources paying annual emissions fees on a mixed emissions basis: for all pollutants and all sources for which the permittee has chosen an actual emissions basis, prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
 - (a) the completed **Fee Emissions Summary Table**,
 - (b) each **actual emissions analysis** required, and
 - (c) the actual emission records for each pollutant and each source as required for actual

emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary’s representative. These calculations must be based on the fee bases approved by the Technical Secretary (payment on an actual or mixed emissions basis) and payment on a state fiscal year (July 1 through June 30) or a calendar year (January 1 through December 31). These records shall be used to complete the **actual emissions analysis**.

For all pollutants and all sources for which the permittee has chosen an allowable emissions basis, pay allowable based emission fees pursuant to TAPCR 1200-03-26-.02(9)(d).

- (5) When paying on an actual or mixed emissions basis, submit the **actual emissions analyses** at the time the fees are paid in full.

The annual emission fee due dates are specified in TAPCR 1200-03-26-.02(g) and are dependent on the Responsible Official’s choice of fee bases as described above. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within 15 days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8). Emissions for regulated pollutants shall not be double counted as specified in Condition A8(d) of this permit.

Payment of the fee due and the actual emissions analysis (if required) shall be submitted to The Technical Secretary at the following address:

Payment of Fee to:
 The Tennessee Department of Environment and Conservation
 Division of Fiscal Services
 Consolidated Fee Section – APC
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 10th Floor
 Nashville, Tennessee 37243

Actual Emissions Analyses to:
 The Tennessee Department of Environment and Conservation
 Division of Air Pollution Control
 East Tennessee Permit Program
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 15th Floor
 Nashville, Tennessee 37243

or
 An electronic copy (PDF) of actual emissions analysis can also be submitted to: apc.inventory@tn.gov

E2(SM1). Reporting requirements.

- (a) **Semiannual reports.** Semiannual reports shall cover the six-month periods from January 1 to June 30 and July 1 to December 31 and shall be submitted within 60 days after the end of each six-month period. Subsequent reports shall be submitted within 60 days after the end of each six-month period following the first report. The first report since issuance of this permit shall cover the 6-month period from **January 1, 2017**, to **June 30, 2017**, and shall be submitted within 60 days after the 6-month period ending **June 30, 2017**. Subsequent reports shall be submitted within 60 days after the end of each 6-month period as follows:

Start of Semiannual Report Period	End of Semiannual Report Period	Semiannual Report Due
January 1, 2017	June 30, 2017	August 29, 2017
July 1, 2017	December 31, 2017	March 1, 2018
January 1, 2018	June 30, 2018	August 29, 2018
July 1, 2018	December 31, 2018	March 1, 2019
January 1, 2019	June 30, 2019	August 29, 2019
July 1, 2019	December 31, 2019	February 29, 2020
January 1, 2020	June 30, 2020	August 29, 2020
July 1, 2020	December 31, 2020	March 1, 2021
January 1, 2021	June 30, 2021	August 29, 2021
July 1, 2021	December 31, 2021	March 1, 2022
January 1, 2022	June 30, 2022	August 29, 2022
July 1, 20XX	December 31, 20XX	March 1, 20XX+1
January 1, 20XX+1	June 30, 20XX+1	August 29, 20XX+1

These semiannual reports shall include:

- (1) Any monitoring and recordkeeping required by **Conditions E5-1 (Log #1A and #1B), E5-2 (Log #2), E6-3 (Log #3), E6-4 (Log #4A and #4B), E7-3 (Log #5A and #5B)** of this permit. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (2) The visible emission evaluation readings from **Condition E3-1** of this permit if required. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (3) Identification of all instances of deviations from **ALL PERMIT REQUIREMENTS**.

These reports must be certified by a responsible official consistent with Condition B4 of this permit and shall be submitted to The Technical Secretary at the address in Condition E2(b) of this permit.

TAPCR 1200-03-09-.02(11)(e)1(iii)

- (b) **Annual compliance certification.** The permittee shall submit annually compliance certifications with terms and conditions contained in Sections **A, B, D** and **E** of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

- (1) The identification of each term or condition of the permit that is the basis of the certification;
- (2) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;
- (3) The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in E2(b)2 above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an *excursion or **exceedance as defined below occurred; and
- (4) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

* “Excursion” shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

** “Exceedance” shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

Annual compliance certifications shall cover the 12-month period from January 1 to December 31 and shall be submitted within 60 days after the end of each 12-month period. The first annual compliance certification following issuance of this permit shall cover the 12-month period from **January 1, 2017** to **December 31, 2017** and shall be submitted within 60 days after the 12-month period ending **December 31, 2017**. Subsequent certifications shall be submitted within 60 days after the end of each 12-month period following the first certification.

Start of Annual Compliance Certification Period	End of Annual Compliance Certification Period	Annual Compliance Certification Due
January 1, 2017	December 31, 2017	March 1, 2018
January 1, 2018	December 31, 2018	March 1, 2019
January 1, 2019	December 31, 2019	February 29, 2020
January 1, 2020	December 31, 2020	March 1, 2021

January 1, 2021	December 31, 2021	March 1, 2022
January 1, 20XX	December 31, 20XX	March 1, 20XX+1

These certifications must be certified by a responsible official consistent with Condition B4 of this permit and shall be submitted to: TN APCD and EPA

**Jackson Environmental Field Office
Division of Air Pollution Control
1625 Hollywood Drive
Jackson, Tennessee 38305**

and

**Air Enforcement Branch
US EPA Region IV
61 Forsyth Street, SW
Atlanta, Georgia 30303**

or: APC.JackEFO@tn.gov

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol. 79, No.144, July 28, 2014, pages 43661 through 43667
TAPCR 1200-03-09-.02(11)(e)3(v)

(c) **RESERVED**

(d) **Retention of Records.** All records required by any condition in Section E of this permit must be retained for a period of not less than five years. Additionally, these records shall be kept available for inspection by the Technical Secretary or a Division representative.

TAPCR 1200-03-09-.02(11)(e)1(iii)(II)II

E2-1. Identification of Responsible Official, Technical Contact, and Billing Contact

- (a) The application that was utilized in the preparation of this permit is dated December 1, 2015, and signed by Responsible Official Monte Bowers, Plant Manager of the permitted facility. If this person terminates employment or is assigned different duties and is no longer a Responsible Official for this facility as defined in part 1200-03-09-.02(11)(b)21 of the Tennessee Air Pollution Control Regulations, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Responsible Official and certification of truth and accuracy. All representations, agreement to terms and conditions, and covenants made by the former Responsible Official that were used in the establishment of the permit terms and conditions will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements, and/or covenants.
- (b) The application that was utilized in the preparation of this permit is dated December 1, 2015, and identifies Mark White as the Principal Technical Contact for the permitted facility. If this person terminates employment or is assigned different duties and is no longer the Principal Technical Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Principal Technical Contact and certification of truth and accuracy.
- (c) The application that was utilized in the preparation of this permit is dated December 1, 2015, and identifies Mark White as the Billing Contact for the permitted facility. If this person terminates his/her employment or is assigned different duties such that he/she is no longer the Billing Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Billing Contact and certification of truth and accuracy.

E3. General Permit Requirements.

E3-1. Visible emissions from any stack at this facility shall not exhibit greater than 20% opacity, except for one six-minute period in any one-hour period, and for no more than four six-minute periods in any 24-hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

TAPCR 1200-03-05-.01(1) and 1200-03-05-.03(6)

Compliance method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996 (amended on September 11, 2013) that is enclosed as Attachment 1. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

- E3-2.** The VOC content of solvent-based coatings with a VOC emission standard included in Chapter 1200-03-18 of the Tennessee Air Pollution Control Regulations shall be determined once using the procedures and analyses of EPA Method 24 as stipulated in 1200-03-18-.81 of the Regulations. This determination shall be made for the coating as it is applied, whether complying by 100% complying coatings or weighted average. This information may be obtained by laboratory analyses or from manufacturer or vendor certification stating the VOC content was determined by EPA Method 24.

The VOC content of water-based coatings and thinners shall be determined by safety data sheets or from manufacturer or vendor formulation data which explicitly list VOC content by weight.

The VOC content of any new coating shall be determined as stated above. The results of all of these determinations for both existing and new coatings for the emission source of concern shall also be compiled in a tabular or spreadsheet format and maintained at the source location. This information shall be retained for a period of at least five years and shall be made available for inspection by the Technical Secretary or his representative.

TAPCR 1200-03-18

- E3-3.** Purchase orders and/or invoices or any other documentation for all VOC- and hazardous air pollutant (HAP)-containing materials along with safety data sheets (environmental data sheets or technical data sheets are preferable) must be maintained and kept available for inspection by the Technical Secretary or a Division representative. These records must be retained for a period of not less than five years.

TAPCR 1200-03-10-.02(2)(a)

- E3-4.** Routine maintenance as required to comply with the specified emission limits shall be performed on the air pollution control devices. Monthly logs of maintenance and/or repair for each air pollution control device shall be kept. The logs shall denote what maintenance and what repair was done, when it was done, by whom, and when problems were rectified denoting date accomplished. Uses of computer-generated logs are also acceptable. Each maintenance/repair log must be made available upon request by the Technical Secretary or a Division representative. Such logs must be maintained for 5 years. Records from these logs are not required to be submitted semiannually unless required in **Condition E2(a)(1)**.

TAPCR 1200-03-09-.02(11)(e)1(iii)

E3-5(SM1). RESERVED

- E3-6.** Logs and records specified in this permit shall be made available upon request by the Technical Secretary or a Division representative and shall be retained for a period of not less than five years unless otherwise noted. Logs and records contained in this permit may be based on a recommended format. Any logs that have an alternative format may be utilized provided such logs contain the same information that is required. Computer-generated logs are also acceptable. Logs and records are not required to be submitted semiannually unless specified in **Condition E2(a)(1)**.

TAPCR 1200-03-10-.02(2)(a)

- E3-7.** Upon the malfunction/failure of any emission control device(s) serving this source, the operation of the process(es) served by the device(s) shall be regulated by Chapter 1200-03-20 of the Tennessee Air Pollution Control Regulations.

TAPCR 1200-03-20

- E3-8.** Regarding recordkeeping of logs, the following is applicable:

- (a) For monthly recordkeeping, all data, including the results of all calculations, must be entered into the log no later than 30 days from the end of the month for which the data is required.
- (b) For weekly recordkeeping, all data, including the results of all calculations, must be entered into the log no later than seven days from the end of the week for which the data is required.
- (c) For daily recordkeeping, all data, including the results of all calculations, must be entered into the log no later than seven days from the end of the day for which the data is required.

TAPCR 1200-03-10-.02(2)(a)

E3-9(SM1). Insignificant activities (as defined at TAPCR 1200-03-09-.04(5)) for this facility are listed in the approved application dated January 8, 2020. Additional insignificant activities may be added and operated at any time with the provision that a written notification shall be submitted to the Technical Secretary, including an updated APC 2 application form along with a truth, accuracy, and completeness statement signed by a responsible official.

E3-10(SM1). RESERVED

E3-11(SM1). RESERVED

E3-12(SM1). The maximum facility-wide emission rate for any single HAP, listed pursuant to Section 112(b) of the Federal Clean Air Act, including emissions from insignificant activities, shall not exceed 9.9 tons during all intervals of 12 consecutive months. Total emissions of all HAP from the entire facility, including emissions from insignificant activities, shall not exceed 24.9 tons during all intervals of 12 consecutive months.

TAPCR 1200-03-07-.07(2)

Compliance Method: The permittee shall calculate actual quantities of each individual HAP and total HAP emitted from the facility during each month and each period of 12 consecutive months. Records of emissions shall be maintained as specified in **Conditions E5-1, E6-4, and E7-3.**

E4(SM1). RESERVED

40-0083-01 Adhesive Application: This source is made-up of one spray booth with water wash exhaust control.

Conditions E5-1 and E5-2 apply to source 40-0083-01

E5-1(SM1). A. VOC emitted from this source shall not exceed 28.3 tons during all intervals of 12 consecutive months.

TAPCR 1200-03-07-.07(2) and the application dated January 8, 2020

B. Total HAP emitted from this source shall not exceed 9.81 tons during all intervals of 12 consecutive months.

TAPCR 1200-03-07-.07(2) and the application dated January 8, 2020

Compliance Method: The permittee shall calculate actual quantities of VOC and **total** HAP emitted from this source during each month and each period of 12 consecutive months and maintain a log of this information (Log #1A, or a similar log that contains the same required information). Purchase records shall be maintained in accordance with **Condition E3-3.** Logs and records shall be submitted semiannually in accordance with **Condition E2(a)1.**

LOG #1A
MONTHLY VOC/HAP EMISSIONS LOG FOR SOURCE 40-0083-01

MONTH/YEAR:

Material Name	Usage (gal/month)	VOC Content (pounds/gal)	VOC Emissions (tons/month)	HAPp Content (pounds/gal)	HAPp, Emissions (tons/month)	Total HAP Emissions (tons/month)
Adhesive 1						
Adhesive 2						
Thinner/Solvent						
Clean-up solvent						
TOTALS						

LOG #1B

12-MONTH TOTAL VOC/HAP EMISSIONS FOR SOURCE 40-0083-01

MONTH/YEAR	VOC Emissions (tons/month)	VOC Emissions* (tons/12 months)	TOTAL HAP Emissions (tons/ month)	TOTAL HAP Emissions* (tons/months)

* The Tons per 12 Month value is the sum of the VOC (or HAP) emissions in the 11 months preceding the month just completed + the VOC (or HAP) emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this log, this value will be equal to the value for tons per month. For the second month, it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed, that is, 6 (2) represents 6 tons emitted in 2 months.

E5-2. Particulate matter (PM) emitted from this source shall not exceed 0.02 grains per dry standard cubic foot of exhaust gas (total 5.1 lbs/hr based on a maximum total flow rate of 30,000 dscfm for the two stacks).

TAPCR 1200-03-07-.04(1)

Compliance Method: Compliance with this condition shall be assured by maintaining a monthly log of exhaust filter inspections and filter replacement for the exhaust filter control (Log #2, or a similar log that contains the same required information). This log shall be maintained for a period of not less than five years and kept available for inspection by the Technical Secretary or a Division representative. All data must be entered in the log in accordance with **Condition E3-8** of this permit. Logs and records shall be submitted semiannually in accordance with **Condition E2(a)(1)** of this permit.

LOG #2

MONTHLY MAINTENANCE LOG OF SOURCE (40-0083-01)

Date (day/month/year)	Fan I.D #	Repair/Maintenance Performed	Initials of Person making log entry

40-0083-02 Surface Coating Operation: This source is made-up of three paint spray booths, two automatic and one touch-up booth. All booths are equipped with exhaust filters.

Conditions E6-1 through E6-4 apply to source 40-0083-02

E6-1(SM1). A. VOC emitted from this source shall not exceed 28.22 tons during any period of 12 consecutive months.

TAPCR 1200-03-18-.02(2) and the application dated January 8, 2020

B. Total HAP emitted from this source shall not exceed 0.016 tons during all intervals of 12 consecutive months.

TAPCR 1200-03-07-.07(2) and the application dated January 8, 2020

Compliance Method: The permittee shall calculate actual quantities of VOC and total HAP emitted from this source

during each month and each period of 12 consecutive months and maintain a record of VOC and HAP emissions as specified in **Condition E6-4**. Purchase records shall be maintained in accordance with **Condition E3-3**. Logs and records shall be submitted semiannually in accordance with **Condition E2(a)1**.

E6-2. The monthly weighted-average VOC content of coatings applied (excluding clean up) shall not exceed 3.5 pounds per gallon, excluding water and/or exempt compounds, as applied.

TAPCR 1200-03-18-.20(3)(b) and 1200-03-18-.02(9)

Compliance Method: Compliance with this condition shall be assured by maintaining monthly records of material usage, VOC emissions, and VOC content as required in **Condition E6-4**.

E6-3. PM emitted from this source shall not exceed 0.02 grains per dry standard cubic foot (combined total of 2.16 lb/hr based on a maximum flow rate of 12,600 dscfm).

TAPCR 1200-03-07-.04(1)

Compliance Method: No surface coating shall occur in any spray booth without use of exhaust filter control. A record of inspections and dates on which filters are replaced shall be summarized in a log (Log #3, or a similar log that contains the same required information). This log shall be maintained in accordance with **Condition E3-4** of this permit. Logs and records shall be submitted semiannually in accordance with **Condition E2(a)(1)** of this permit.

**LOG #3
MONTHLY MAINTENANCE LOG FOR SPRAY BOOTHS (40-0083-02)**

Date Day/month/year	Spray Booth I.D. #	Filter Inspection Performed	Filter Replaced	Initials of Person making log entry

E6-4. The permittee shall maintain logs of coating(s), thinner(s) and clean up solvent(s) usage records (LOGS #4A and #4B, or similar logs that provide the same required information) and calculate the actual quantity of HAP and VOC emitted during each month and each period of 12 consecutive months. All data shall be entered in accordance with **Condition E3-8**. This documentation shall be maintained at facility for not less than five years. Logs and records shall be submitted semiannually in accordance with **Condition E2(a)1**.

**LOG #4A
MONTHLY VOC/HAP EMISSIONS LOG (40-0083-02)**

Month/Year:									
Material Name	Usage (gal/month)	Water/Exempt Compounds (wt%)	Adjusted Usage ¹ (gal/month)	VOC Content (lb/gal)	VOC Emissions (tons/month)	HAP _p Content (pounds/gal)	HAP _p Emissions (tons/month)	Total HAP Content(poun ds/gal)	Total HAP Emissions (tons/month)
Coating									
Coating; ²									
Thinner/Solvent									
SUBTOTALS:									
Clean up solvent									
TOTAL:									

Notes:

1. Adjusted usage is in gallons per month, excluding water and exempt compounds.
2. i = 1, 2, 3... n = the number of different coatings/materials.
3. p = 1, 2, 3... m = the number of different hazardous air pollutants.
4. q = 1, 2, 3... r = the number of different thinners/solvents added to coatings.
5. Use rows as required for the number of different coatings or thinners/solvents and columns as required for the number of different hazardous air pollutants.

**LOG #4B
12-MONTH VOC/HAP EMISSIONS LOG (40-0083-02)**

MONTH/YEAR	VOC Emission (tons/month)	VOC Emissions (tons/12 months)	Total HAP Emissions (tons/month)	Total HAP Emissions (tons/12 months)

* The Tons per 12 Month value is the sum of the VOC (or HAP) emissions in the 11 months preceding the month just completed + the VOC (or HAP) emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this log, this value will be equal to the value for tons per month. For the second month, it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed, that is, 6 (2) represents 6 tons emitted in 2 months.

40-0083-05 Surface Coating Operation: Dip Coating of Metal Parts

Conditions E7-1 through E7-4 apply to source 40-0083-05

E7-1(SM1). Volatile organic compounds emitted from this source shall not exceed 34.5 tons during any period of 12 consecutive months.

TAPCR 1200-03-18-.02(2) and application dated January 20, 2020.

Compliance Method: The permittee shall calculate actual quantities of VOC emitted from this source during each month and each period of 12 consecutive months and maintain records of VOC emissions as required in **Condition E7-3**.

E7-2. The monthly weighted-average VOC content of coatings applied (excluding clean up) shall not exceed 3.5 pounds per gallon, excluding water and/or exempt compounds, as applied.

TAPCR 1200-03-18-.20(3)(b) and 1200-03-18-.02(9)

Compliance Method: Compliance with this condition shall be assured by maintaining monthly records of material usage, VOC emissions, and VOC content as required by **Condition E7-3**.

E7-3. The permittee shall maintain monthly and yearly logs of coating, thinner and clean up solvent usage records (LOGS #5A and #5B, or similar logs that provide the same required information) and calculate actual quantities of VOC and HAP emitted during each month and each period of 12 consecutive months. All data shall be entered in accordance with **Condition E3-8**. This documentation shall be maintained at facility for not less than five years.

**LOG #5A
MONTHLY VOC/HAP EMISSIONS LOG (40-0083-05)**

Month/Year:									
Material Name	Usage (gal/month)	Water/Exempt Compounds (wt%)	Adjusted Usage ¹ (gal/month)	VOC Content (lb/gal)	VOC Emissions (tons/month)	HAP _p Content (pounds/gal)	HAP _p Emissions (tons/month)	Total HAP Content (pounds/gal)	Total HAP Emissions (tons/month)
Coating									
Coating _i ²									
Thinner/Solvent									
SUBTOTALS:									
Clean up solvent									
TOTAL:									

Notes:

1. Adjusted usage is in gallons per month, excluding water and exempt compounds.
2. $i = 1, 2, 3 \dots n$ = the number of different coatings/materials.
3. $p = 1, 2, 3 \dots m$ = the number of different hazardous air pollutants.
4. $q = 1, 2, 3 \dots r$ = the number of different thinners/solvents added to coatings.
5. Use rows as required for the number of different coatings or thinners/solvents and columns as required for the number of different hazardous air pollutants.

LOG #5B
12-MONTH VOC/HAP EMISSIONS LOG (40-0083-05)

MONTH/YEAR	VOC Emissions (tons/month)	VOC Emissions* (tons/12 months)	TOTAL HAP Emissions (tons/month)	Total HAP Emissions* (tons/12 months)

* The Tons per 12 Month value is the sum of the VOC (or HAP) emissions in the 11 months preceding the month just completed + the VOC (or HAP) emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this log, this value will be equal to the value for tons per month. For the second month, it will be the sum of the first month and the second month.

END OF THE TITLE V PERMIT NUMBER 571108

ATTACHMENT 1

**OPACITY MATRIX DECISION TREE for
VISIBLE EMISSION EVALUATION METHOD 9
dated June 18, 1996 and amended September 11, 2013**

Decision Tree PM for Opacity for Sources Utilizing EPA Method 9*

Notes:

PM = Periodic Monitoring required by 1200-03-09-.02(11)(e)(iii).

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring and testing requirements of Title V for demonstrating compliance with the visible emission standards set forth in the permit. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring – Proposed 40 CFR 64).

Examine each emission unit using this Decision Tree to determine the PM required.*

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing EPA Method 9. The observer must be properly certified to conduct valid evaluations.

Typical Pollutants
Particulates, VOC, CO, SO₂, NO_x, HCl, HF, HBr, Ammonia, and Methane.

Initial observations are to be repeated within 90 days of startup of a modified source, if a new construction permit is issued for modification of the source.

A VEE conducted by TAPCD personnel after the Title V permit is issued will also constitute an initial reading.

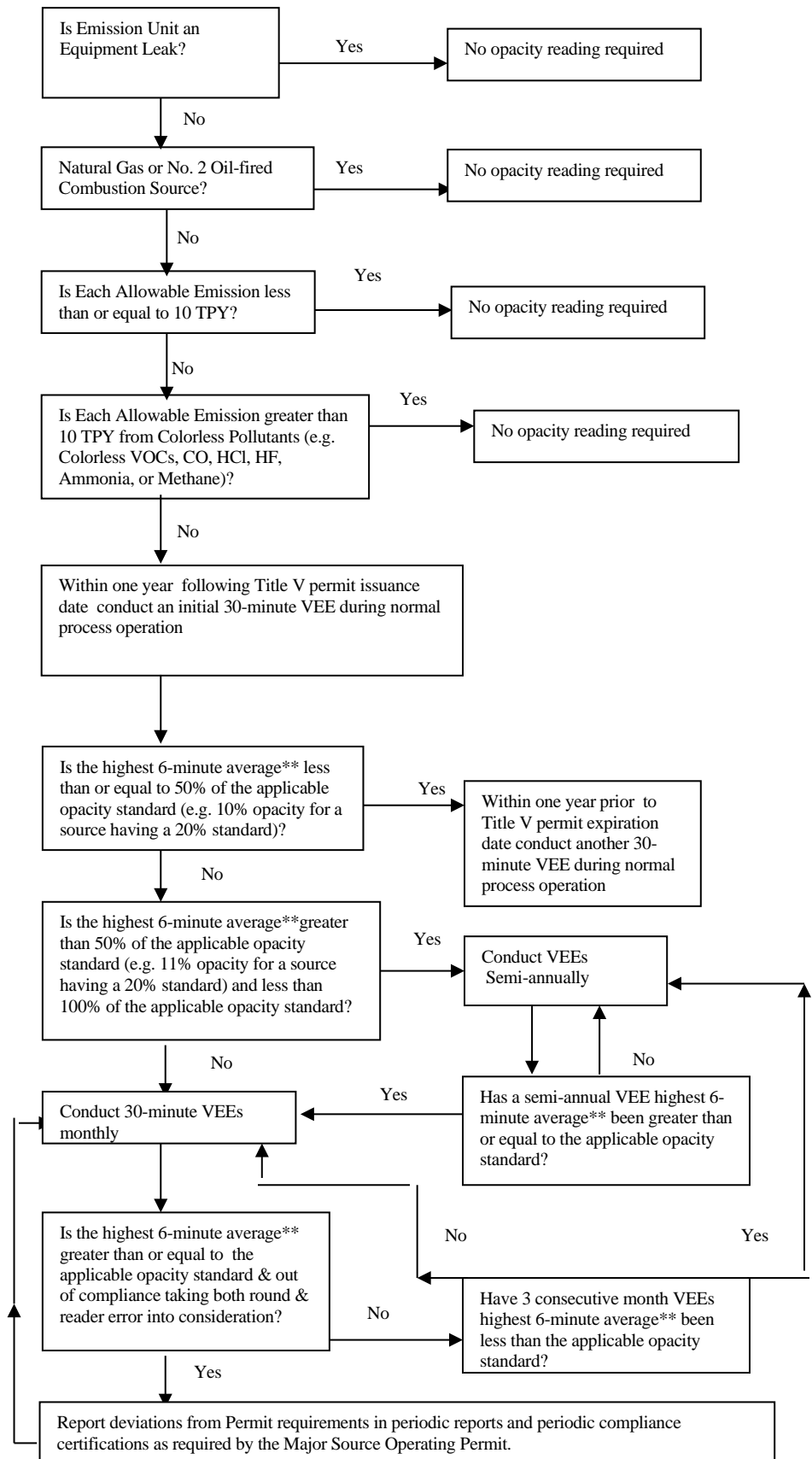
Reader Error
EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards:
The TAPCD guidance is to declare non-compliance when the highest six-minute average** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

EPA Method 9, NSPS or NESHAPS stipulate opacity standards:
EPA guidance is to allow only engineering round. No allowance for reader error is given.

*Not applicable to Asbestos manufacturing subject to 40 CFR 61.142

**Or second highest six-minute average, if the source has an exemption period stipulated in either the regulations or in the permit.

Dated June 18, 1996
Amended September 11, 2013



ATTACHMENT 2

RESERVED

ATTACHMENT 3

RESERVED

ATTACHMENT 4

RESERVED

TITLE V PERMIT STATEMENT

(Significant Modification #1)

Facility Name: Allegion, PLC, c/o Schlage Lock Company, LLL dba Republic Doors and Frames
City: McKenzie
County: Henry

Date Application Received: December 1, 2015; March 7, 2017
Date Application Deemed Complete: December 1, 2015

Emission Source Reference No.: 40-0083
Permit No.: 571108

INTRODUCTION

This narrative is being provided to assist the reader in understanding the content of the attached Title V operating permit. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-03-09-.02(11)(f)1.(v). The primary purpose of the Title V operating permit is to consolidate and identify existing state and federal air requirements applicable to **Allegion, PLC, c/o Schlage Lock Company, LLC dba Republic Doors and Frames** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

Acronyms:

PSD	Prevention of Significant Deterioration
NESHAP	National Emission Standards for Hazardous Air Pollutants
NSPS	New Source Performance Standards
MACT	Maximum Achievable Control Technology
NSR	New Source Review

I. Identification Information.

- A. Source Description.** Republic Doors and Frames is a manufacturer of metal doors. This facility consists of the following sources:

Source -01: Adhesive Application
Source -02: Surface Coating Operation, 3 Paint Spray booths (2 automatic and touch up painting)
Source -05: Dip Coating of Metal Parts

B. Facility Classification.

1. **Attainment or Non-Attainment Area Location.** Area is designated as an attainment area for all criteria pollutants.
2. The facility is located in a *Class II* Area for PSD purposes.

C. Regulatory Status.

1. **PSD/NSR.** This facility *is not* a major source under PSD.
2. **Title V Major Source Status by Pollutant.**

Pollutant	Is the pollutant emitted?	If emitted, what is the facility's status?	
		Major Source Status	Non-Major Source Status
PM	YES	NO	
PM ₁₀	YES	NO	
SO ₂	NO	NO	
VOC	YES	NO	
NO _x	NO	NO	
CO	NO	NO	
Individual HAP	YES	NO	
Total HAPs	YES	NO	

3. **MACT Standards.** This facility is no longer a major source for HAPs. This facility is NOT currently subject to any MACT standard. The facility submitted documentation to demonstrate that potential emissions of VOC and HAP are below the major source thresholds (see Significant Modification application dated January 8, 2020).
4. **Program Applicability.** Are the following programs applicable to the facility?

PSD *no* *yes*
 NESHAP *no* *yes*
 NSPS *no* *yes*

II. Compliance Information.

- A. Compliance Status.** Is the facility currently in compliance with all applicable requirements?
 no *yes*
 Are there any applicable requirements that will become effective during the permit term?
 no *yes*

III. Other Requirements.

- Emissions Trading.** The facility is not involved in an emission-trading program.
- Acid Rain Requirements.** This facility is not subject to any requirements in Title IV of the Clean Air Act.
- Prevention of Accidental Releases.** The facility is not subject to requirements of Rule 1200-03-12 of the Tennessee Air Pollution Control Regulations.
- Green House Gas Emissions.** A revision to the Title V indicated that the “potential to emit” tonnage is less than 100,000 tons per year of combined carbon dioxide equivalent tons. Therefore, this facility is not a major GHG emitter.
- Compliance Assurance Monitoring (CAM)** This facility is not currently subject to regulation under 40 CFR part 64 (Compliance Assurance Monitoring).

IV. Public Participation Procedures.

Notification of this draft permit was mailed to the following environmental agencies:

1. EPA Region IV
2. Kentucky Department for Environmental Protection

V. Public Participation Important Dates:

EPA concurrent review requested	Yes
Public Notice publication date	March 27, 2017
Public Notice period completion date	April 26, 2017
Public Notice publication comments	None
<u>EPA Notification date</u>	March 27, 2017
EPA review period completion date	May 11, 2017
EPA review comments	None

VI. Plantwide Allowable Emissions

Pollutant	Facility Wide Allowable (tons per 12-month period)
VOC	91.21 (facility-wide) {Facility wide VOC's = 0.25 (Fuel Burning VOC) + 90.96 (Evaporative VOC)} Source 01: 28.26; Source 02: 28.22 and Source 05: 34.48
PM ₁₀	27.41 (facility wide)
HAP (Total)	9.91

VII. Permit Modifications occurring since issuance of Permit Number 571108 on May 12, 2017

This Title V Operating Permit No. 571108 represents the third renewal of the initial Title V Permit No. 548333 issued September 24, 1999.

A. Significant Modification #1

- Significant Modification Application dated January 8, 2020
- The Sig Mod reflects the facility request to establish HAP limits and remove the NESHAP requirements associated with 40 CFR 63, Subpart M- Miscellaneous Metal Parts and Products Surface Coating. Individual source HAP limits have been applied to Source -01 (9.81 tons/12 months) and -02 (0.016 tons/12 months), per the facility request. The application states that there are no HAP Emissions from Source -03.
- The facility PTE calculations demonstrate they are no longer a major source of HAP emissions, the facility-wide PTE for HAP emissions is less than 10 tons/year.
- Sections A, B, C, D, and E were updated as per the new Title V permit template.
- Condition E1 has been updated as per new template and revised to show with new VOC allowable emissions in the Summary Table and AEAR under the Actual emissions column.
- Condition E2(c) has been revised to remove the NESHAP Report requirement for 40 CFR 63 Subpart M and now shows RESERVED.
- Condition A8 and A20 has been updated under General Conditions. Conditions D11 through D14 have been added under General Conditions.
- Condition E3-5 has been removed and shows RESERVED since its already addressed in Condition A20.

- Condition E3-9 about the insignificant activities has been modified.
- Conditions E3-10 and E3-11 have been removed and shows RESERVED. That information has been moved to this Statement of Basis.
- Condition E3-12 has been added to include facility-wide HAP limits.
- Condition E4 has been removed and shows RESERVED
- Condition E5-1 has been revised to reflect new allowable VOC emissions and to establish allowable HAP emissions.
- Condition E6-1 has been revised to reflect new allowable VOC emissions and to establish allowable HAP emissions.
- Condition E7-1 has been revised to reflect the new allowable VOC emission limit.
- Attachment 2, 3 and 4 now show RESERVED since 40 CFR 63, Subpart M- Miscellaneous Metal Parts and Products Surface Coating is not applicable anymore.
- The Plantwide Allowable Emission table has been updated in the Statement of Basis.