

PUBLIC NOTICE

Tennessee Coatings, Incorporated dba Ellison Surface Technologies (Tennessee Coatings) has applied to the Tennessee Air Pollution Control Division (TAPCD) for a federally enforceable state operating permit to opt out of being subject to the provisions of paragraph 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations (also frequently referred to as Title V regulations). Tennessee Coatings has agreed to be bound by a permit that limits their potential to emit for volatile organic compounds (VOC) and hazardous air pollutants (HAP) such that they are below the applicability thresholds for VOC of 100 tons per year, for a single HAP of 10 tons per year, and for any combination of HAPs of 25 tons per year. Tennessee Coatings has agreed to use record keeping methods to prove that they are abiding by more restrictive emission limits.

The applicant is Tennessee Coatings, Incorporated dba Ellison Surface Technologies with a site address of 1237 Knoxville Highway, Wartburg, TN 37887. They seek to obtain a Conditional Major operating permit for their surface coating operation which prepares and applies Teflon coatings, solid/dry lubricants, and powder coatings for the elastomers, automotive, and industrial markets. It should be noted that the company has a current Title V operating permit for this facility.

The TAPCD has made the determination that this facility can be approved to opt out of being subject to Title V regulations if certain conditions are met. A copy of the materials used by the TAPCD in making this determination and a copy of the draft permit are available for public inspection during normal business hours at the following locations:

Knoxville Environmental Field Office and
Division of Air Pollution Control
3711 Middlebrook Pike
Knoxville, Tennessee 37921

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 permits are available by accessing the TDEC internet site located at:

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

At this time, visitors are seen at the Environmental Field Office by appointment only. You should contact the Environmental Field Office for an appointment to review the document by calling (865) 594-6035.

Questions concerning the source(s) may be addressed to John Fuss at (615) 532-0535 or by e-mail at John.Fuss@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 July 23, 2020. 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.

For the **Morgan County** "*Morgan County News*" -- publish **once** during the time period of June 16, 2020, through June 23, 2020.

Air Pollution Control DATE: JUNE 10, 2020
Assigned to – John Fuss

No alterations to the above are allowed:

Tennessee Coatings, Incorporated dba Ellison Surface Technologies must pay to place this advertisement in the newspaper

Air Pollution Control must be furnished with an affidavit from the newspaper stating that the ad was run and the date of the ad or one complete sheet from the newspaper showing this advertisement, the name of the newspaper and the date of publication. Mail to John Fuss, Division of Air Pollution Control, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue 15th Floor, Nashville, Tennessee 37243.



Operating Permit (Conditional Major) Issued Pursuant to Tennessee Air Quality Act

Date Issued: DRAFT

Permit Number

476601

Date Expires: DRAFT

Facility ID: **65-0044**

Issued To:

Installation Address

Tennessee Coatings, Incorporated dba
Ellison Surface Technologies

1237 Knoxville Highway
Wartburg

Installation Description

Emission Source Reference No.

Facility prepares and applies Teflon coatings, solid/dry lubricants,
and powder coatings for the elastomers, automotive, and industrial markets.

65-0044-00

65-0044-01: 14 Tumbler Coating Sprayers
65-0044-02: Two Centrifugal Coating Machines
65-0044-03: Two Surface Coating Spray Booths
65-0044-06: Two Thermal Coating Spray Booths

40 CFR Part 63, Subpart WWWW

The holder of this permit shall comply with the conditions contained in this permit as well as all applicable provisions of the Tennessee Air Pollution Control Regulations (TAPCR).

CONDITIONS:

- G1. The application that was utilized in the preparation of this permit is dated March 14, 2019, and signed by Barbara York, Quality Manager for the permitted facility. Notification was received January 24, 2020 that Bobby Hively, Site Manager is now the responsible official for this facility. If this person terminates their employment or is assigned different duties and is no longer the responsible person to represent and bind the facility in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification shall be in writing and submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the facility in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit 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 covenants.

TAPCR 1200-03-09-.03(8)

(conditions continued on 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

SECTION I: The following conditions shall apply to all sections of this permit unless otherwise noted.

G2. The permittee has elected to opt-out of being issued a major source operating permit pursuant to Division Rule 1200-03-09-.02(11)(a). The permittee is considered a major source because their potential to emit value for volatile organic compounds (VOC) was greater than 100 tons per year at the time of application and their potential to emit values for hazardous air pollutants (HAP) were greater than 10 tons per year for a single HAP and greater than 25 tons per year for combined HAP emissions at the time of application. The permittee has agreed to be subject to limitations in order to be below the major source applicability thresholds for VOC of 100 tons per year, and for single and combined HAPs of 10 and 25 tons per year, respectively.

G3. The permittee is placed on notice that **Conditions G5** and **G6** contain limitations that allow the permittee to opt-out of the major source operating permit program requirements specified in Division Rule 1200-03-09-.02(11). Failure to abide by these limitations will not only subject the permittee to enforcement action by the State of Tennessee, but it may also result in the imposition of federal enforcement action by the United States Environmental Protection Agency and the loss of being federally recognized as a conditional major source.

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

G4. Any noncompliance with any condition(s) of this permit set to restrain the potential to emit below the applicability thresholds of 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations, shall be reported in writing to the Technical Secretary within 15 working days of such discovery. This notification, at a minimum, shall include the identification of the source(s), identification of the permit condition(s) violated and details of the non-compliance.

G5. Total emissions of VOC from this facility (including emissions from insignificant sources) shall not exceed 50.0 tons during all intervals of 12 consecutive months. VOC emissions from insignificant sources are estimated to be less than 1.0 ton per year. This value (1.0 ton per year) shall be added to the total VOC emitted from permitted sources during each period of 12 consecutive months.

TAPCR 1200-03-09-.02(11)(a) and the limitation request included in the permit application dated March 14, 2019

Compliance Method: Compliance with these emission limitations shall be demonstrated by calculating the actual quantity of VOC emitted from the facility during each month and during each period of 12 consecutive months. Records of VOC emissions shall be maintained as described in **Condition G6**.

G6. The maximum emission rate from the entire facility for any single hazardous air pollutant (HAP) listed pursuant to Section 112(b) of the Federal Act, including emissions from all exempt and insignificant sources, shall not exceed **9.0** tons during any period of 12 consecutive months. Total emissions of all HAPs from the entire facility, including emissions from all exempt and insignificant sources, shall not exceed **24.0** tons during any period of 12 consecutive months.

TAPCR 1200-03-09-.02-(11)(a) and the limitation request included in the permit application dated March 14, 2019

Compliance Method: The permittee shall calculate the actual quantities of VOC, each individual HAP, and total HAP emitted from this facility during each calendar month and each period of 12 consecutive months. The permittee shall maintain records of the material usage, material density, and VOC and HAP content used to calculate these emissions in a log using the following format, or a similar format that contains the same required information. The as-supplied VOC and HAP content of all VOC- and HAP-containing materials to be used by this source shall be determined from Safety Data Sheets (SDS) or manufacturer or vendor formulation data which explicitly lists the VOC and HAP content by weight. All logs, along with SDS or other supporting documentation for each material used, shall be maintained at the source location and made available for inspection by the Technical Secretary or a Division representative. If new materials are used, or if material formulation is changed, the table shall be updated

within 90 days from the initial date of usage of the new or altered material. The logs shall be maintained in accordance with **Condition G10**.

LOG 1- MONTHLY VOC AND HAP EMISSIONS LOG

Month/Year:								
Emission Source(s):								
Material Name	Usage (gal/month)	Material Density (lb/gal)	VOC Content (lb/gallon)	VOC Emissions (tons/month)	HAP ₁ Content (lb/gal)	HAP ₁ Emissions (tons/month)	HAP _i Content (lb/gal)	HAP _i Emissions (tons/month)
Material ₁								
Material ₂								
Material ₃								
Material _i								
Total								

EQUATIONS FOR THE VOC/HAP EMISSIONS LOG CALCULATIONS:

Material_i VOC Emissions (tons/month of VOC) = Material_i Usage (gpm) * Material_i VOC Content (lb VOC per gallon) ÷ (2000 lb/ton)

Material_i HAP Emissions (tons/month of HAP) = Material_i Usage (gpm) * Material_i HAP Content (lb HAP per gallon) ÷ (2000 lb/ton)

LOG 2 -12 CONSECUTIVE MONTH VOC AND HAP EMISSIONS LOG

Month/Year	VOC Emissions (tons/month)	VOC Emissions (tons/12 months)	HAP ₁ Emissions (tons/month)	HAP ₁ Emissions (tons/12 months)*	HAP _i Emissions (tons/month)	HAP _i Emissions (tons/12 months)*

Add columns as necessary to include each individual HAP (i = 1, 2, 3...).

* The 12-Month Total Emission value (tons/12 months) is the sum of the VOC (or HAP) emissions in the current month plus the VOC (or HAP) emissions in the 11 preceding months.

- G7.** A report stating the compliance status of this facility with permit **Conditions G5 and G6** shall be submitted by **March 31** of every year. The first report shall be submitted in **2021** and shall cover calendar year 2020. The report shall include the records required by **Condition G6** and shall be submitted to the Environmental Field Office manager at the following address:

Tennessee Division of Air Pollution Control
Knoxville Environmental Field Office
3711 Middlebrook Pike
Knoxville, TN 37921
APC.KnoxEFO@tn.gov

OR Adobe Portable Document Format (PDF)
Copy to **APC.KnoxEFO@tn.gov**

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

G8. Visible and Fugitive Emissions

- A. Visible emissions from 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)

- B. 1) No person shall 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:
- (a) 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;
 - (b) Application of asphalt, water, or suitable chemicals on dirt roads, material stockpiles, and other surfaces which can create airborne dusts;
 - (c) 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.
- 2) No person shall cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five minutes per hour or 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 TAPCR 1200-03-20. Fugitive emissions from this source shall be determined by Tennessee Visible Emissions Evaluation Method 4 as adopted by the Tennessee Air Pollution Control Board on April 16, 1986.

TAPCR 1200-03-08-.01(1) and 1200-03-08-.01(2)

- C. Visible emissions from roads and parking areas shall not exhibit greater than 10% opacity utilizing Tennessee Visible Emissions Evaluation (TVEE) Method 1, as adopted by the Tennessee Air Pollution Control Board on April 29, 1982, as amended on September 15, 1982 and August 24, 1984.

TAPCR 1200-03-08-.03

G9. Routine Maintenance Requirements

The permittee shall maintain and repair the emission source, associated air pollution control device(s), and compliance assurance monitoring equipment as required to maintain and assure compliance with the specified emission limits.

TAPCR 1200-03-09-.03(8)

Compliance Method: Records of all repair and maintenance activities required above shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than five years. The date each maintenance and repair activity began shall be entered in the log no later than seven days following the start of the repair or maintenance activity, and the completion date shall be entered in the log no later than seven days from activity completion.

G10. General Recordkeeping Requirements

A. The following recordkeeping requirements shall apply to this facility:

- 1) 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.
- 2) 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.
- 3) 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.

- 4) All maintenance activities required by **Condition G9** (including any ongoing maintenance that has not been completed) shall be entered in the maintenance log no later than 30 days following the start of the maintenance.

- B. Logs and records specified in this permit shall be kept readily available/accessible and 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 are based on a recommended format. Any logs that have an alternative format may be utilized provided such logs contain the same or equivalent information that is required. Computer-generated logs are also acceptable.

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

G11. Other State and Federal Regulations

This source shall comply with all applicable state and federal air pollution regulations. This includes, but is not limited to, all applicable provisions of the Tennessee Air Pollution Control Regulations, federal regulations published under 40 CFR 61 and 40 CFR 63 for sources of hazardous air pollutants, and federal regulations published under 40 CFR 60, New Source Performance Standards.

TAPCR 1200-03-09-.03(8)

G12. Startup, Shutdown, and Malfunction Requirements

- A. The facility must take all reasonable measures to keep emissions to a minimum during source 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.

TAPCR 1200-03-20-.02(1)

- B. **Monitoring Systems:** Due allowance for failure to monitor shall be made during any period of monitoring system malfunction, provided that the source owner or operator shows, to the satisfaction of the Technical Secretary, that the malfunction was unavoidable and is being repaired as expeditiously as practicable, and that a log of all such malfunctions is being kept by the owner or operator, including the time the malfunction began, when it was detected, what was wrong, what was done to correct the malfunction, and when the malfunction was corrected. Failures that are caused by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

TAPCR 1200-03-10-.02(e)

G13. Application and Agreement Letters

This source shall operate in accordance with the terms of this permit, the information submitted in the approved permit application referenced in **Condition G1**, and any documented agreements made with the Technical Secretary.

TAPCR 1200-03-09-.01(1)(d) and 1200-03-09-.02(6)

G14. Permit Transference

- A. This permit is not transferable from one air contaminant source to another air contaminant source or from one location to another location.

TAPCR 1200-03-09-.03(6)(b)

- B. In the event an ownership change occurs at this facility, written notification of the ownership change requesting a permit amendment must be submitted to the Technical Secretary no later than 30 days after the change occurs. This notification must include an agreement to abide by the terms of the permit, Division 1200-03 and Division 0400-30 of the Tennessee Air Pollution Control Regulations, the Tennessee Air Quality Act, and any documented agreements made by the previous owner to the Technical Secretary.

TAPCR 1200-03-09-.03(6)(a)

G15. Operating Permit Application Submittal

The permittee shall apply for renewal of this permit not less than 60 days prior to the permit expiration date. The renewal application shall be delivered to the Division at the address listed below or in Adobe Portable Document Format via e-mail.

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

Email the information in Adobe Portable
 Document format (PDF):
 Air.Pollution.Control@TN.gov

TAPCR 1200-03-09-.02(1) and 1200-03-09-.02(3)

- G16.** Operation of each air contaminant source shall be in accordance with the provisions and stipulations set forth in the operating permit, all provisions of the Tennessee Division of Air Pollution Control, and all provisions of the Tennessee Air Quality Act.

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

- G17** The issuance of this permit supersedes all previously issued permit(s) for this air contaminant source.

TAPCR 1200-03-09-.03(6)

G18. Fees

This source shall comply with the requirements for payment of applicable annual emission fees and conditional major review fees to the Tennessee Division of Air Pollution Control based on the Administrative Fees Schedule detailed in Chapter 1200-03-26 of the Tennessee Air Pollution Control Regulations.

TAPCR 1200-03-26-.02

- G19.** The facility is placed on notice that spray-applied coating operations at an area source of HAP that utilize coatings that contain compounds of any target HAP, defined in 40 CFR §63.11180 as chromium, lead, manganese, nickel, or cadmium, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in 40 CFR §63.11180, are subject to 40 CFR Part 63, Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface

Coating Operations at Area Sources. The SDSs for the coatings declared for use at the time of application did not indicate the presence of any target HAP. Use of a spray-applied coating that contains compounds of one or more target HAP will subject the facility to all applicable requirements of Subpart HHHHHH, including the initial notification requirements of §63.11175. Additionally, the facility must apply for and receive a construction permit pursuant to TAPCR 1200-03-09-.01(1) prior to use of the coatings.

SECTION II: SOURCE SPECIFIC CONDITIONS.

Source Description: **Surface Coating Operations**

65-0044-01: 14 Tumbler Coating Sprayers for coating metal and rubber parts, with associated curing oven (insignificant activity); and two dip tanks

65-0044-02: Two Centrifugal Coating Machines for coating metal stampings and other metal parts

65-0044-03: Two Hand Spray Booths for coating metal and rubber parts with exhaust filter control and associated curing oven (insignificant activity)

- S1-1.** Particulate Matter (PM) emitted from the sources listed below shall not exceed 0.02 grains per dry standard cubic foot of exhaust gas.

Emission Source	Source Description	Equivalent Emission Limit (pounds per hour, on a daily average basis)	Control Device
65-0044-01	14 Coating Sprayers	0.81	
65-0044-02	Two Centrifugal Coating Machines	2.89	n/a
65-0044-03	Two Hand Spray Booths	2.90	Exhaust filters

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

Compliance Method: Compliance with this emission limitation is assured by compliance with **Condition G9**.

- S1-2.** Emissions of VOC from these sources shall not exceed the facility-wide emission limit specified in **Condition G5**.

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

Compliance Method: Compliance with the facility-wide VOC emission limitation is demonstrated by the recordkeeping required by **Condition G6**.

- S1-3.** Emissions of individual and combined HAP from these sources shall not exceed the facility-wide emission limits specified in **Condition G6**.

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

Compliance Method: Compliance with the facility-wide HAP emission limitations is demonstrated by the recordkeeping required by **Condition G6**.

65-0044-06 Source Description: Thermal Spraying Operation

Two Thermal Spray Booths that use either high velocity oxygen fuel (HVOF) or plasma spray guns with a high efficiency cyclone and a cartridge collector baghouse in series for emission control

This source is subject to 40 CFR 63: Subpart WWWWWW

- S6-1.** PM emitted from this source shall not exceed 0.02 grains per dry standard cubic foot of exhaust gas (2.06 pounds per hour, on a daily average basis).

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

Compliance Methods:

Cyclone: The permittee shall inspect the high efficiency cyclone on a weekly basis (calendar week), when the source is in operation, for corrosion, erosion, abrasion, or any other damage that could result in air leakage. Maintenance and inspection records (inspection of the cyclone, cleaning systems, collection hoppers, conveying system, etc.) shall be recorded in a suitable permanent form 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. All maintenance activities (including any ongoing maintenance that has not been completed) shall be entered in the maintenance log no later than seven days following the start of the maintenance.

Baghouse: Within 10 days of issuance of this conditional major operating permit, the permittee shall begin taking daily pressure drop readings for the cartridge collector baghouse. Sixty days of pressure drop (inches of water column) readings for the baghouse shall be compiled. The designated person(s) shall note any relevant baghouse conditions/problems/concerns when recording the values. This data shall be submitted to the Division to the address in Condition **G15**, along with a proposed minimum pressure drop for the baghouse, no later than 15 days following the 60 days of readings. The minimum pressure drop value for compliance assurance will be incorporated into this permit through a permit amendment.

After incorporation of the minimum pressure drop into the permit, compliance with the above specified particulate emission limit shall be assured by maintaining the required minimum pressure drop for the baghouse. The pressure drop for the baghouse shall be recorded once daily when the source is in operation. Days when the source is not operating shall be noted. The pressure drop values shall be recorded in a suitable permanent form 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.

- S6-2.** This emission source is subject to and shall comply with all applicable requirements of 40 CFR 63, Subpart WWWWWW – *National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing*. The applicable requirements of Subpart WWWWWW are incorporated into this permit pursuant to TAPCR 1200-03-09-.03(8).

- S6-3.** The permittee must meet the applicable requirements specified in (a) through (c) of this condition for any affected thermal spraying operation that applies one or more of the plating and polishing metal HAP.

- (a) For new permanent thermal spraying operations, operate a capture system that collects PM emissions from the thermal spraying process and transports the emissions to a fabric, cartridge, or HEPA filter.
- (b) Operate all capture and control devices according to the manufacturer's specifications and instructions.
- (c) Keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

40 CFR §63.11507(f)

S6-4. The permittee must implement the applicable management practices specified in (a) through (l) of this condition, as practicable, for any affected new or existing plating and polishing process unit that contains, applies, or emits one or more of the plating and polishing metal HAP.

- (a) Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.
- (b) Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable.
- (c) Optimize the design of barrels, racks, and parts to minimize drag out of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable.
- (d) Use tank covers, if already owned and available at the facility, whenever practicable.
- (e) Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).
- (f) Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.
- (g) Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable.
- (h) Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.
- (i) Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.
- (j) Minimize spills and overflow of tanks, as practicable.
- (k) Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.
- (l) Perform regular inspections to identify leaks and other opportunities for pollution prevention.

40 CFR §63.11507(g)

S6-5. The permittee must demonstrate continuous compliance with the applicable management practices and standards specified in **Conditions S6-3 and S6-4** by satisfying the requirements in (a) through (d) of this condition.

- (a) The permittee must always operate and maintain the affected source, including air pollution control equipment.
- (b) The permittee must prepare an annual compliance certification according to the requirements specified in **Condition S6-6** and keep it in a readily-accessible location for inspection by the Technical Secretary or a Division representative.
- (c) The permittee must implement the applicable management practices during all times that the affected process is in operation.
- (d) The permittee must state in the annual compliance certification that the applicable management practices have been implemented, as practicable.

40 CFR §63.11508(d)(1), (2), and (8)

S6-6. The permittee must prepare an annual certification of compliance report. These reports do not need to be submitted unless a deviation from the requirements has occurred during the reporting year, in which case, the annual compliance report must be submitted along with the deviation report. Pursuant to 40 CFR §63.11509(c)(2), the permittee must state in the annual certification that the control system has been operated and maintained according to the manufacturer's specifications and instructions.

40 CFR §63.11509(c)

Compliance Method: Per §63.11509(c)(7), each annual compliance report must be prepared no later than January 31 of the year immediately following the reporting period and kept in a readily-accessible location for inspection by the Technical Secretary or a Division representative. If a deviation has occurred during the year, each annual compliance report must be submitted along with the deviation report and postmarked or delivered no later than January 31 of the year immediately following the reporting period. Annual compliance reports shall be submitted to the Permit Section at the address specified in **Condition G15**.

S6-7. If any deviations from the compliance requirements specified in Subpart WWWWWW occurred during the year, the permittee must report the deviations, along with the corrective action taken, and submit this report with the annual certification of compliance report required by **Condition S6-6**.

40 CFR §63.11509(d)

S6-8. The permittee must keep the records specified in (a) through (c) of this condition.

- (a) A copy of any Initial Notification and Notification of Compliance Status submitted, and all documentation supporting those notifications.
- (b) The records specified in 40 CFR §63.10(b)(2)(i) through (iii) and (xiv) of the General Provisions of 40 CFR Part 63.
- (c) The records required to show continuous compliance with each management practice and equipment standard that applies, as specified in **Conditions S6-3 and S6-4**.

40 CFR §63.11509(e)

Compliance Method: Per §63.11509(f), the permittee must keep each record for a minimum of five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Records must be kept onsite for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1) of the General Provisions to 40 CFR Part 63. Records may be kept offsite for the remaining three years.

(end of conditions)

The permit application gives the location of this source as 36 06 16.68N Latitude and 84.34 43.36W Longitude.