PUBLIC NOTICE

The Carlstar Group, LLC. has applied to the Tennessee Air Pollution Control Division (TAPCD) for a significant modification to an existing major source (Title V) operating permit 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). A major source (Title V) operating permit is required by both the Federal Clean Air Act and the Tennessee Air Pollution Control Regulations.

The Carlstar Group, LLC. has applied for a significant modification for significant changes to monitoring, recordkeeping, and reporting to an existing operating permit. The Title V operating permit subject to the modification is identified as follow: Division identification number 01-0114/572478. The portions of the Title V permit affected by this modification are as follows: Condition E3-3 (VOC and HAP-containing materials), Condition E3-6 (facility-wide VOC recordkeeping), Condition E3-7 (facility-wide HAP recordkeeping), and Condition E6-8 (Source 05 boilers emissions). This significant modification is conducted pursuant to the Tennessee Air Pollution Control Regulations 1200-03-09-.02(11)(f)(iv). Only the portion of the Title V permit affected by the significant modification is open to comment during the notice period.

The Environmental Protection Agency (EPA) has agreed to treat this draft Part 70 permit as a proposed Part 70 permit renewal 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. 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. Whether EPA’s 45-day review period is performed concurrently with the public comment period or after the public comment period has ended, the deadline for citizen’s petitions to the EPA Administrator will be determined as if EPA’s 45-day review period is performed after the public comment period has ended (i.e., sequentially).

The status regarding EPA’s 45-day review of this project and the deadline for submitting a citizen's petition can be found at the following website address:

http://www2.epa.gov/cca-permitting/cca-permitting-epas-southeastern-region

A copy of the application materials used by the TAPCD and a copy of the draft permit are available for public inspection during normal business hours at the following locations:

Clinton Public Library
118 S. Hicks Street
Clinton, TN 37716

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

Also, if you require a copy of the draft / proposed permit it is available electronically by accessing the Air Pollution Control Public Participation Opportunity (APC PPO) page: http://www.tn.gov/environment/topic/ppo-air

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 made within thirty (30) days of the date of this notice and should be addressed to Ms. Michelle Walker Owenby, Director, Air Pollution Control Division, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, 15th Floor, Nashville, Tennessee 37243. Questions concerning the source(s) may be addressed to Ms. Chelsea Meadows at the same address or by calling (615)-532-0558 or via e-mail at Chelsea.Meadows@tn.gov. A final determination will be made after weighing all relevant comments.

Individuals with disabilities who wish to participate in these proceedings (or to review these filings) should contact the Tennessee Department of Environment and Conservation to discuss any auxiliary aids or services needed to facilitate such participation. 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 thirty (30) day public comment period to allow time to provide such aid or services.

Do not publish text below dotted line.

For the Anderson County “Oak Ridger” publish once between July 26th and August 2nd, 2019

Air Pollution Control

Assigned to – Chelsea Meadows

No alterations to the above are allowed:

The Carlstar Group, LLC. must pay to place this advertisement in the newspaper. Air Pollution Control Division 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 Chelsea Meadows, Air Pollution Control Division, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, 15th Floor, Nashville, Tennessee 37243 or send a PDF copy of the same information electronically, to Air.Pollution.Control@TN.gov.
Addendum #1 to
TITLE V PERMIT STATEMENT

<table>
<thead>
<tr>
<th>Facility Name: The Carlstar Group, LLC</th>
</tr>
</thead>
<tbody>
<tr>
<td>City: Clinton</td>
</tr>
<tr>
<td>County: Anderson</td>
</tr>
<tr>
<td>Date Application Deemed Complete: February 2, 2017</td>
</tr>
<tr>
<td>Emission Source Reference No.: 01-0114</td>
</tr>
<tr>
<td>Permit No.: 572478</td>
</tr>
</tbody>
</table>

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 1200-3-9-.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 The Carlstar Group, LLC 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
   The Carlstar Group, LLC manufactures rubber non-road tires.

Emission Sources:
   01: Rubber Processing – Three processing lines. One “hot” feed line beginning with four warming mills, one “cold” feed line that does not require milling before extrusion, and one radial tire manufacturing line. Includes undertread, sidewall, and tread end cementing. Line #3, along with eight tire curing presses, was originally Source 09 but was incorporated into this source and Source 04.
   04: Tire Building – Tire curing presses and green tire spraying. The tire curing presses from previous Source 09 were incorporated into this source.
   05: Two Boilers – One 95 MMBtu/hr boiler (subject to NSPS Subpart Dc and NESHAP Subpart 6J) and one 92.27 MMBtu/hr boiler (subject to NSPS Subpart Dc) used to provide steam for the facility. The two boilers do not operate simultaneously and no fuel is needed to keep the back-up boiler ready.
   07: Raw Material Handling – Carbon black unloading and bulk bag unloading.
   08: Rubber Mixing – Conveyor feeding raw materials into two Banbury mixers.
   10: Emergency Generator Engine – One 64 hp diesel fired emergency reciprocating internal combustion engine (RICE). (Insignificant)
   11: Emergency Fire Pump Engine – One 218 hp diesel fired emergency fire pump engine. (Insignificant)
   14: Gasoline Dispensing – One 500 gallon gasoline storage tank for dispensing gasoline to onsite gasoline-fueled equipment. (Insignificant)

B. Facility Classification
   1. Attainment or Non-Attainment Area Location
      Area (is) designated as an attainment area for all criteria pollutants.
   2. Company is located in a Class II area.
C. Regulatory Status

1. PSD/NSR

This facility is considered a major source for **PSD** purposes.

2. Title V Major Source Status by Pollutant

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Is the pollutant emitted?</th>
<th>If emitted, what is the facility’s status?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Major Source Status</td>
</tr>
<tr>
<td>PM</td>
<td>yes</td>
<td>yes</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>SO$_2$</td>
<td>yes</td>
<td>yes</td>
</tr>
<tr>
<td>VOC</td>
<td>yes</td>
<td>yes</td>
</tr>
<tr>
<td>NO$_x$</td>
<td>yes</td>
<td>yes</td>
</tr>
<tr>
<td>CO</td>
<td>yes</td>
<td>yes</td>
</tr>
<tr>
<td>Individual HAP</td>
<td>yes</td>
<td>yes</td>
</tr>
<tr>
<td>Total HAPs</td>
<td>yes</td>
<td>yes</td>
</tr>
<tr>
<td>GHG (CO$_2$e)</td>
<td>yes</td>
<td>yes</td>
</tr>
</tbody>
</table>

3. MACT Standards

List MACT Rule(s) if applicable:

This facility is not a major source for HAPs.

4. Program Applicability

Are the following programs applicable to the facility?

PSD (**yes**) – The facility is a major source for VOC under PSD.

NESHAP (**no**) - This facility is not major for HAPs and therefore not subject to 40 CFR 63 Subpart XXXX - **National Emissions Standards For Hazardous Air Pollutants: Rubber Tire Manufacturing**.

NESHAP (**yes**) Source 05 – This facility is an area source for HAPs and one of the boilers is subject to 40 CFR 63 Subpart JJJJJ – **National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources**

NESHAP (**yes**) Sources 10 and 11 – 40 CFR 63 Subpart ZZZZ – **National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

NSPS (yes) Source 05 – 40 CFR Part 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

NSPS (yes) Sources 01 and 04 (Lines 2 and 3) – 40 CFR Part 60 Subpart BBB – Standards of Performance for the Rubber Tire Manufacturing Industry. Line 1 predates the NSPS applicability.

5. Other Standards

40 CFR 64 - Compliance Assurance Monitoring – Source 08 of this facility is subject to CAM for PM emissions An updated CAM plan was submitted with the renewal of this Title V operating permit to allow the use of pressure drop monitoring in place of a leak detection system for Source 08. This update was incorporated into the renewal.

II. Compliance Information

A. Compliance Status

Is the facility currently in compliance with all applicable requirements? (yes)
If no, explain.

Are there any applicable requirements that will become effective during the permit term? (yes)
If yes, explain.

The updated CAM plan will require the monitoring of pressure drop in place of use of the leak detection system for Source 08.

III. Other Requirements

A. Emissions Trading

The facility is not involved in an emission trading program.

B. Acid Rain Requirements

This facility is not subject to any requirements in Title IV of the Clean Air Act.

C. Prevention of Accidental Releases

(Not Applicable)

IV. Public Participation Procedures

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

1. EPA
2. Knox County
3. State of Kentucky
4. State of North Carolina
5. State of Virginia
6. Cherokee Nation

V. Permit History:

Title V Operating Permit No. 572478 represents the second renewal of the original Title V Permit No. 556837 issued April 23, 2004. The following changes have occurred since the first Title V renewal Permit No. 562998 issued August 14, 2012.


Minor modification #2: Issued December 8, 2015 - The facility is replacing its existing carbon black transporter baghouse with a smaller baghouse (650cfm) which will be located indoors. Installed a new bulk bag unloading station controlled by another baghouse (600 cfm). The two installed baghouses replaces the older bigger one. Removal of day bins and direct pneumatic transfer to silos eliminated the need of a bigger baghouse. This change makes Source 07 no longer subject to CAM, but due to the company’s request to modify the permit with a minor modification rather than a significant modification the permit will continue to have a CAM plan for Source 07 until renewal.

Minor Modification #3: Issued March 28, 2016 - Added clarification of NSPS compliance methods so that there are three compliance methods for the tire sprays. One, for sprays that are water based and have less than 1% VOC content. Two, for tire sprays that are water based and have more than 1% VOC content. Three, for tire sprays that are solvent based.

Operational Flexibility #2: Issued July 31, 2017 – Addition of an exhaust hood over the mixing bins tied into the existing stack.

Minor Modification #4: Issued January 30, 2018 – Replacement of a natural gas fired boiler (Source 05)

Permit No. 572478

Operational Flexibility #1: Issued August 29, 2018 – Addition of a third spray booth to the tire building lines (Source 04) for spraying lubricant on green tires. There will no additional material used and the booth exhaust will be routed into existing ducting so there will not be any additional air flow.
**Significant Modification #1:** Draft – Removal of the facility’s PAL permit. The facility-wide limit from the PAL will remain the same. Volatile organic compound (VOC) emissions records that were part of the PAL were added to Condition E3-7, and tables in source-specific sections of the permit were either added or modified to account for record keeping that was being done in the PAL permit.
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. 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: July 9, 2018

Date of Significant Modification #1: DRAFT

Date Expires: July 9, 2023

Issued To: The Carlstar Group, LLC

Installation Address: 520 J. D. Yarnell Industrial Parkway

Clinton, TN 37716

Installation Description: Rubber Tire Manufacturer

01: Rubber Processing
04: Tire Building
05: Two Boilers using natural gas and #2 fuel oil
07: Raw Material Handling.
08: Rubber Mixing

Emission Source Reference No.: 01-0114

Renewal Application Due Date:
Between October 12, 2022 and January 10, 2023

Primary SIC: 3011

Information Relied Upon:
Previous Title V Permit 562998
Permit application dated January 31, 2017
Supplemental information October 16, 2017
Significant Modification Application dated May 30, 2018

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
CONTENTS

SECTION A
GENERAL PERMIT CONDITIONS

A1. Definitions
A2. Compliance requirement
A3. Need to halt or reduce activity
A4. The permit
A5. Property rights
A6. Submittal of requested information
A7. Severability clause
A8. Fee payment
A9. Permit revision not required
A10. Inspection and entry
A11. Permit shield
A12. Permit renewal and expiration
A13. Reopening for cause
A14. Permit transference
A15. Air pollution alert
A16. Construction permit required
A17. Notification of changes
A18. Schedule of compliance
A19. Title VI
A20. 112 (r)

SECTION B
GENERAL CONDITIONS for MONITORING, REPORTING, and ENFORCEMENT

B1. Recordkeeping
B2. Retention of monitoring data
B3. Reporting
B4. Certification
B5. Annual compliance certification
B6. Submission of compliance certification
B7. Emergency provisions
B8. Excess emissions reporting
B9. Malfunctions, startups and shutdowns - reasonable measures required
B10. (RESERVED)
B11. Report required upon the issuance of a notice of violation for excess emissions
CONTENTS

SECTION C
PERMIT CHANGES

C1. Operational flexibility changes 9
C2. Section 502(b)(10) changes 9
C3. Administrative amendment 9
C4. Minor permit modifications 10
C5. Significant permit modifications 10
C6. New construction or modifications 10

SECTION D
GENERAL APPLICABLE REQUIREMENTS

D1. Visible emissions 11
D2. General provisions and applicability for non-process gaseous emissions 11
D3. Non-process emission standards 11
D4. General provisions and applicability for process gaseous emissions 11
D5. Particulate emissions from process emission sources 11
D6. Sulfur dioxide emission standards 11
D7. Fugitive dust 11
D8. Open burning 12
D9. Asbestos 12
D10. Annual certification of compliance 12
D11. Emission Standards for Hazardous Air Pollutants 12
D12. Standards of Performance for New Stationary Sources 12
D13. Gasoline Dispensing 12
CONTENTS

SECTION E
SOURCE SPECIFIC EMISSION STANDARDS, OPERATING LIMITATIONS, and MONITORING, RECORDKEEPING and REPORTING REQUIREMENTS

E1. Fees 13
E2. Reporting Requirements 15
E3. General Requirements 16
E4. 01-0114-01: Rubber Processing 19
E5. 01-0114-04: Tire Building 22
E6. 01-0114-05: Two Boilers 24
E7. 01-0114-07: Raw Material Handling 29
E8. 01-0114-08: Rubber Mixing 30

END OF PERMIT 572478 31

ATTACHMENT 1 Opacity Matrix Decision Tree for Visible Emission Evaluation by EPA Method 9, Dated June 18, 1996, Amended September 11, 2013 1 page

ATTACHMENT 2 Compliance Assurance Monitoring Plan 8 pages
SECTION A

GENERAL PERMIT CONDITIONS

A permit issued under the provisions of Tennessee Comprehensive Rules and Regulations (Tenn. Comp. R. & Regs.) 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\(^1\), Part 70.

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

Tenn. Comp. R. & Regs. Division 1200-03

A2. **Compliance requirement.** All terms and conditions in a permit issued pursuant to Tenn. Comp. R. & Regs. 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 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.

Tenn. Comp. R. & Regs. subpart 1200-03-09-.02(11)(e)2(i) and item 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.

Tenn. Comp. R. & Regs. item 1200-03-09-.02(11)(e)1(vi)(I)

A4. **The permit.** The permit may be modified, revoked, reopened, 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.

Tenn. Comp. R. & Regs. item 1200-03-09-.02(11)(e)1(vi)(II)

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

Tenn. Comp. R. & Regs. item 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.

Tenn. Comp. R. & Regs. item 1200-03-09-.02(11)(e)1(vi)(V)

\(^1\) CFR = Code of Federal Regulations
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.

Tenn. Comp. R. & Regs. subpart 1200-03-09.02(11)(e)1(v)

A8. **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 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) New 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. Thenceforth, the permittee shall pay 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. If a source does not declare an annual accounting period or fee basis the default annual accounting period is a calendar year and the default fee basis is the allowable emissions basis.

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

1. Major stationary sources choosing to pay annual emission fees on an allowable emissions basis shall pay one hundred percent (100%) of the fee due:
   
   (i) No later than March 31 of the year immediately following the annual accounting period for which the fee is due for major stationary sources paying on a calendar year basis pursuant to subparagraph (b) of this paragraph; or
   
   (ii) No later than March 31 of the current fiscal year for major stationary sources paying on a fiscal year basis.

2. Major stationary sources choosing to pay annual emission fees on an actual emissions basis or a combination of actual and allowable emissions basis, and on a calendar year basis, shall pay one hundred percent (100%) of the fee due no later than April 1 of the year immediately following the annual accounting period for which the fee is due, except as allowed by part 3 of Tenn. Comp. R. & Regs. subparagraph 1200-03-26-.02(9)(g).

3. Major stationary sources choosing to pay annual emission fees on an actual emissions basis or a combination of actual and allowable emissions basis and on a fiscal year basis shall pay an estimated sixty-five percent (65%) of the fee due pursuant to subparagraph (d) of Tenn. Comp. R. & Regs. paragraph 1200-03-26-.02(9) no later than April 1 of the current fiscal year. The remainder of the annual emission fee is due July 1 of each year, except as allowed by part 3 of Tenn. Comp. R. & Regs. subparagraph 1200-03-26-.02(9)(g).

(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. Sources subject to the provisions of Tenn. Comp. R. & Regs. 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 Tenn. Comp. R. & Regs. 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 PM$_{10}$ shall not be placed in either the regulated HAP category or miscellaneous HAP category.

4. Sources that are subject to a provision of Tenn. Comp. R. & Regs. Chapter 1200-03-16 New Source Performance Standards (NSPS), Tenn. Comp. R. & Regs. 0400-30-39 Standards of Performance for New Stationary Sources, or 40 CFR 60 for pollutants that are neither particulate matter, PM$_{10}$, sulfur dioxide (SO$_2$), 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 Tenn. Comp. R. & Regs. subpart 1200-03-26-.02(2)(i).

6. Sources that wish to pay annual emission fees for PM$_{10}$ on an allowable emission basis may do so if they have a specific PM$_{10}$ allowable emission standard. If a source has a total particulate emission standard, but wishes to pay annual emission fees on an actual PM$_{10}$ emission basis, it may do so if the PM$_{10}$ actual emission levels are proven to the satisfaction of the Technical Secretary. The method to demonstrate the actual PM$_{10}$ emission levels...
must be made as part of the source’s Title V operating permit in advance in order to exercise this option. The PM\textsubscript{10} emissions reported under these options shall not be subject to fees under the family of particulate emissions. The 4,000 ton cap provisions of Tenn. Comp. R. & Regs. subpart 1200-03-26-.02(2)(i) shall also apply to PM\textsubscript{10} emissions.

Tenn. Comp. R. & Regs. Rule 1200-03-26-.02 and subpart 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.

Tenn. Comp. R. & Regs. subpart 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 Tenn. Comp. R. & Regs. Chapter 1200-03-10, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

"Reasonable times" shall be considered to be customary business hours unless reasonable cause exists to suspect noncompliance with the Clean Air Act, Tenn. Comp. R. & Regs. 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.

Tenn. Comp. R. & Regs. subpart 1200-03-09-.02(11)(e)3.(ii)

A11. **Permit shield.** 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.

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. \textsuperscript{2} §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.

Permit shield is granted to the permittee.

Tenn. Comp. R. & Regs. part 1200-03-09-.02(11)(e)6

A12. **Permit renewal and expiration.** 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.

Provided that 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 Tenn. Comp. R. & Regs. Paragraph 1200-03-09-.02(11).

\textsuperscript{2} T.C.A. = Tennessee Code Annotated
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.

Tenn. Comp. R. & Regs. parts 1200-03-09-.02(11)(f)2 and 3, item 1200-03-09-.02(11)(d)1(i)(III), and part 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 Tenn. Comp. R. & Regs. part 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 condition 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.

Tenn. Comp. R. & Regs. parts 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 Tenn. Comp. R. & Regs. Paragraph 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.

Expiration Date: July 9, 2023
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 Tenn. Comp. R. & Regs. Paragraph 1200-03-09-.03(1) and Rule 1200-03-15-.03.

A16. **Construction permit required.** Except as exempted in Tenn. Comp. R. & Regs. Rule 1200-03-09-.04, or excluded in Tenn. Comp. R. & Regs. subparagraph 1200-03-02-.01(1)(aa) or subparagraph 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.

Tenn. Comp. R. & Regs. subparagraph 1200-03-09-.01(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.

Tenn. Comp. R. & Regs. Paragraph 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.

Tenn. Comp. R. & Regs. part 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.

Tenn. Comp. R. & Regs. Paragraph 1200-03-09-.03(8)

A20. **112(r).** The permittee shall comply with the requirement to submit to the Administrator or designated State Agency a risk management plan, including a registration that reflects all covered processes, by June 21, 1999, if the permittee's facility is required pursuant to 40 CFR, 68, to submit such a plan.

Tenn. Comp. R. & Regs. Paragraph 1200-03-09-.03(8)
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.

Tenn. Comp. R. & Regs. subpart 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.

Tenn. Comp. R. & Regs. subitem 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.

Tenn. Comp. R. & Regs. subpart 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.

Tenn. Comp. R. & Regs. part 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 Tenn. Comp. R. & Regs. Paragraph 1200-03-09-.02(11), 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. 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 and Toxics Branch US EPA Region IV 61 Forsyth Street, SW Atlanta, Georgia 30303 |

Tenn. Comp. R. & Regs. item 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 Tenn. Comp. R. & Regs. Rule 1200-03-20-.03. For the purposes of this condition, "emergency" shall be substituted for "malfunction(s)" in Tenn. Comp. R. & Regs. 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 Tenn. Comp. R. & Regs. Division 1200-03 or other applicable requirement.

Tenn. Comp. R. & Regs. part 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 Tenn. Comp. R. & Regs. Division 1200-03 or any permit issued thereo, 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 Tenn. Comp. R. & Regs. 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.

Tenn. Comp. R. & Regs. Rules 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).

Tenn. Comp. R. & Regs. Rule 1200-03-20-.02

B10. Reserved.

B11. 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.

Tenn. Comp. R. & Regs. Paragraphs 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 Tenn. Comp. R. & Regs. Chapter 1200-03-30.

(b) The change cannot be a modification under any provision of Title I of the federal Act or Tenn. Comp. R. & Regs. 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 Tenn. Comp. R. & Regs. 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 Tenn. Comp. R. & Regs. 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.

Tenn. Comp. R. & Regs. subpart 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 Tenn. Comp. R. & Regs. 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 Tenn. Comp. R. & Regs. part 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 Tenn. Comp. R. & Regs. part 1200-03-09-.02(11)(e)6 shall not apply to Section 502(b)(10) changes.

Tenn. Comp. R. & Regs. subpart 1200-03-09-.02(11)(a)4(i)

C3. **Administrative amendment.**

(a) Administrative permit amendments to this permit shall be in accordance with Tenn. Comp. R. & Regs. part 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 Tenn. Comp. R. & Regs. part 1200-03-09-.02(11)(e)6 for such revisions made pursuant to item (c) of this condition which meet the relevant requirements of Tenn. Comp. R. & Regs. subparagraph 1200-03-09-.02(11)(e), subparagraph 1200-03-09-.02(11)(f), and subparagraph 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.

Tenn. Comp. R. & Regs. part 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 Tenn. Comp. R. & Regs. subpart 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.

   Tenn. Comp. R. & Regs. subpart 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 Tenn. Comp. R. & Regs. subpart 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.

   Tenn. Comp. R. & Regs. subpart 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 Tenn. Comp. R. & Regs. Rule 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 Tenn. Comp. R. & Regs. part 1200-03-09-.02(11)(f)4 or the significant modification route of Tenn. Comp. R. & Regs. subpart 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 Tenn. Comp. R. & Regs. subpart 1200-03-09-.02(11)(f)5(ii) or group processing of minor modifications under the provisions of Tenn. Comp. R. & Regs. subpart 1200-03-09-.02(11)(f)5(iii) as applicable to the magnitude of their construction.

   Tenn. Comp. R. & Regs. item 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 Tenn. Comp. R. & Regs. 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 Tenn. Comp. R. & Regs. Chapter 1200-03-20, due allowance may be made for visible emissions in excess of that permitted under Tenn. Comp. R. & Regs. Chapter 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.

Tenn. Comp. R. & Regs. Paragraphs 1200-03-05-.01(1), 1200-03-05-.03(6) and 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.

Tenn. Comp. R. & Regs. Paragraph 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 Tenn. Comp. R. & Regs. Chapter 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.

Tenn. Comp. R. & Regs. Paragraph 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 Tenn. Comp. R. & Regs. Chapter 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 Tenn. Comp. R. & Regs. Chapter 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. 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, oil, 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 Tenn. Comp. R. & Regs. Chapter 1200-03-20.

Tenn. Comp. R. & Regs. Chapter 1200-03-08

D8. Open burning. The permittee shall comply with the Tenn. Comp. R. & Regs. 1200-03-04 for all open burning activities at the facility.

Tenn. Comp. R. & Regs. Chapter 1200-03-04

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

Tenn. Comp. R. & Regs. subparagraph 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 Tenn. Comp. R. & Regs. 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)1 and compliance requirements of Tenn. Comp. R. & Regs. 1200-03-09-.02(11)(e)3.(i). The permittee shall submit compliance certification for these conditions annually.

D11. Emission Standards for Hazardous Air Pollutants. Where applicable, the permittee shall comply with the Tenn. Comp. R. & Regs. 0400-30-38 for all emission sources subject to a requirement contained therein.

Tenn. Comp. R. & Regs. Chapter 0400-30-38

D12. Standards of Performance for New Stationary Sources. Where applicable, the permittee shall comply with the Tenn. Comp. R. & Regs. 0400-30-39 for all emission sources subject to a requirement contained therein.

Tenn. Comp. R. & Regs. Chapter 0400-30-39

D13. Gasoline Dispensing Facilities. Where applicable, the permittee shall comply with the Tenn. Comp. R. & Regs. Rule 1200-03-18-.24 for all emission sources subject to a requirement contained therein.
**SECTION E**

**SOURCE SPECIFIC EMISSION STANDARDS, OPERATING LIMITATIONS, and MONITORING, RECORDKEEPING and REPORTING REQUIREMENTS**

E1. Fee payment:

**FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 01-0114**

<table>
<thead>
<tr>
<th>REGULATED POLLUTANTS</th>
<th>ALLOWABLE EMISSIONS (tons per AAP)</th>
<th>ACTUAL EMISSIONS (tons per AAP)</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>PARTICULATE MATTER (PM)</td>
<td>61.40</td>
<td>AEAR</td>
<td>Includes all fee emissions</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>N/A</td>
<td>AEAR</td>
<td>Includes all fee emissions</td>
</tr>
<tr>
<td>SO₂</td>
<td>9.51</td>
<td>AEAR</td>
<td>Includes all fee emissions</td>
</tr>
<tr>
<td>VOC</td>
<td>267.24</td>
<td>AEAR</td>
<td>Includes all fee emissions</td>
</tr>
<tr>
<td>NOₓ</td>
<td>51.58</td>
<td>AEAR</td>
<td>Includes all fee emissions</td>
</tr>
</tbody>
</table>

**CATEGORY OF MISCELLANEOUS HAZARDOUS AIR POLLUTANTS (HAP WITHOUT A STANDARD)***

<table>
<thead>
<tr>
<th>VOC FAMILY GROUP</th>
<th>N/A</th>
<th>AEAR</th>
<th>Fee emissions included in VOC</th>
</tr>
</thead>
<tbody>
<tr>
<td>NON-VOC GASEOUS GROUP</td>
<td>N/A</td>
<td>AEAR</td>
<td></td>
</tr>
<tr>
<td>PM FAMILY GROUP</td>
<td>N/A</td>
<td>AEAR</td>
<td></td>
</tr>
</tbody>
</table>

**CATEGORY OF SPECIFIC HAZARDOUS AIR POLLUTANTS (HAP WITH A STANDARD)**

<table>
<thead>
<tr>
<th>VOC FAMILY GROUP</th>
<th>N/A</th>
<th>N/A</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>NON-VOC GASEOUS GROUP</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>PM FAMILY GROUP</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
</tbody>
</table>

**CATEGORY OF NSPS POLLUTANTS NOT LISTED ABOVE***

| EACH NSPS POLLUTANT NOT LISTED ABOVE | N/A | AEAR | VOC emissions included above. |

**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, 2019** and ends **June 30, 2020** The next Annual Accounting Period begins **July 1, 2020**, and ends **June 30, 2021**, 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, NOₓ and so forth. See Tenn. Comp. R. & Regs. 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).

** 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).

*** 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 NOₓ 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).

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 Tenn. Comp. R. & Regs. 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 Tenn. Comp. R. & Regs. 1200-03-26-.02 is not paid within fifteen (15) days of the due date, penalties shall at once accrue as specified in Tenn. Comp. R. & Regs. 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 Tenn. Comp. R. & Regs. 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 Tenn. Comp. R. & Regs. 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 Tenn. Comp. R. & Regs. 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 Tenn. Comp. R. & Regs. 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 Tenn. Comp. R. & Regs. 1200-03-26-.02 and are dependent on the Responsible Official’s choice of fee basis as described above. If any part of any fee imposed under Tenn. Comp. R. & Regs. 1200-03-26-.02 is not paid within fifteen (15) days of the due date, penalties shall at once accrue as specified in Tenn. Comp. R. & Regs. 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.inventary@tn.gov

E2. **Reporting requirements**

(a) **Semiannual reports.** Semiannual reports shall cover the 6-month periods from October 1 through March 31 and April 1 through September 30, and shall be submitted within 60 days after the end of the 6-month periods. All instances of deviations from permit requirements must be clearly identified in these reports and the reports must be certified by a responsible official.

These semiannual reports shall include:

(1) Reports of any monitoring, recordkeeping and calculated emission rates required by Conditions E3-7, E4-1, E4-2, E4-5, E5-1, E5-2, E5-3, E6-8, E6-16, E7-1, and E8-2 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 E3-2 for all regulated stack emission 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.

Tenn. Comp. R. & Regs. 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, & 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 each term or condition 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.

The certification shall cover the 12-month period from October 1 to September 30, and shall be submitted within 60 days after the 12-month period ends.

These certifications shall be submitted to: **TN APCD and EPA**

<table>
<thead>
<tr>
<th>Technical Secretary</th>
<th>Air Enforcement and Toxics Branch</th>
</tr>
</thead>
<tbody>
<tr>
<td>Division of Air Pollution Control</td>
<td>US EPA Region IV</td>
</tr>
<tr>
<td>Knoxville Environmental Field Office</td>
<td>61 Forsyth Street, SW</td>
</tr>
<tr>
<td>3711 Middlebrook Pike</td>
<td>Atlanta, Georgia 30303</td>
</tr>
</tbody>
</table>

Knoxville, TN 37921

In lieu of submitting a paper copy to the above address for the Knoxville Field Office, an electronic copy (PDF) can also be submitted to the following email address:

**APC.KnoxEFO@tn.gov**

1200-03-09-.02(11) e 1(iii) and 40 CFR 70.6(c)(5)(iii)

**E3. General Conditions**

**E3-1.** Purchase orders or invoices for all volatile organic compound (VOC) and HAP containing materials associated with the permitted processes must be maintained and kept available for inspection by the Technical Secretary or representative. These orders or invoices must be retained for not less than five (5) years. The as-supplied VOC and HAP content of all VOC-and HAP-containing materials used at this facility may be determined by using manufacturer or vendor certification that explicitly lists the VOC or HAP content by weight.

Tenn. Comp. R. & Regs. 1200-03-09
E3-2. Visible emissions from this facility shall not exhibit greater than twenty percent (20%) opacity, except for one (1) six-minute period in any one (1) hour period and for no more than four (4) six-minute periods in any twenty-four (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). Tenn. Comp. R. & Regs. 1200-03-05-.03(6) and Tenn. Comp. R. & Regs. 1200-03-05-.01(1)

Compliance Method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996 updated on September 11, 2013. (Enclosed as Attachment 1).

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.

E3-3 (SM1). The as-supplied VOC and HAP content of all VOC and HAP-containing materials to be used by this facility shall be determined as follows:

All Cements, Adhesives, Thinners, and Solvents - from Safety Data Sheets (SDS) or manufacturer or vendor formulation data which explicitly list the VOC and HAP content by weight.

The results of these determinations shall be compiled in the following tabular format or an alternative format which readily provides the same required information. This table, 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 their representative

<table>
<thead>
<tr>
<th>Process Material Description</th>
<th>Date of Initial Usage</th>
<th>Material Density (lb/gal)</th>
<th>VOC Content (lb/gal)</th>
<th>HAP #1 Content (lb/gal)</th>
<th>HAP #2 Content* (lb/gal)</th>
<th>Solids Content (lb/gal)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material #1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Material #2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Material #3*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*This table may be expanded to include additional materials and/or HAPs as required

Tenn Comp. R. & Regs. 1200-03-09-.03(8) and 1200-03-10-.02(2)(a)

E3-4. Routine maintenance, as required to maintain specified emission limits, shall be performed on the air pollution control device(s). Maintenance records 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.

Tenn. Comp. R. & Regs. 1200-03-09

E3-5. Regarding recordkeeping of logs, the following is applicable:

(a) For sources required to maintain monthly logs:
All data, including all required calculations, must be entered in the log no later than thirty (30) days from the end of the month for which the data is required.

(b) For sources required to maintain weekly logs:
All data, including all required calculations, must be entered in the log no later than seven (7) days from the end of the week for which the data is required.

(c) For sources required to maintain daily logs:
All data, including all required calculations, must be entered into the log no later than seven (7) days from the end of the day for which the data is required.

Tenn. Comp. R. & Regs. 1200-03-10-.02(2)
E3-6 (SM1). Volatile organic compounds (VOC) emitted from this facility shall not exceed 267.24 tons during all intervals of 12 consecutive months.

Tenn. Comp. R. & Regs. 1200-03-07-.07(2)

**Compliance Method:** The permittee shall sum the monthly VOC emissions from the tables referenced below and insignificant activities on a monthly basis and enter the data in the table below or in a similar format within 30 days after the end of the month. In addition, the permittee shall calculate the 12-consecutive month summary using the month just reported plus the previous 11 months.

<table>
<thead>
<tr>
<th>Month/Year</th>
<th>VOC Emissions Table 6 (tons)</th>
<th>VOC Emissions Table 11 (tons)</th>
<th>VOC Emissions Table 13 (tons)</th>
<th>VOC Emissions Table 12b (tons)</th>
<th>Insignificant Sources (tons)</th>
<th>Monthly VOC Emissions (tons)</th>
<th>12-Consecutive Month VOC Emissions (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Month 1/Year</td>
<td>0.085</td>
<td>0.085</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Month 2/Year</td>
<td>Etc.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Notes:
* The tons per 12-consecutive Month value is the sum of the VOC emissions in the 11 months preceding the month just completed plus the VOC emissions in the month just completed. All data, including all required calculations, must be entered in accordance with **Condition E3-5**.

E3-7(SM1). Plantwide emissions of any hazardous air pollutant (HAP) listed in Section 112 of the Federal Clean Air Act shall not exceed 9.9 tons during all intervals of 12 consecutive months. Emissions of any combination of HAPs shall not exceed 24.9 tons during all intervals of 12 consecutive months.

**Compliance Method:** The permittee shall keep records in the following format to show compliance with the above limit.

**MONTHLY TOTAL HAPs EMISSIONS FROM FACILITY (01-0114)**

<table>
<thead>
<tr>
<th>Process</th>
<th>Material processed (lb/mo)</th>
<th>HAP1 Emission Factor (lb HAPs/lb Material Processed)</th>
<th>HAP1 Emitted Tons Per Month</th>
<th>HAP1 Emissions (tons per 12 consecutive months)*</th>
<th>HAPn Emission Factor (lb HAPs/lb Material Processed)</th>
<th>HAPn Emitted Tons Per Month</th>
<th>HAPn Emissions (tons per 12 consecutive months)</th>
<th>Total HAPs Emitted (tons/mo)</th>
<th>Total HAPs Emitted (tons per 12 consecutive months)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Process A</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Process B</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Etc.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Insig. Sources</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Notes:
* The tons per 12-consecutive Month value is the sum of the HAPs emissions in the 11 months preceding the month just completed plus the HAPs emissions in the month just completed. All data, including all required calculations, must be entered in accordance with **Condition E3-5**.
E3-8. The permittee listed various insignificant and exempt activities in their Title V application per Rule 1200-03-09-.04(5). 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 V-2 application form along with a truth, accuracy and completeness statement signed by a responsible official.

Tenn. Comp. R. & Regs. 1200-03-09-.03(8)

E3-9. The permittee shall comply with all the terms and conditions of the Title V permit #572478 and the modifications for this source.

Tenn. Comp. R. & Regs. 1200-03-09-.03(8)

E3-10. Identification of Responsible Official, Technical Contact, and Billing Contact:

(a) The applications that were utilized in the preparation of this permit are dated January 31, 2017 and October 16, 2017. The application dated January 31, 2017, was signed by Jim Fitzgerald. The most recent application was signed by Responsible Official, David Kazmark, Plant Manager of the permitted facility. If this person terminates his employment or is assigned different duties such that he 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 thirty (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 applications that were utilized in the preparation of this permit are dated January 31, 2017 and October 16, 2017, and identify Joe Cox, EHS Manager as the Principal Technical Contact for the permitted facility. If this person terminates his employment or is assigned different duties such that he 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 thirty (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 applications that were utilized in the preparation of this permit are dated January 31, 2017, and October 16, 2017, and identify Joe Cox, EHS Manager as the Billing Contact for the permitted facility. If this person terminates her employment or is assigned different duties such that he 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 thirty (30) days of the change. The notification shall include the name and title of the new Billing Contact and certification of truth and accuracy.

Tenn. Comp. R. & Regs. 1200-03-09-.03(8)
Table 1: NSPS VOC EMISSIONS FOR UNDERTREAD CEMENTING

<table>
<thead>
<tr>
<th>Compliance period ( \text{(I), (II), \ldots etc} )</th>
<th>Cement Usage-exclusively for under tread cementing ( \text{gallons} ) ( L_c )</th>
<th>Cement Density ( \text{(pounds/gallon)} ) ( D_c )</th>
<th>Weight fraction of VOC in cement ( W_o )</th>
<th>VOC emissions Pounds ( M_o )</th>
</tr>
</thead>
<tbody>
<tr>
<td>( \sum (L_c)(D_c)(W_o) )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

40 CFR Part 60 subpart BBB §60.542 (a) (1)

**Compliance Method:** Compliance shall be assured by maintaining records of material usage in the following form or equivalent:

\( M_o = \sum (L_c)(D_c)(W_o) \)

**E4-2.** For each sidewall cementing operation (Lines 2 or 3):

Maintain total (uncontrolled) VOC use less than or equal to the levels specified below, depending upon the duration of the compliance period:

\( \text{(I)} \) 3,220 kg (7,099 lb) of VOC per 28 days,  
\( \text{(II)} \) 3,340 kg (7,363 lb) of VOC per 29 days,  
\( \text{(III)} \) 3,450 kg (7,606 lb) of VOC per 30 days,  
\( \text{(IV)} \) 3,570 kg (7,870 lb) of VOC per 31 days, or  
\( \text{(V)} \) 4,030 kg (8,885 lb) of VOC per 35 days.

40 CFR Part 60 subpart BBB §60.542(a)(2) (ii)

**Compliance Method:** Compliance is assured by maintaining records of the amount of sidewall cement used and the VOC content of the sidewall cement used per month in the following form or equivalent.
Table 2: NSPS VOC EMISSIONS FOR SIDEWALL CEMENTING

<table>
<thead>
<tr>
<th>Compliance period (I), (II), …etc</th>
<th>Cement Usage-exclusively for under tread cementing gallons</th>
<th>Cement Density (pounds/gallon)</th>
<th>Weight fraction of VOC in cement</th>
<th>VOC emissions Pounds</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

E4-3. The owner or operator shall conduct monthly performance tests if not using water based tread end cements.

The owner or operator of each tread end cementing operation and each green tire spraying operation subject to the Rubber Tire NSPS (Lines 2 and 3), using only water-based sprays (inside and/or outside) containing less than 1.0 percent, by weight, of VOC is not required to conduct a monthly performance test. In lieu of conducting a monthly performance test, the owner or operator of each tread end cementing operation and each green tire spraying operation shall submit formulation data or the results of Method 24 analysis annually to verify the VOC content of each tread end cement and each green tire spray material, provided the spraying formulation has not changed during the previous 12 months. If the spray material formulation changes, formulation data or Method 24 analysis of the new spray shall be conducted to determine the VOC content of the spray and reported within 30 days as required under 40 CFR §60.546(j).

40CFR Part 60 Subpart BBB §60.543(b)(4) and Tenn. Comp. R. & Regs. 1200-03-09-.03(8)

E4-4. VOC emissions for tread-end cementing for Lines 2 and 3 shall be no more than 10 grams of VOC (0.022 pounds) per tire cemented, on a monthly basis.

40 CFR Part 60 subpart BBB §60.542(a)(3) and Tenn. Comp. R. & Regs. 1200-03-09-.03(8)

Compliance Method: Compliance with above limit shall be assured by maintaining records of material usage in the following form or equivalent.

Table 3: TREAD-END CEMENTING VOC EMISSIONS (LINES 2 and 3)

<table>
<thead>
<tr>
<th>Month</th>
<th>Cement Usage-exclusively for tread end spraying (gallons)</th>
<th>Cement Density (pounds per gallon)</th>
<th>Weight Fraction of VOC</th>
<th>Total VOC emissions (pounds)</th>
<th>Number of tires produced per month</th>
<th>pounds of VOC per tire</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

\[ Mo = \sum_{i=1}^{Lc}(Lc)(Dc)(Wo) \]

\[ G = \frac{Mo}{To} \]

E4-5. Volatile organic compounds and hazardous air pollutants (HAPs) emitted from Lines #1, #2, and #3 including VOCs from tread cementing, solvents and rubber processing, shall be calculated by maintaining records of material usage and VOC emissions in the form of Tables 4, 5 and 6 or equivalent. The calculations in Table 6 will also be used to report the fee emissions required by Condition E1.

Tenn. Comp. R. & Regs. 1200-03-07-.07(2)
Table 4: MONTHLY VOC LOG (Rubber Processing)  

<table>
<thead>
<tr>
<th>Type of Rubber</th>
<th>Total Rubber Processed (lbs.)</th>
<th>VOC Emission Factor*(lb VOC/lb of rubber processed.)</th>
<th>VOC Emissions (tons/mo.)</th>
<th>HAP (lbs per lb of rubber processed)</th>
<th>Total HAP emissions (tons/mo)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fabric</td>
<td></td>
<td>0.000475</td>
<td></td>
<td>0.0000840</td>
<td></td>
</tr>
<tr>
<td>Bead</td>
<td></td>
<td>0.0000515</td>
<td></td>
<td>0.0000225</td>
<td></td>
</tr>
<tr>
<td>Tread</td>
<td></td>
<td>0.000258</td>
<td></td>
<td>0.0000585</td>
<td></td>
</tr>
</tbody>
</table>

For each month, the monthly VOC emissions due to rubber processing operations (Column C) are to be calculated according to the following equation (letters represent columns in Table 3: C=(A)(B)/(2000).

* Rubber Manufacturers Association Emission Factors

Table 5: Material Usage

<table>
<thead>
<tr>
<th>Month</th>
<th>Material Name</th>
<th>Total Material (cement, solvents etc) Used (gallons/month)</th>
<th>VOC content (pounds/gallon)</th>
<th>VOC Emissions (pounds/mo.)</th>
<th>HAP (%)</th>
<th>Total HAP emissions (pounds/mo)</th>
</tr>
</thead>
</table>

Table 6: Total VOC and HAPs from rubber processing and usage

<table>
<thead>
<tr>
<th>Month/Year</th>
<th>Total VOC Emissions (tons/mo.) From Table 4</th>
<th>Total VOC Emissions (tons/mo.) From Table 5</th>
<th>VOC Emissions during 12 consecutive months</th>
<th>HAP emissions from Table 4</th>
<th>HAP emissions from Table 5</th>
<th>Total combined HAPs per 12 consecutive months</th>
</tr>
</thead>
</table>
01-0114-04 Tire building

Once the tire components have been assembled, the green tire is sprayed with a lubricant to prevent the tire from sticking to the press. After the tires are sprayed, they are sent to the molding and curing presses where they are given their shape. The green tires are placed in the press and steam is applied. Once the press is opened and the tires are removed, the VOCs and HAPs liberated by the curing are released into several overhead exhaust fans. NSPS

E5-1. For each green tire spraying operation where only water-based sprays are used:

(i) Discharge into the atmosphere no more than 1.2 grams (0.0026 pounds) of VOC per tire sprayed with an inside green tire spray for each month; and

(ii) Discharge into the atmosphere no more than 9.3 grams (0.02 pounds) of VOC per tire sprayed with a water-based outside green tire spray for each month

40 CFR Part 60 subpart BBB §60.542(a)(5)

Compliance Method:

(a). Each owner or operator of a green tire spraying operation using water-based sprays containing less than 1.0 percent by weight of VOC, as specified under §60.543(b)(4), shall maintain records of formulation data or the results of Method 24 analysis conducted to verify the VOC content of the spray in the following log or equivalent.

40 CFR §60.545(f)

Table 7

<table>
<thead>
<tr>
<th>Month</th>
<th>Name of the spray</th>
<th>VOC content &lt;1% (yes/no)</th>
<th>Method 24/formulation data submitted to TDAPC? Yes/no</th>
<th>Date Method 24 information submitted</th>
<th>Date when discontinued the spray</th>
</tr>
</thead>
</table>

(b) For water based sprays greater than 1% by weight of VOC, records shall be kept in the following log or equivalent:

Table 8 – VOC EMITTED PER TIRE (For both inside and outside spray)

<table>
<thead>
<tr>
<th>Month</th>
<th>Name of the tire spray used</th>
<th>Operation (Inside or outside spraying)</th>
<th>Amount Material Used (gallons)</th>
<th>Material Density (lbs/gal)</th>
<th>Mass of VOC used, (pounds)</th>
<th>Number of tires sprayed</th>
<th>VOC pounds per tire $G = \frac{Mo}{To}$</th>
</tr>
</thead>
</table>

For each affected facility that seeks to comply with a g/tire limit without the use of a VOC emission reduction system,

Calculations: Determine the total number of tires sprayed at the affected facility for the month $(To)$ by the following procedure:

(i) For a green tire spraying operation that uses water-based inside green tire sprays, $To$ equals the number of green tires that receive an application of water-based inside green tire spray for the month.
(ii) For a green tire spraying operation that uses water-based outside green tire sprays, To equals the number of green tires that receive an application of water-based outside green tire spray for the month.

E5-2. For each green tire spraying operation where only organic solvent-based sprays are used:

Maintain total (uncontrolled) VOC use less than or equal to the levels specified below, depending upon the duration of the compliance period:

(I) 3,220 kilograms (7099 pounds) of VOC per 28 days,
(II) 3,340 kilograms (7363 pounds) of VOC per 29 days,
(III) 3,450 kilograms (7606 pounds) of VOC per 30 days,
(IV) 3,570 kilograms (7870 pounds) of VOC per 31 days, or
(V) 4,030 kilograms (8885 pounds) of VOC per 35 days, or

40 CFR Part 60 subpart BBB §60.542(a)(6)(ii)

**Compliance Method:** Compliance with the above shall be assured by keeping the log given below or equivalent. The permittee shall also specify the monthly work schedule to determine the compliance period.

Table 9 - VOC EMISSIONS

<table>
<thead>
<tr>
<th>Compliance period</th>
<th>Name of the spray material</th>
<th>Usage for green tires (gallons/specification period)</th>
<th>Material Density (pounds/gallon)</th>
<th>Weight Fraction VOC</th>
<th>VOC emissions (Pounds)</th>
</tr>
</thead>
</table>

E5-3. (i) The owner or operator shall conduct monthly performance tests if not using water-based green tire sprays.

(ii) The owner or operator of each tread end cementing operation and each green tire spraying operation subject to the Rubber Tire NSPS, using only water-based sprays (inside and/or outside) containing less than 1.0 percent, by weight, of VOC is not required to conduct a monthly performance test. In lieu of conducting a monthly performance test, the owner or operator of each green tire spraying operation shall submit formulation data or the results of Method 24 analysis annually to verify the VOC content of each green tire spray material.

(iii) If the spray material formulation changes, formulation data or Method 24 analysis of the new spray shall be conducted to determine the VOC content of the spray and reported within 30 days as required under 40 CFR §60.546(j).

40 CFR Part 60 Subpart BBB §60.543(b)(4).

**Compliance Method:** Compliance shall be assured by submitting Tables 7, 8 and 9 for every compliance period/month to the Technical Secretary at the end of 6-month period with the semiannual report.

E5-4. Particulate emissions from source 04 shall not exceed 0.02 grains per dry standard cubic foot (4.67 pounds per hour) and 20.45 tons per 12 consecutive months.

Tenn. Comp. R. & Regs. 1200-03-7-.04(1)

**Compliance Method:** Routine maintenance, as required to maintain specified emission limits, shall be performed on the air pollution control device(s). Maintenance records 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.

E5-5. For fee purposes, the actual emissions of volatile organic compounds shall be calculated as indicated in Table 10.

Tenn. Comp. R. & Regs. 1200-03-26-.02(9).
Table 10: Monthly VOC emissions

<table>
<thead>
<tr>
<th>Month</th>
<th>VOC from the Mixers (lbs)</th>
<th>VOC from under tread cementing (lbs)</th>
<th>VOC from tread end cementing (lbs)</th>
<th>VOC from sidewall spraying</th>
<th>VOC from green tire spraying</th>
<th>VOC from curing and molding</th>
<th>Total VOCs from the source</th>
<th>Total VOCs per 12 consecutive months</th>
</tr>
</thead>
<tbody>
<tr>
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<tr>
<td>Total</td>
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</tr>
</tbody>
</table>

E5-6. The VOC and HAP emissions from molding and curing operation shall be calculated by maintaining records of material usage in the table given below or equivalent.

Table 11 - MONTHLY MOLDING AND CURING

<table>
<thead>
<tr>
<th>Tires/ month</th>
<th>Pounds of rubber per tire</th>
<th>VOC Emission Factor (0.000337 lbs/lbs of rubber)</th>
<th>VOC emissions (pounds of VOC per month)</th>
<th>Total VOC (Pounds of VOC per 12 consecutive months)</th>
<th>HAP1 emission factor (44.2136 % of total VOC)</th>
<th>HAPn* emission factor (% of total VOC)</th>
<th>HAPn emissions (lbs per month)</th>
<th>Total HAP (pounds of HAP per 12 consecutive months)</th>
</tr>
</thead>
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</tr>
</tbody>
</table>

*n: number of each individual HAP emitted

01-0114-05 Two Boilers Two boilers (95 MMBtu/hr & 92.27 MMBtu/hr) are used to provide the steam for the facility. The primary fuel used is natural gas and the secondary fuel is #2 fuel oil. Both boilers are regulated under NSPS standard 40 CFR Part 60 Subpart Dc. The 95 MMBtu/hr boiler is subject to National Emission Standards for Hazardous Air Pollutant regulation for Industrial, Commercial and Institutional Boilers at Area Sources, Generally Applicable Control Technology (GACT) 40 CFR 63 Subpart JJJJJ (6J) and is defined under Subpart 6J as an “existing” source in the “oil subcategory”. The 92.27 MMBtu/hr boiler meets the definition of a gas-fired boiler as defined in §63.11237 of Subpart 6J and therefore is not subject to this subpart.

E6-1. Heat input for this source shall not exceed 95 million Btu per hour (MMBtu/hr), on a daily average basis.

This emission limitation is established pursuant to Tenn. Comp. R. & Regs. 1200-03-06-.01(7) and the agreement letter dated October 13, 2017, from the permittee.

Compliance Method: The two boilers shall not operate simultaneously. Steam from the primary boiler shall keep the second boiler in ready condition. No fuel shall be needed to keep the back-up boiler ready. Compliance with the fuel usage limit in Condition E6-2 shall assure compliance with the heat input.
E6-2. Total fuel oil usage for this source shall not exceed 2,600,000 gallons of #2 fuel oil and 832,000,000 cubic feet of natural gas during all intervals of 12 consecutive months.

This emission limitation is established pursuant to Rule 1200-03-06-.01(7) of the Tennessee Air Pollution Control Regulations and the agreement letter, dated October 13, 2017, from the permittee. Tenn. Comp. R. & Regs. 1200-03-10-.02(2)(a)

Compliance method: Compliance shall be assured by recordkeeping of fuel usage on a monthly basis for each boiler.

Table 12: MONTHLY FUEL USAGE LOG

<table>
<thead>
<tr>
<th>Month/ year</th>
<th>Boiler #1 (95 MMBtu/hr)</th>
<th>Boiler #2 (92.27 MMBtu/hr)</th>
<th>Total Natural Gas Usage</th>
<th>Total #2 Fuel Oil Usage</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Natural Gas Usage (scf)</td>
<td>Natural Gas Usage (scf)</td>
<td>#2 Fuel Oil Usage (gal.)</td>
<td>Operating Time on Fuel Oil (hours)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>scf/mo</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>scf/12 cons. mo</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>gal/mo</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>gal/12 cons. mo</td>
</tr>
</tbody>
</table>

E6-3. Particulate matter emitted from this source shall not exceed 2.24 pounds per hour and 6.07 tons per 12 consecutive months.

This emission limitation is established pursuant to Rule 1200-03-06-.01(7) of the Tennessee Air Pollution Control Regulations and the agreement letter, dated October 13, 2017, from the permittee.

Compliance method: Compliance with the hourly emission limitation of particulate matter shall be assured by complying with Condition E6-4. Compliance with the annual limit shall be assured by calculating monthly emissions using emission factors published in Table 1.3-2 and Table 1.4-2 of EPA AP-42, Fifth Edition and the fuel usage identified in Condition E6-2.

NOx emissions for the 92.27 MMBtu/hr boiler are based on 30 ppm @ 3% excess oxygen (36.4 lb NOx/MMscf nat. gas).

E6-4. Only natural gas or #2 fuel oil shall be used as fuels for this source.

This emission limitation is established pursuant to Rule 1200-03-06-.01(7) and the previous Title V permit 562998.

Compliance Method: Compliance with this condition shall be assured by maintaining the records in Table 12.

E6-5. Sulfur dioxide emitted from this source shall not exceed 4.82 pounds per hour and 9.37 tons per 12 consecutive months.

This yearly emission limitation is established pursuant to Rule 1200-03-06-.01(7) of the Tennessee Air Pollution Control Regulations and the agreement letter, dated October 13, 2017, from the permittee.

Compliance Method: Compliance assurance is based on compliance with Conditions E6-2 and E6-7.

E6-6. Nitrogen Oxides emitted from this source shall not exceed 13.57 pounds per hour and 49.41 tons per 12 consecutive months.

This emission limitation is established pursuant to Rule 1200-03-06-.01(7) of the Tennessee Air Pollution Control Regulations and the agreement letter, dated October 13, 2017, from the permittee.

Compliance Method: Compliance with hourly emission limitation of NOx shall be assured by complying with Condition E6-4.
E6-7.  Sulfur content of the #2 fuel oil shall not exceed 0.5%.

40 CFR Part 60 Subpart Dc

**Compliance Method:** The company shall obtain a certification of the fuel sulfur content (by weight) for each shipment of fuel oil from the fuel supplier. The statement shall indicate that sulfur content of the fuel oil was less than 0.5% sulfur by weight.

E6-8(SM1).  The permittee shall calculate the actual emissions of nitrogen oxides, particulate matter, sulfur dioxide, and volatile organic compounds using the emission factors from the most recent edition of *AP 42, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*. The emission factors are to be used with the actual amount of fuel combusted for the current accounting period. Tenn. Comp. R. & Regs. 1200-03-10-.02(2)(a)

<table>
<thead>
<tr>
<th>Table 12b – Monthly Natural Gas/Fuel Oil Usage and Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Month/Year:</td>
</tr>
<tr>
<td>Fuel Type</td>
</tr>
<tr>
<td>-----------------</td>
</tr>
<tr>
<td>Natural Gas</td>
</tr>
<tr>
<td>#2 Fuel Oil</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
</tr>
</tbody>
</table>

E6-9.  This facility is considered an area source of HAP emissions. The 95 MMBtu/hr oil fired boiler is considered an existing affected source for National Emission Standards for Hazardous Air Pollutant for Industrial, Commercial and Institutional Boiler Area Sources regulation 40 CFR part 63, subpart JJJJJJ.

40 CFR §63.11194(a)(1) and Tenn. Comp. R. & Regs. 1200-03-09-.03(8)

E6-10.  The 95 MMBtu/hr boiler achieved compliance with the work practice or management practice standard February 18, 2014.

40 CFR § 63.11196 and Tenn. Comp. R. & Regs. 1200-03-09-.03(8)

E6-11.  The permittee must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to 40 CFR part 63, subpart JJJJJJ that applies to your boiler. A facility that operates under an energy management program established through energy management systems compatible with ISO 50001, that includes the affected units, also satisfies the energy assessment requirement.

Existing oil-fired boilers with heat input capacity greater than 5 MMBtu/hr that do not meet the definition of seasonal boiler or limited-use boiler, are required to conduct an initial tune-up as specified in 40 CFR § 63.11214, and conduct a tune-up of the boiler biennially as specified in 40 CFR § 63.11223.

40 CFR § 63.11201(b) and Tenn. Comp. R. & Regs. 1200-03-09-.03(8)

The boiler had a one-time energy assessment performed by a qualified energy assessor on February 18, 2014.
E6-12. General requirements

At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

40 CFR § 63.11205 and Tenn. Comp. R. & Regs. 1200-03-09-.03(8)

E6-13. Initial compliance requirements:

Initial compliance with applicable work practice standards, management practices, or emission reduction measures, was demonstrated February 18, 2014, for the 95 MMBtu/hr boiler.

40 CFR § 63.11210 and Tenn. Comp. R. & Regs. 1200-03-09-.03(8)

E6-14. Initial compliance with the work practice standard, emission reduction measures, and management practice

If you own or operate an existing or new oil-fired boiler, you must conduct a performance tune-up according to 40 CFR §63.11223(b) and you must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted a tune-up of the boiler.

A signed certification in the Notification of Compliance Status report was submitted August 19, 2014. An energy assessment of the boiler and its energy use systems was completed according to Table 2 to 40 CFR part 63, subpart JJJJJJ.

40 CFR § 63.11214 and Tenn. Comp. R. & Regs. 1200-03-09-.03(8)

E6-15. Demonstrate continuous compliance with the work practice and management practice standards

(a) For affected sources subject to the work practice standard or the management practices of a tune-up, you must conduct a performance tune-up according to paragraph (b) of this condition and keep records as required in 40 CFR § 63.11225(c) to demonstrate continuous compliance. You must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up.

(b) You must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in paragraphs (b)(1) through (7) of this condition. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.

(1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection.

(2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer’s specifications, if available.

(3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection.

(4) Optimize total emissions of CO. This optimization should be consistent with the manufacturer’s specifications, if available, and with any nitrogen oxides requirement to which the unit is subject.

(5) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
(6) Maintain on-site and submit, if requested by the Technical Secretary, a report containing the information in paragraphs (b)(6)(i) through (iii) of this condition.
   (i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
   (ii) A description of any corrective actions taken as a part of the tune-up of the boiler.
   (iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
(7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

40 CFR § 63.11223 and Tenn. Comp. R. & Regs. 1200-03-09-.03(8)

E6-16. Notification, reporting, and recordkeeping, requirements

(a) You must submit all of the notifications that apply to you by the dates specified in section 40 CFR §63.9. The Initial Notification of Compliance Status report has been submitted for the 95 MMBtu/hr boiler.

(b) You must prepare, by March 1 of each year, (This date is changed by mutual agreement, to coincide with annual compliance certification period for your Title V permit (October 1 through September 30) per 40 CFR §63.10(a)(5), an annual compliance certification report for the previous calendar year containing the information specified below. For boilers that are subject only to a requirement to conduct a biennial tune-up according to 40 CFR § 63.11223(a) and not subject to emission limits or operating limits, you may prepare only a biennial compliance report as specified in paragraphs (b)(1) and (2) of this condition.

   (1) Company name and address.
   (2) Statement by a responsible official, with the official’s name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. Your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
      (i) “This facility complies with the requirements in 40 CFR § 63.11223 to conduct a biennial, of each boiler.”
      (ii) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: “No secondary materials that are solid waste were combusted in any affected unit.”
      (iii) “This facility complies with the requirement in 40 CFR §§ 63.11214(d) and 63.11223(g) to minimize the boiler’s time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer’s recommended procedures or procedures specified for a boiler of similar design if manufacturer’s recommended procedures are not available.”
   (3) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.

(c) You must maintain the records specified below:

   (1) As required in 40 CFR § 63.10(b)(2)(xiv), you must keep a copy of each notification and report that you submitted to comply with 40 CFR part 63 subpart JJJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.
   (2) You must keep records to document conformance with the work practices, emission reduction measures, and management practices required by 40 CFR § 63.11214 and § 63.11223 as specified in paragraphs (c)(2)(i) through (ii) of this condition.
      (i) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
      (ii) For each boiler required to conduct an energy assessment, you must keep a copy of the energy assessment report.
   (3) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.
   (4) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR § 63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

(d) Your records must be in a form suitable and readily available for expeditious review. You must keep each record for 5 years following the date of each recorded action. You must keep each record on-site or be accessible from a central location.
by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. You may keep the records off site for the remaining 3 years.

(e) If you have switched fuels or made a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within subpart JJJJJJ, in the boiler becoming subject to subpart JJJJJJ, or in the boiler switching out of subpart JJJJJJ due to a change to 100 percent natural gas, or you have taken a permit limit that resulted in you being subject to subpart JJJJJJ, you must provide notice of the date upon which you switched fuels, made the physical change, or took a permit limit within 30 days of the change. The notification must identify:

1. The name of the owner or operator of the affected source, the location of the source, the boiler(s) that have switched fuels, were physically changed, or took a permit limit, and the date of the notice.
2. The date upon which the fuel switch, physical change, or permit limit occurred.

40 CFR § 63.11225 and Tenn. Comp. R. & Regs. 1200-03-09-.03(8)

E6-17. The permittee shall comply with the applicable General Provisions to 40 CFR Part 63 Subpart JJJJJJ as summarized in §40 CFR 63.11235, Table 8, for the 95 MMBtu/hr boiler. Tenn. Comp. R. & Regs. 1200-03-09-.03(8)

E6-18. The use of #2 fuel oil in the 92.27 MMBtu boiler will be limited to periods of gas curtailment, gas supply, interruption, startups, or for periodic testing, maintenance, or operator training on liquid fuel. Periodic testing, maintenance, or operator training on liquid fuel shall not exceed a combined total of 48 hours during and calendar year.

This limitation is established pursuant to Rule 1200-03-06-.01(7) of the Tennessee Air Pollution Control Regulations and the agreement letter dated October 13, 2017, from the permittee.

**Compliance Method:** Compliance with this condition shall be assured by maintaining the records in Table 12.

| 01-0114-07 Raw Material Handling | Carbon black is brought in by truck or rail car and offloaded to the carbon black transporter with indoor baghouse control (650 cfm). From the transporter, carbon black is conveyed to raw material storage silos with bin vents. Carbon black is also unloaded from bulk bags in to an indoor hopper with baghouse control (600 cfm) and is conveyed to the carbon black transporter. From the storage silos, carbon black is pneumatically transferred to the day bins and then to mixing. |

E7-1. Particulate matter emissions from this source shall not exceed 0.25 gr/dscf (2.67 pounds per hour).

Tenn. Comp. R. & Regs. 1200-03-07-.04(2)

**Compliance Method:** Routine maintenance, as required to maintain specified emission limits, shall be performed on the air pollution control device(s). Maintenance records 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.
Rubber Mixing

A conveyor feeds the raw materials into two Banbury mixers, Mixer #1 and Mixer #2. Carbon black, powders, pellets and oils are fed into the Banbury and mixed. VOCs, HAPs and PM are released during the feeding and mixing process. The particulates are controlled using a baghouse connected to each mixer.

E8-1. Particulate emissions from rubber mixing shall be limited to 0.02 grains per dry standard cubic foot. (5.26 pounds per hour)

This emission limitation is established pursuant to Tenn. Comp. R. & Regs. 1200-03-07-.01(5) and the agreement letter dated August 3, 2004 from the permittee.

Compliance Method: For Rubber Mixing Baghouse Dalamatic DCE (Mixer #1) and Carbon Black Baghouse Donaldson Torit (Mixer #2) the permittee shall follow the submitted CAM plan:

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Visible Emissions</th>
<th>Pressure Drop</th>
</tr>
</thead>
<tbody>
<tr>
<td>Measurement Approach</td>
<td>Visible Emissions from the baghouse exhaust will be monitored daily using EPA Reference Method 22-like procedures. (visible/no visible)</td>
<td>Pressure Drop across each baghouse is measured with a differential pressure gauge</td>
</tr>
</tbody>
</table>

II. Indicator Range

<table>
<thead>
<tr>
<th>QIP Threshold</th>
<th>Indicator Range</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>An excursion is defined as the presence of visible emissions. Excursions trigger an inspection, corrective action, and reporting requirement.</td>
</tr>
<tr>
<td>Minimum pressure across the Mixer #1 Dalamatic DCE baghouse and the Mixer #2 Carbon Black Baghouse is 1.0 inch of water. An excursion is defined as a pressure drop value expressed in inches of water, out of range established for each dust collector. Excursions trigger an inspection, corrective action and a reporting requirement.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>None selected</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>None selected</td>
</tr>
</tbody>
</table>

III. Performance Criteria

A. Data Representativeness

<table>
<thead>
<tr>
<th>Measurements are made at the emission point (baghouse exhaust)</th>
<th>Pressure taps are located at the baghouse inlets and outlet. The gauges have a minimum accuracy of 0.25 in H2O</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minimum 95% of reading observed during monitoring period.</td>
<td>The gauges must operate at least 95% of the time the source is operating. Records must be kept to show compliance with this requirement.</td>
</tr>
</tbody>
</table>

B. Verification of operational Status

<table>
<thead>
<tr>
<th>Minimum 95% of reading observed during monitoring period.</th>
<th>The pressure gauges are calibrated annually. Pressure taps are checked for plugging daily and entered into a form or a checklist.</th>
</tr>
</thead>
</table>

C. QA/QC Practices and Criteria

<table>
<thead>
<tr>
<th>The observer will be familiar with EPA Method 22.</th>
<th>Pressure drops are manually recorded once per day for each baghouse during operation.</th>
</tr>
</thead>
</table>

D. Monitoring frequency

<table>
<thead>
<tr>
<th>Daily</th>
<th>Pressure drop is monitored continuously but recorded once per day.</th>
</tr>
</thead>
</table>

Data Collection Procedure

<table>
<thead>
<tr>
<th>The VE observation is documented</th>
<th>Pressure drops are manually recorded once per day for each baghouse during operation.</th>
</tr>
</thead>
</table>

Averaging period

| n/a | n/a |
**E8-2.** Volatile Organic Compound emissions and hazardous air pollutants from this source shall be tracked by keeping records in the following format or equivalent.

Tenn. Comp. R. & Regs.1200-03-10

**Table 13**

<table>
<thead>
<tr>
<th>Rubber Type</th>
<th>Amt. Of Rubber Mixed (lbs)</th>
<th>VOC Emission Factor (lb VOC/lb rubber)</th>
<th>VOC Emissions (tons)</th>
<th>HAP Emission factor lb HAP/lb rubber</th>
<th>HAP Emissions (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fabric Rubber</td>
<td></td>
<td>0.000136</td>
<td></td>
<td>5.91E-05</td>
<td></td>
</tr>
<tr>
<td>Bead Rubber</td>
<td></td>
<td>0.000215</td>
<td></td>
<td>4.19E-05</td>
<td></td>
</tr>
<tr>
<td>Tread Rubber</td>
<td></td>
<td>0.0000984</td>
<td></td>
<td>4.87E-05</td>
<td></td>
</tr>
</tbody>
</table>

**END OF SIGNIFICANT MODIFICATION #1 TO PERMIT NUMBER: 572478**
ATTACHMENT 1

OPACITY MATRIX DECISION TREE for
VISIBLE EMISSION EVALUATION METHOD 9

Amended September 11, 2013
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 Evaluation Tests (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, NOx, 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.
EPA guidance on VEEs 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 stipulated opacity standards:
EPA guidance on VEEs is to declare only engineering round. No allowance for reader error is given.

*Not applicable to Acid-eros 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

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

Is Emission Unit an Equipment Leak?
Yes → No opacity reading required
No →

Natural Gas or No. 2 Oil-fired Combustion Source?
Yes → No opacity reading required
No →

Is Each Allowable Emission less than or equal to 10 TPY?
Yes → No opacity reading required
No →

Is Each Allowable Emission greater than 10 TPY from Colorless Pollutants (e.g. Colorless VOCs, CO, HCl, HF, Ammonia, or Methane)?
Yes → No opacity reading required
No →

Within one year following Title V permit issuance date conduct an initial 30-minute VEE during normal process operation

Is the highest 6-minute average** less than or equal to 50% of the applicable opacity standard (e.g. 10% opacity for a source having a 20% standard)?
Yes →
Within one year prior to Title V permit expiration date conduct another 30-minute VEE during normal process operation
No →

Is the highest 6-minute average** greater than 50% of the applicable opacity standard (e.g. 11% opacity for a source having a 20% standard) and less than 100% of the applicable opacity standard?

Yes →
Conduct VEEs Semi-annually
No →

Has a semi-annual VEE highest 6-minute average** been greater than or equal to the applicable opacity standard?

Yes →

Is the highest 6-minute average** greater than or equal to the applicable opacity standard & out of compliance taking both round & reader error into consideration?

Yes →
Report deviations from Permit requirements in periodic reports and periodic compliance certifications as required by the Major Source Operating Permit.
No →

Conduct 30-minute VEEs monthly

Have 3 consecutive month VEEs highest 6-minute average** been less than the applicable opacity standard?

No →
Yes →

Report deviations from Permit requirements in periodic reports and periodic compliance certifications as required by the Major Source Operating Permit.
ATTACHMENT 2

CAM Plan for Source 08
COMPLIANCE ASSURANCE MONITORING PLAN

THE CARLSTAR GROUP, LLC
CLINTON, TN

ESN 01-0114-00: RUBBER MILD ENG

I. Background

A. Emission Unit

Description: Rubber Mixing
Identification: Mixers #1 and #2 with Baghouse Control
Facility: The Carlstar Group, LLC
Clinton, TN

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.: TNAPCR 1200-3-7-.01(5), Title V Permit No. 562998,
Condition ES-1 (Min 4-2).

Emission Limits:
Particulate Matter: 0.02 grains/dscf (0.26 pounds per hour)
Monitoring Requirements: Visible emissions, periodic monitoring(PM-22)
Baghouse pressure drop

C. Control Technology

Two fabric filter baghouses

II. Monitoring Approach

The key elements of the monitoring approach are presented in the attached tables.

Appendix D to Title V Renewal Application for CAM (February 2017)
## Monitoring Approach for Bunker MDEQ 2012.
### NOTE: 1. CALLAWAY FOR NONUSE

<table>
<thead>
<tr>
<th>I. Indicator</th>
<th>Visible emissions</th>
<th>Pressure drop</th>
</tr>
</thead>
<tbody>
<tr>
<td>Measurement Approach</td>
<td>Visible emissions from the baghouse exhaust will be monitored daily using EPA Reference Method 22-like procedures. (Visible/Non-visible)</td>
<td>Pressure drop across the baghouse is measured with a differential pressure gauge.</td>
</tr>
</tbody>
</table>

| II. Indicator Range | An excursion is defined as the presence of visible emissions. Excursions trigger an inspection, corrective action, and a reporting requirement. | Minimum pressure across the baghouse is 1.0 inch of water. Excursions trigger an inspection, corrective action, and a reporting requirement. |
| QEP Threshold | None Selected | None Selected |

| III. Performance Criteria | Measurements are made at the emission point (baghouse exhaust) | Pressure taps are located at the baghouse inlet and outlet. The gauge has a minimum accuracy of 0.15 in. H2O. |
| A. Data Representation | Minimum 95% of readings observed during inspection period. | The gauge must operate at least 97% of the time the source is operating. Records must be kept to show compliance with this requirement. |
| B. Verification of Operational Status | The observer will be familiar with EPA Method 22. | The pressure gauge is calibrated annually. Pressure taps are checked for plugging daily and entered into a log or spreadsheet. |
| C. QA/QC Practices and Criteria | Daily. | Pressure drop is measured continuously but recorded once per day. |
| D. Monitoring Frequency | The VE observation is documented. | Pressure drop is manually recorded once per day for each baghouse during operations. |

### Appendix D to Title V Renewal Application for CAM (February 2017)
<table>
<thead>
<tr>
<th>Indicator</th>
<th>Pressure drop</th>
</tr>
</thead>
<tbody>
<tr>
<td>Visible emissions from the baghouse exhaust will be monitored daily using EPA Reference Method 22 procedures (visible/visible).</td>
<td>Pressure drop across the baghouse is measured with a differential pressure gauge.</td>
</tr>
</tbody>
</table>

**Indicator Range**

An excursion is defined as the presence of visible emissions. Excursions trigger an inspection, corrective action, and a reporting requirement.

- Minimum pressure across the baghouse is 10 inches of water. An excursion is defined as a pressure drop value expressed in inches of water, out of range established for each dust collector. Excursions trigger an inspection, corrective action, and a reporting requirement.
- None selected

**QIP Threshold**

- None selected

**Performance Criteria**

<table>
<thead>
<tr>
<th>Description</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Data Representations</td>
<td>Measurements are made at the emission point (baghouse exhaust). Pressure taps are located at the baghouse inlet and outlet. The gauge has a minimum accuracy of 0.2% to 1.0%</td>
</tr>
<tr>
<td>Verification of Operational Status</td>
<td>Minimum 95% of readings observed during monitoring period. The gauge must operate at least 95% of the time the source is operating. Records must be kept to show compliance with that requirement</td>
</tr>
<tr>
<td>QA/QC Practices and Criteria</td>
<td>The observer will be familiar with EPA Method 22. The pressure gauge is calibrated annually. Pressure taps are checked for plugging daily and entered into a form or checklist</td>
</tr>
<tr>
<td>Monitoring Frequency</td>
<td>Daily. Pressure drops are monitored continuously but recorded once per day. The VIP observation is documented. Pressure drop is manually recorded once per day for each baghouse during operation</td>
</tr>
<tr>
<td>Data Collection Procedure</td>
<td>N/A</td>
</tr>
<tr>
<td>Averaging Period</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Appendix D to Title V Revision Application for CAM (February 2017)
1. **Background**

   The pollutant-specific emission units are the two rubber mixers (ERSN 00). Mixer #1 is controlled by a Dalmatic DCE Inc., Model DLM 5/6/15. Mixer #2 is equipped with a Donaldson Torit Model 2SG.

2. **Rational for Selection of Performance Indicators**

   Visible emissions was selected as the performance indicator because it is indicative of good operation and maintenance of the baghouse. When the baghouse is operating properly, there will not be any visible emissions from the exhaust. Any increase in visible emissions indicates reduced performance of a particulate control device; therefore, the presence of visible emissions is used as the first performance indicator.

   In general, baghouses are designed to operate at a relatively constant pressure drop. Monitoring pressure drop provides a means of detecting a change in operation that could lead to an increase in emissions. A decrease in pressure drop may indicate broken or loose bags, but this is also indicated by the presence of visible emissions, indicator number 1. A pressure drop across the baghouse also serves to indicate that there is airflow through the control device.

3. **Rational for Selection of Indicator Ranges**

   The selected indicator range is no visible emissions. When an excursion occurs, corrective action will be initiated, beginning with evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported. An indicator range of no visible emissions was selected because: (1) an increase in visible emissions is indicative of an increase in particulate emissions; and (2) a monitoring technique which does not require a Method 9 certified observer is desired. Although EPA Reference Method 22 applies to fugitive sources, the visible/no visible emissions observation technique of Method 22 can be applied to ducted emissions; i.e., Method 22-like observations.

   The indicator range chosen for the baghouse pressure drop across all of the units is a minimum of 1 inch of water column. If the pressure drop falls below 1 inch H2O during normal process operation, the possibility of broken or loose bags is investigated. The minimum pressure drop values of 1.0 inches of water were originally established as a component of the Title V Compliance Demonstration for this source as contained in Condition 3K 1 (from 4-2) of Permit No. 562990. Should the pressure drop indicator range need to be reestablished (for instance, change in filter media), Calstar will gather 30 days of monitoring data while the source is in operation. The indicator range will be determined from the minimum and maximum pressure drop readings using a set buffer value of 0.5 inch H2O. The low range will be equal to the minimum pressure drop minus 0.5 inch H2O and the high range will be equal to the maximum pressure drop plus 0.5 inches H2O.