PUBLIC NOTICE

AADG, Inc. dba Ceco Door has applied to the Tennessee Department of Environment and Conservation, Division of Air Pollution Control for a renewal to their major source (Title V) operating permit subject to the provisions of Tennessee Air Pollution Control Regulations 1200-03-09-.02(11) (Title V Regulations). A major source operating permit is required by both the Federal Clean Air Act and Tennessee's air pollution control regulations. However, it should be noted that this facility has a current major source operating permit (570158).

The applicant is **AADG, Inc. dba Ceco Door** with a site address of 9159 Telecom Drive, Milan, Tennessee 38358. They have applied for renewal of their existing major source operating permit for their steel door and frame fabrication operation (Permit Number 578717).

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

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

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

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

and

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
Davy Crockett Tower, 7th Floor
500 James Robertson Parkway
Nashville, TN 37243

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

https://www.tn.gov/environment/ppo-public-participation/ppo-public-participation/ppo-air.html

Questions concerning the source(s) may be addressed to Sarosh Kaiser at (615) 342-9439 or by e-mail at sarosh.kaiser@tn.gov

Interested parties are invited to review these materials and comment. In addition, a public hearing may be requested at which written or oral presentations may be made. To be considered, written comments or requests for a public hearing must be received no later than 4:30 PM on March 6, 2025. To assure that written comments are received and addressed in a timely manner, written comments must be submitted using one of the following methods:

1. **Mail, private carrier, or hand delivery:** Address written comments to Ms. Michelle W. Owenby, Director, Division of Air Pollution Control, Davy Crockett Tower, 7th Floor, 500 James Robertson Parkway, Nashville, Tennessee 37243.

2. **E-mail**: Submit electronic comments to air.pollution.control@tn.gov.

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

Individuals with disabilities who wish to review information maintained at the above-mentioned depositories should contact the Tennessee Department of Environment and Conservation to discuss any auxiliary aids or services needed to facilitate such review. Such contact may be in person, by writing, telephone, or other means, and should be made no less than ten days prior to the end of the public comment period to allow time to provide such aid or services. Contact the Tennessee Department of Environment and Conservation ADA Coordinator, Davy Crockett Tower, 6th Floor, 500 James Robertson Parkway, Nashville, TN 37243, (615) 532-0207. Hearing impaired callers may use the Tennessee Relay Service, 1-(800)-848-0298.

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

OPERATING PERMIT (TITLE V) Issued Pursuant to Tennessee Air Quality Act

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

Date Issued: DRAFT

Permit Number:
578717

Date Expires: DRAFT

Issued To:
AADG, Inc. dba Ceco Door

Installation Address:
9159 Telecom Drive
Milan

Installation Description:

Fabricating and Surface Coating of Steel Doors
27-0100-01: Natural Gas Fuel Burning Equipment
27-0100-03, 05, 11, 12, 13, 14, and 18: Surface Coating Operations (Painting)
27-0100-07, 09, and 21: Adhesive Coating Operations

Facility ID: 27-0100

Renewal Application Due Date:
Between **, and **

Primary SIC: 34

Information Relied Upon:
Title V Renewal Applications dated December 4, 2020, and February 23, 2024

(continued on the next page)

TECHNICAL SECRETARY

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

POST AT INSTALLATION ADDRESS

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End of Permit Number 578717

ATTACHMENTS

SECTION A
GENERAL PERMIT CONDITIONS

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

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

TAPCR 1200-03 and 0400-30

A2. **Compliance requirement.** All terms and conditions in a permit issued pursuant to TAPCR paragraph 1200-03-09-.02(11), including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act. The permittee shall comply with all conditions of its permit. Except for requirements specifically designated herein as not being federally enforceable (State Only), non-compliance with the permit requirements is a violation of the Federal Act and the Tennessee Air Quality Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Non-compliance with permit conditions specifically designated herein as not being federally enforceable (State Only) is a violation of the Tennessee Air Quality Act and may be grounds for these actions.

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

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

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

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

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

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

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

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

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

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

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

A8. **Fee payment.**

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

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

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

(d) Where more than one allowable emission limit is applicable to a regulated pollutant, the allowable emissions for the regulated pollutants shall not be double counted. Major sources subject to the provisions of TAPCR 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 standards that can be imposed under TAPCR Chapter 0400-30-38 or Chapter 1200-03-31 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 TAPCR 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 or TAPCR chapter 1200-03-31.

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 TAPCR chapter 1200-03-16 New Source Performance Standards (NSPS) or chapter 0400-30-39 Standards of Performance for New Stationary Sources for pollutants that are neither particulate matter, 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 TAPCR subparagraph 1200-03-26-.02(2)(i).

6. Major 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 major 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 major source operating permit in advance in order to exercise this option. The PM_{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 TAPCR subparagraph 1200-03-26-.02(2)(i) shall also apply to PM_{10} emissions.

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

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

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

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

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

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

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

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

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

A11. Permit shield.
(a) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date of permit issuance, provided that:
1. Such applicable requirements are included and are specifically identified in the permit; or
2. The Technical Secretary, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
(b) Nothing in this permit shall alter or affect the following:
1. The provisions of section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section. Similarly, the provisions of T.C.A. §68-201-109 (emergency orders) including the authority of the Governor under the section;
2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Federal Act; or
4. The ability of EPA to obtain information from a source pursuant to section 114 of the Federal Act.
(c) Permit shield is granted to the permittee.
(d) The permit shield does not apply to permit changes made under the minor permit modification procedures of TAPCR subpart 1200-03-09-.02(11)(f)5(ii) nor the administrative permit amendment procedures of TAPCR part 1200-03-09-.02(11)(f)4, except that the permit shield may be extended for administrative permit amendments that meet the relevant requirements of TAPCR 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.
(e) The permit shield does not apply to off-permit changes made under the operational flexibility provisions of TAPCR part 1200-03-09-.02(11)(a)4.

TAPCR 1200-03-09-.02(11)(e)6 and 1200-03-09-.02(11)(f)4(iv)

A12. Permit renewal and expiration.
(a) An application for permit renewal must be submitted at least 180 days, but no more than 270 days, prior to the expiration of this permit. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted.
(b) If the permittee submits a timely and complete application for permit renewal the source will not be considered to be operating without a permit until the Technical Secretary takes final action on the permit application, except as otherwise noted in TAPCR paragraph 1200-03-09-.02(11).
(c) This permit, its shield provided in Condition A11, and its conditions will be extended and effective after its expiration date provided that the source has submitted a timely, complete renewal application to the Technical Secretary.

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

A13. Reopening for cause.
(a) A permit shall be reopened and revised prior to the expiration of the permit under any of the circumstances listed below:
1. Additional applicable requirements under the Federal Act become applicable to the sources contained in this permit provided the permit has a remaining term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the permit expiration date of this permit, unless the original has been extended pursuant to TAPCR 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 A13, the Administrator 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/she agrees or disagrees with the Administrator's findings. If the Technical Secretary 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), the Technical Secretary shall bring the matter to the Board at its next regularly scheduled meeting for instructions as to how the Division should proceed. The permittee shall be required to file a written brief expressing their position relative to the Administrator's objection and have a responsible official present at the meeting to answer questions for the Board. If the Board agrees that EPA is wrong in their demand for a permit revision, they shall instruct the Technical Secretary to conform to EPA's demand, but to issue the permit under protest preserving all rights available for litigation against EPA.

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

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

(a) Transfer of ownership permit application is filed consistent with the provisions of TAPCR 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.

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

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

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

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

A17. **Notification of changes.** The permittee shall notify the Technical Secretary 30 days prior to commencement of any of the following changes to an air contaminant source which would not be a modification requiring a construction permit.
(a) change in air pollution control equipment
(b) change in stack height or diameter
(c) change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

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

A18. **Schedule of compliance.** The permittee will comply with any applicable requirement that becomes effective during the permit term on a timely basis and no later than required by the provisions of the new applicable requirement. If the permittee is not in compliance the permittee must submit a schedule for coming into compliance which must include a schedule of remedial measure(s), including an enforceable set of deadlines for specific actions.

TAPCR 1200-03-09-.02(11)(d)3, 1200-03-09-.03(8), 0400-30-38, 0400-30-39, 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.

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

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

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

SECTION B

GENERAL CONDITIONS for MONITORING, REPORTING, and ENFORCEMENT

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

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

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

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

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

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

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

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

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

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

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

(a) The identification of each term or condition of the permit that is the basis of the certification;

(b) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;

(c) The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in B5(b) above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion* or exceedance** as defined below occurred; and

(d) Such other facts as the Technical Secretary may require to determine the compliance status of the source.
* "Excursion" shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.
** "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

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

B6. **Submission of compliance certification.** The compliance certification shall be submitted to:

The Tennessee Department of Environment and Conservation Environmental Field Office specified in Section E of this permit	and	Air Enforcement Branch US EPA Region IV 61 Forsyth Street, SW Atlanta, Georgia 30303

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

B7. Reserved

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 TAPCR Division 1200-03 or any permit issued thereto, or of sufficient duration to cause damage to property or public health. The permittee must provide the Technical Secretary with a statement giving all pertinent facts, including the estimated duration of the breakdown, the probable cause of the deviation, and any corrective actions or preventative measures taken. 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 TAPCR Division 1200-03 or any permit issued thereto must be kept at the plant. All information shall be entered in the log no later than twenty-four (24) hours after the startup or shutdown is complete, or the malfunction has ceased or has been corrected. Any later discovered corrections can be added in the log as footnotes with the reason given for the change. This log must record at least the following:

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

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

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

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

61(National emission standards for hazardous air pollutants) and 63(National emission standards for hazardous air pollutants for source categories).

TAPCR 1200-03-20-.02

B10. Reserved.

B11. **Report required upon the issuance of a notice of violation for excess emissions.** The permittee must submit, within twenty days after receipt of the notice of violation, the data required below. If this data has been made 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 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(s) 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 20-day period specified shall preclude the admissibility of the data for determination of potential enforcement action.

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

SECTION C
PERMIT CHANGES

C1. **Operational flexibility changes.** The source may make operational flexibility changes that are not addressed or prohibited by the permit without a permit revision subject to the following requirements:

(a) The change cannot be subject to a requirement of Title IV of the Federal Act or TAPCR Chapter 1200-03-30.

(b) The change cannot be a modification under any provision of Title I of the federal Act or TAPCR 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 TAPCR 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 TAPCR part 1200-03-09-.02(11)(e)6.

(g) The permittee shall keep a record describing the changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. The records shall be retained until the changes are incorporated into subsequently issued permits.

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

C2. **Section 502(b)(10) changes.**

(a) The permittee can make certain changes without requiring a permit revision, if the changes are not modifications under Title I of the Federal Act or TAPCR Division 1200-03 and the changes do not exceed the emissions allowable under the permit. The permittee must, however, provide the Administrator and Technical Secretary with written notification within a minimum of 7 days in advance of the proposed changes. The Technical Secretary may waive the 7-day advance notice in instances where the source demonstrates in writing that an emergency necessitates the change. Emergency shall be demonstrated by the criteria of TAPCR 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 TAPCR part 1200-03-09-.02(11)(e)6 shall not apply to Section 502(b)(10) changes.

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

C3. **Administrative amendment.**

(a) Administrative permit amendments to this permit shall be in accordance with TAPCR 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 TAPCR 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 TAPCR subparagraph 1200-03-09-.02(11)(e), TAPCR subparagraph 1200-03-09-.02(11)(f) and TAPCR 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.

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

C4. **Minor permit modifications.**

(a) The permittee may submit an application for a minor permit modification in accordance with TAPCR 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.

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

C5. **Significant permit modifications.**

(a) The permittee may submit an application for a significant modification in accordance with TAPCR 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.

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

C6. **New construction or modifications.**

Future construction at this facility that is subject to the provisions of TAPCR 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 TAPCR part 1200-03-09-.02(11)(f)4 or the significant modification route of TAPCR 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 TAPCR subpart 1200-03-09-.02(11)(f)5(ii) or group processing of minor modifications under the provisions of TAPCR subpart 1200-03-09-.02(11)(f)5(iii) as applicable to the magnitude of their construction.

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

SECTION D
GENERAL APPLICABLE REQUIREMENTS

D1. **Visible emissions.**

(a) With the exception of air emission sources exempt from the requirements of TAPCR Chapter 1200-03-05 and air emission sources for which a different opacity standard is specifically provided elsewhere in this permit, the permittee shall not cause, suffer, allow or permit discharge of a visible emission from any air contaminant source with an opacity in excess of twenty (20) percent for an aggregate of more than five (5) minutes in any one (1)hour or more than 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 20 percent (6-minute average) except for one six minute period per one hour of not more than 40 percent opacity. Sources constructed or modified after July 7, 1992, shall utilize 6-minute averaging.

(b) Consistent with the requirements of TAPCR Chapter 1200-03-20, due allowance may be made for visible emissions in excess of that permitted under TAPCR 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.

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

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

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

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

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

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

D6. **Sulfur dioxide emission standards.** The permittee shall not cause, suffer, allow, or permit sulfur dioxide emissions from process and non-process sources in excess of the standards in TAPCR 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, water, or suitable chemicals on dirt roads, material stockpiles, 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 20 minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in TAPCR Chapter 1200-03-20.

TAPCR 1200-03-08

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

TAPCR 1200-03-04

D9. **Asbestos.** Where applicable, the permittee shall comply with the requirements of 40 CFR Part 61 when conducting any renovation or demolition activities at the facility.

TAPCR 0400-30-38-.01(2) 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 insignificant emission units or activities. By annual certification of compliance with the conditions in this Section the permittee shall be considered to meet the monitoring and related record keeping and reporting requirements of TAPCR subpart 1200-03-09-.02(11)(e)1(iii) and part 1200-03-10-.04(2)(b)1 and the compliance requirements of TAPCR subpart 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.** The permittee shall comply with all applicable requirements of TAPCR Chapter 0400-30-38 for all emission sources subject to a requirement contained therein.

D12. **Standards of Performance for New Stationary Sources.** The permittee shall comply with all applicable requirements of TAPCR chapters 0400-30-39 and 1200-03-16 for all emission sources subject to a requirement contained therein.

D13. **Gasoline Dispensing Facilities.** The permittee shall comply with all applicable requirements of TAPCR Rule 1200-03-18-.24 for all emission sources subject to a requirement contained therein.

D14. **Internal Combustion Engines.**

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

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

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

TAPCR 0400-30-38 and 39

D15. The permittee shall maintain and repair each emission source, associated air pollution control device(s), and compliance assurance monitoring equipment as required to maintain and assure compliance with the specified emission limits.

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

SECTION E

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

27-0100	Facility Description:	Ceco Door Products – Fabrication and Surface Coating of Metal Doors and Frames. Operations at this facility consist of washing, drying, painting, adhesive coating application, and fuel combustion. This facility is subject to 40 CFR 63, Subpart MMMM - Surface Coating of Miscellaneous Metal Parts and Products and Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.

Conditions E1 through F1-18 apply to all sources in Section E of this permit unless otherwise noted.

E1. Fee payment:

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 27-0100

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	93.92	AEAR	Includes all fee emissions.
PM_{10}	N/A	AEAR	N/A
SO_2	0.11	AEAR	Includes all fee emissions.
VOC	219.60	AEAR	Includes all fee emissions.
NO_X	19.84	AEAR	Includes all fee emissions.
CATEGORY OF MISCELLANEOUS HAZARDOUS AIR POLLUTANTS (HAPs WITHOUT A STANDARD)*			
VOC FAMILY GROUP	N/A	AEAR	Included in VOC above
NON-VOC GASEOUS GROUP	N/A	AEAR	N/A
PM FAMILY GROUP	N/A	AEAR	Included in PM above
CATEGORY OF SPECIFIC HAZARDOUS AIR POLLUTANTS (HAPs WITH A STANDARD)**			
VOC FAMILY GROUP	N/A	AEAR	NESHAP (40 CFR 63 Subpart MMMM). Fee emissions are included in VOC above.
NON-VOC GASEOUS GROUP	N/A	AEAR	N/A
PM FAMILY GROUP	N/A	AEAR	N/A
CATEGORY OF NSPS POLLUTANTS NOT LISTED ABOVE***			
EACH NSPS POLLUTANT NOT LISTED ABOVE	N/A	AEAR	N/A

NOTES

AAP The **Annual Accounting Period** (AAP) is a 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 permit renewal issuance **began July 1, 2024,** and **ends June 30, 2025**. The next Annual Accounting Period begins **July 1, 2025**, and ends **June 30, 2026**, 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) of the TAPCR 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) of the TAPCR, 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. Changes in fee bases must be made using the Title V Fee Selection form, form number APC 36 (CN-1583), included as an attachment to this permit and available on the Division of Air Pollution Control's website.

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 **A**ctual **E**missions **A**nalysis is **R**equired to determine the actual emissions of:

(1) **each regulated pollutant** (Particulate matter, SO_2, VOC, NO_X and so forth. See TAPCR 1200-03-26-.02(2)(i) for the definition of a regulated pollutant.),
(2) **each pollutant group** (VOC Family, Non-VOC Gaseous, and Particulate Family),
(3) the **Miscellaneous HAP Category,**
(4) the **Specific HAP Category**, and
(5) the **NSPS Category**

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

***** **Category of Miscellaneous HAP (HAP without a Standard):** This category is made-up of hazardous air pollutants that do not have a federal or state standard. Each HAP is classified into one of three groups, the **VOC Family** group**, the Non-VOC Gaseous** group**,** or the **Particulate (PM) Family** group**. For fee computation**, the **Miscellaneous HAP Category** is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

****** **Category of Specific HAP (HAP with a Standard):** This category is made-up of hazardous air pollutants (HAP) that are subject to Federally promulgated Hazardous Air Pollutant Standards that can be imposed under Chapter 1200-03-11 or Chapter 1200-03-31. Each individual hazardous air pollutant is classified into one of three groups, the **VOC Family** group**, the Non-VOC Gaseous** group**,** or the **Particulate (PM) Family** group**. For fee computation**, each individual hazardous air pollutant of the **Specific HAP Category** is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

******* **Category of NSPS Pollutants Not Listed Above:** This category is made-up of each **N**ew **S**ource **P**erformance **S**tandard (**NSPS**) pollutant whose emissions are not included in the **PM**, **SO_2, VOC** or **NO_X** emissions from each source in this permit. **For fee computation**, each **NSPS pollutant not listed above** is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

END NOTES

The permittee shall:

(1) Pay Title V **annual emission fees**, on the emissions and year bases requested by the responsible official and approved by the Technical Secretary, for each annual accounting period (AAP) by the payment deadline(s) established in TAPCR 1200-03-26-.02(9)(g). Fees may be paid on an **actual**, **allowable**, or **mixed** emissions basis; and on either a **state fiscal year** or a **calendar year**, provided the requirements of TAPCR 1200-03-26-.02(9)(b) are met. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within 15 days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8).

(2) Sources paying annual emissions fees on an allowable emissions basis: pay annual allowable based emission fees for each annual accounting period no later than April 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d).

(3) Sources paying annual emissions fees on an actual emissions basis: prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
(a) the completed **Fee Emissions Summary Table**,
(b) each **actual emissions analysis** required**,** and
(c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. The summary must include sufficient information for the Technical Secretary to determine the accuracy of the calculations. These calculations must be based on the annual fee basis approved by the Technical Secretary (a state fiscal year [July 1 through June 30] or a calendar year [January 1 through December 31]). These records shall be used to complete the **actual emissions analyses** required by the above **Fee Emissions Summary Table**.

(4) Sources paying annual emissions fees on a mixed emissions basis: for all pollutants and all sources for which the permittee has chosen an actual emissions basis, prepare an **actual**

emissions analysis for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:

(a) the completed **Fee Emissions Summary Table**,

(b) each **actual emissions analysis** required**,** and

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

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

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

The annual emission fee due dates are specified in TAPCR 1200-03-26-.02(9)(g) and are dependent on the Responsible Official's choice of fee bases as described above. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within 15 days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8). Emissions for regulated pollutants shall not be double counted as specified in **Condition A8(d)** of this permit.

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

Payment of Fee to:
The Tennessee Department of Environment and Conservation
Division of Fiscal Services
Consolidated Fee Section – APC
Davy Crockett Tower
500 James Robertson Pkwy, 6th Floor
Nashville, Tennessee 37243

and

Actual Emissions Analyses to:
The Tennessee Department of Environment and Conservation
Division of Air Pollution Control
Emission Inventory Program
Davy Crockett Tower
500 James Robertson Pkwy, 7th Floor
Nashville, Tennessee 37243
or
An electronic copy (PDF) of actual emissions analysis can also be submitted to: apc.inventory@tn.gov

E2. **Reporting requirements**.

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

Permit Number	Reporting Period Begins	Reporting Period Ends
570158	January 1, 2025	day before new permit issuance (with year)
578717	Issuance day of the new permit (with year)	June 30, 2025

These semiannual reports shall include:

(1) Any monitoring and recordkeeping required by **Conditions F2-2**, **E4-1 (Log 1), E5-1 (Log 2), E5-2 (Log 3 and Log 4), E6-1 (Log 5), E6-2 (Log 6 and Log 7)** 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** 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.** The record of deviations/excursions shall include, at a minimum, the time the deviation/excursion was discovered, the corrective action taken, and the time that the deviation/excursion was rectified.

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

TAPCR 1200-03-9-.02(11)(e)1(iii)

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

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

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

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

Annual compliance certifications shall cover the 12-month period from **July 1** to **June 30** and shall be submitted within 60 days after the end of each 12-month period. The first annual compliance certification following issuance of this permit shall cover the following permits and reporting periods:

Permit Number	Reporting Period Begins	Reporting Period Ends
570158	July 1, 2024	Day before new permit issuance (with year)
578717	Issuance date of new permit (with year)	June 30, 2025

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

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

OR
APC.JackEFO@tn.gov

and

Air Enforcement Branch
US EPA Region IV
61 Forsyth Street, SW
Atlanta, Georgia 30303
OR
Through the EPA CDX
(https://cdx.epa.gov/)

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

(c) **40 CFR 63, Subpart MMMM – NESHAP for Surface Coating of Miscellaneous Metal Parts and Products Reporting Requirements**

Semiannual compliance reports for Subpart MMMM, submitted in accordance with **Condition F1-8,** shall cover the six-month periods from **January 1** to **June 30** and **July 1** to **December 31** and shall be submitted within 60 days after the end of each six-month period. Subsequent reports shall be submitted within 60 days after the end of each 6-month period following the first report. The first semiannual MACT compliance report following issuance of this permit shall cover the following permits and reporting periods:

Permit Number	Reporting Period Begins	Reporting Period Ends
570158	January 1, 2025	Day before new permit issuance (with year)
578717	Issuance date of new permit (with year)	June 30, 2025

Required Subpart MMMM reports must be addressed to the Technical Secretary and submitted to the address listed below.

Permitting Program
Division of Air Pollution Control
Davy Crockett Tower, 7th Floor
500 James Robertson Parkway
Nashville, Tennessee 37243

OR
Air.Pollution.Control@tn.gov [preferred]

Pursuant to §63.3920(f) and **Condition F1-8**, the permittee must submit the semiannual compliance reports required by this condition to EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). If the reporting form for the semiannual compliance report specific to Subpart MMMM is not available in CEDRI at the time that the report is due, the permittee must submit the report to the Administrator at the address listed below.

Air Enforcement Branch
US EPA Region IV
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960

(d) **40 CFR 63, Subpart DDDDD – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters Reporting Requirements**

Pursuant to 40 CFR §63.7550 and **Condition F3-6**, the permittee must submit biennial and 5-year Subpart DDDDD compliance reports, as applicable. Each report shall cover the applicable 2- or 5-year reporting periods from January 1 to December 31. Reports must be postmarked or delivered no later than 60 days after the applicable reporting period ends.

Required Subpart DDDDD reports must be addressed to the Technical Secretary and submitted to the address listed in **Condition E2(c)**.

Pursuant to §63.7550(h)(3), the permittee must submit all compliance reports required by Table 9 of Subpart DDDDD electronically to the EPA via the CEDRI. If the reporting form specific to Subpart DDDDD is not available in CEDRI at the time that the report is due, the permittee must submit the report to the Administrator at the address listed in **Condition E2(c)**.

Note that each NESHAP Report, Title V Semiannual Report (SAR), and each Title V Annual Compliance Certification (ACC) must be submitted under separate cover and each report must be accompanied by a separate compliance certification statement.

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

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

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

E3. General Permit Requirements

E3-1. Identification of Responsible Official, Technical Contact, and Billing Contact of the permitted facility:

(a) The application that was utilized in the preparation of this permit is dated February 24, 2024, and signed by Responsible Official Robert Steppe, General Manager, of the permitted facility. If this person terminates employment or is assigned different duties and is no longer a Responsible Official for this facility as defined in part 1200-03-09-.02(11)(b)21 of the Tennessee Air Pollution Control Regulations, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Responsible Official and certification of truth and accuracy. All representations, agreement to terms and conditions, and covenants made by the former Responsible Official that were used in the establishment of the permit terms and conditions will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements, and/or covenants.

(b) The application that was utilized in the preparation of this permit is dated February 24, 2023, and identifies Scott Martin, as the Principal Technical Contact for the permitted facility. If this person terminates employment or is assigned different duties and is no longer the Principal Technical Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Principal Technical Contact and certification of truth and accuracy.

(c) The application that was utilized in the preparation of this permit is dated February 24, 2023, and identifies Terri Abbot, as the Billing Contact for the permitted facility. If this person terminates employment or is assigned different duties and is no longer the Billing Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Billing Contact and certification of truth and accuracy.

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

E3-2. Unless otherwise specified, visible emissions from this facility shall not exhibit greater than 20% opacity, except for one six-minute period in any one-hour period and for no more than four six-minute periods in any 24-hour period. Visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

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

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

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

E3-3. The as-supplied volatile organic compound (VOC) and hazardous air pollutant (HAP) content of all VOC and HAP-containing materials (all coatings, inks, adhesives, thinners, and solvents) to be used by this facility shall be determined from Safety Data Sheets (SDS) or manufacturer or vendor formulation data which explicitly list the VOC and HAP content by weight. If new materials are used, or if material formulation is changed, logs used to calculate emissions of VOC and HAP shall be updated within 30 days from the initial date of usage of the new or altered material. When a range is provided for HAP content on the documentation, the high end of the range shall be used for emission calculations.

TAPCR 1200-03-09-.03(8) and 1200-03-10-.02(2)(a)

Compliance Method: Purchase orders and/or invoices for all VOC- and HAP-containing materials, along with current SDS, must be maintained and kept available for inspection by the Technical Secretary or a Division representative. The SDS must explicitly list the VOC and HAP content by weight for all VOC- and HAP-containing materials. If SDS are not available with this information, vendor formulation data containing the required information for those materials must also be maintained. These records must be retained as specified in **Condition E3-4**. Scanned invoices (maintained electronically) may be used to fulfill this requirement.

E3-4. The following recordkeeping requirements shall apply to this facility:

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

Logs and records specified in this permit shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative and shall be retained for a period of not less than five years unless otherwise noted. Logs and records contained in this permit are based on a recommended format. Any logs and records that have an alternative format may be utilized provided they contain the same information that is required. Computer-generated logs are also acceptable.

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

E3-5. Insignificant activities (as defined at TAPCR 1200-03-09-.04(5)) for this facility are listed in the approved application dated February 24, 2024. Additional insignificant activities may be added and operated at any time with the provision that a written notification shall be submitted to the Technical Secretary, including an updated APC 2 application form along with a truth, accuracy, and completeness statement signed by a responsible official.

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

F1. 40 CFR Part 63, Subpart MMMM Requirements

F1-1. The permittee is subject to and shall comply will all applicable requirements of 40 CFR 63, Subpart MMMM - *National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products* (Subpart MMMM). The facility is an existing affected source, as defined in **Condition F1-2**, that uses 250 gallons per year, or more, of coatings that contain HAP in the surface coating of miscellaneous metal parts and products and is a major source of HAP emissions.

The source category to which Subpart MMMM applies is the surface coating of any miscellaneous metal parts or products, described as the application of coating to a substrate using, for example, spray guns or dip tanks. When application of coating to a substrate occurs, then surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage. However, these activities do not comprise surface coating if they are not directly related to the application of the coating. Coating application with handheld, non-refillable aerosol containers, touch-up markers, marking pens, or the application of paper film or plastic film which may be pre-coated with an adhesive by the manufacturer are not coating operations for the purposes of Subpart MMMM.

Surface coating of miscellaneous metal parts and products includes the subcategories listed in paragraphs (a) through (e) of this condition.

(a) The general use coating subcategory includes all surface coating operations that are not high performance, magnet wire, rubber-to-metal, or extreme performance fluoropolymer coating operations.
(b) The high performance coating subcategory includes surface coating operations that are performed using coatings that meet the definition of high performance architectural coating or high temperature coating in 40 CFR §63.3981.
(c) The magnet wire coating subcategory includes surface coating operations that are performed using coatings that meet the definition of magnet wire coatings in §63.3981.
(d) The rubber-to-metal coatings subcategory includes surface coating operations that are performed using coatings that meet the definition of rubber-to-metal coatings in §63.3981.
(e) The extreme performance fluoropolymer coatings subcategory includes surface coating operations that are performed using coatings that meet the definition of extreme performance fluoropolymer coatings in §63.3981.

Based on the description of these subcategories, the Division has determined that the permittee's coating operation is an affected source in the general use coating subcategory.

A *coating* is defined in §63.3981 as a material applied to a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, paints, sealants, liquid plastic coatings, caulks, inks, adhesives, and maskants. Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances, or paper film or plastic film which may be precoated with an adhesive by the film manufacturer, are not considered coatings for the purposes of this subpart. A liquid plastic coating means a coating made from fine particle-size polyvinyl chloride (PVC) in solution (also referred to as a plastisol).

40 CFR §63.3881(a) - (b) and §63.3981

F1-2. An affected source is the collection of all of the items listed in paragraphs (a) through (d) of this condition that are used for surface coating of miscellaneous metal parts and products within the general use coating subcategory.

(a) All coating operations as defined in §63.3981;
(b) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
(c) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
(d) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

40 CFR §63.3882(b)

F1-3. The permittee must limit organic HAP emissions to the atmosphere from each existing general use coating affected source to no more than 2.6 pounds of organic HAP per gallon of coating solids used during each 12-month compliance period. The permittee must be in compliance with this emission limit at all times.

40 CFR §63.3890(b)(1) and §63.3900(a)(1)

Compliance Method: Compliance with this limit is demonstrated by compliance with **Conditions F1-11** through **F1-18,** as applicable**,** and maintaining the records required by **Condition F1-9**.

F1-4. The permittee must include all coatings, thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the emission limit in **Condition F1-3**. At the time of permit issuance, the permittee does not have emission capture systems and add-on controls, therefore, the determination must be made using one of the two compliance options listed in paragraphs (a) and (b) of this condition. The permittee may apply either of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. The permittee may use different compliance options for different coating operations, or at different times on the same coating operation. The permittee may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, the permittee may not use different compliance options at the same time on the same coating operation. If the permittee switches between compliance options for any coating operation or group of coating operations, the permittee must document this switch as required by **Condition F1-9(c)** and the permittee must report it in the next semiannual compliance report required in **Condition F1-8.**

(a) ***Compliant material option***. Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the emission limit in **Condition F1-3**, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee must meet all the requirements of **Conditions F1-11** through **F1-16** to demonstrate compliance with the applicable emission limit using this option.
(b) ***Emission rate without add-on controls option***. Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the emission limit in **Condition F1-3**, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee must meet all the requirements of **Conditions F1-17** and **F1-18** to demonstrate compliance with the emission limit using this option.

40 CFR §63.3891(a) and (b)

Compliance Method: Compliance with this condition is assured by the recordkeeping required by **Condition F1-9.**

F1-5. The permittee is not required to meet any operating limits or work practice standards for any coating operation(s) on which the compliant material option or the emission rate without add-on controls option is used.

40 CFR §63.3892(a) and §63.3893(a)

F1-6. At all times, the permittee 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 the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the Technical Secretary 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 affected source.

40 CFR §63.3900(b)

F1-7. The permittee must comply with all applicable requirements of the general provisions as found in Table 2 to Subpart MMMM of Part 63 (see Attachment 2).

40 CFR §63.3901

F1-8. The permittee must submit semiannual compliance reports for each affected source according to the requirements of paragraphs (a) through (f) of this condition.

(a) The permittee must prepare and submit each semiannual compliance report according to the dates specified in paragraphs (a)(1) through (3) of this condition. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
  (1) The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period.
  (2) Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
  (3) Each semiannual compliance report must be postmarked or delivered no later than 60 days after the end of each six-month semiannual reporting period.

(b) The permittee must report all deviations as defined in 40 CFR Part 63 Subpart MMMM in the semiannual monitoring report required by **Condition E2(a)**.

(c) The semiannual compliance report must contain the information specified in paragraphs (c)(1) through (5) below, and the information specified in paragraphs (d) through (f) that is applicable to the permittee's affected source.
  (1) Company name and address.
  (2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
  (3) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
  (4) Identification of the compliance option or options specified in **Condition F1-4** that the permittee used on each coating operation during the reporting period. If the permittee switched between compliance options during the reporting period, the permittee must report the beginning and ending dates for each option the permittee used.
  (5) If the permittee used the emission rate without add-on controls compliance option in **Condition F1-4**, the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.

(d) ***No deviations***. If there were no deviations from the emission limitation in **Condition F1-3**, the semiannual compliance report must include a statement that there were no deviations from the emission limitation during the reporting period.

(e) ***Deviations: Compliant material option***. If the compliant material option was used and there was a deviation from the organic HAP content requirement in **Condition F1-3**, the semiannual compliance report must contain the information in paragraphs (e)(1) through (5) below.
  (1) Identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used.
  (2) The calculation of the organic HAP content (using Equation 2 of **Condition F1-15**) for each coating identified in paragraph (e)(1) of this condition. The permittee does not need to submit background data supporting this calculation (*e.g.*, information provided by coating suppliers or manufacturers, or test reports).
  (3) The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in paragraph (e)(1) of this condition. The permittee does not need to submit background data supporting this calculation (*e.g.*, information provided by material suppliers or manufacturers, or test reports).
  (4) A statement of the cause of each deviation (including unknown cause, if applicable).

(5) The number of deviations, and for each deviation, a list of the affected source or equipment, an estimate of the quantity of each regulated pollutant emitted over the applicable emission limit in **Condition F1-3**, a description of the method used to estimate the emissions, and the actions taken to minimize emissions in accordance with **Condition F1-6**.

(f) ***Deviations: Emission rate without add-on controls option***. If the emission rate without add-on controls option was used and there was a deviation from the emission limit in **Condition F1-3**, the semiannual compliance report must contain the information in paragraphs (f)(1) through (4) below.

(1) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the emission limit in **Condition F1-3**.

(2) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. The permittee must submit the calculations for Equations 1, 1A through 1C, 2, and 3 of **Condition F1-17**; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to **Condition F1-17**. The permittee does not need to submit background data supporting these calculations (*e.g.*, information provided by materials suppliers or manufacturers, or test reports).

(3) A statement of the cause of each deviation (including unknown cause, if applicable).

(4) The number of deviations, and for each deviation, a list of the affected source or equipment, an estimate of the quantity of each regulated pollutant emitted over the applicable emission limit in **Condition F1-3**, a description of the method used to estimate the emissions, and the actions taken to minimize emissions in accordance with **Condition F1-6**.

Required Subpart MMMM reports must be addressed to the Technical Secretary and submitted to the address specified in **Condition E2(c)**.

On and after January 5, 2021, or once the reporting template has been available on the CEDRI website for one year, whichever date is later, the permittee shall submit the semiannual compliance report required by this condition to the EPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (*https://cdx.epa.gov/*). The permittee must use the appropriate electronic template on the CEDRI website for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI website (*https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri*). The date report templates become available will be listed on the CEDRI website. If the reporting form for the semiannual compliance report specific to Subpart MMMM is not available in CEDRI at the time that the report is due, the permittee must submit the report to the Administrator at the appropriate address listed in §63.13. Once the form has been available in CEDRI for one year, the permittee must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in **Condition E2(c)**, regardless of the method in which the reports are submitted. Permittees who claim that some of the information required to be submitted via CEDRI is CBI shall submit a complete report generated using the appropriate form in CEDRI or an alternate electronic file consistent with the XML schema listed on the EPA's CEDRI website, including information claimed to be CBI, on a compact disc, flash drive, or other commonly used electronic storage medium to the EPA. The electronic medium shall be clearly marked as CBI and mailed to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same file with the CBI omitted shall be submitted to the EPA via the EPA's CDX as described earlier in this paragraph.

Reporting during EPA system outages. If the permittee is required to electronically submit a report through the CEDRI in the EPA's CDX, and due to a planned or actual outage of either the EPA's CEDRI or CDX systems within the period of time beginning five business days prior to the date that the submission is due, the permittee will be or is precluded from accessing CEDRI or CDX and submitting a required report within the time prescribed, the permittee may assert a claim of the EPA system outage for failure to timely comply with the reporting requirement. The permittee must submit notification to the Administrator in writing as soon as possible following the date the permittee first knew, or through due diligence should have known, that the event may cause or caused a delay in reporting. The permittee must provide to the Administrator a written description identifying the date, time, and length of the outage; a rationale for attributing the delay in reporting beyond the regulatory deadline to the EPA system outage; describe the measures taken or to be taken to minimize the delay in reporting; and identify a date by which the permittee proposes to report, or if the permittee has already met the reporting requirement at the time of the notification, the date the permittee reported. In any circumstance, the report must be submitted electronically as soon as possible after the outage is resolved. The decision to accept the claim of the EPA system outage and allow an extension to the reporting deadline is solely within the discretion of the Administrator.

Reporting during force majeure events. If the permittee is required to electronically submit a report through CEDRI in the EPA's CDX and a force majeure event is about to occur, occurs, or has occurred or there are lingering effects from such an event within the period of time beginning five business days prior to the date the submission is due, the permittee may assert a claim of force majeure for failure to timely comply with the reporting requirement. For the purposes of this section, a force majeure event is defined as an event that will be or has been caused by circumstances beyond the control of the affected facility, its contractors, or any entity controlled by the affected facility that prevents the permittee from complying with the requirement to submit a report electronically within the time period prescribed. Examples of such events are acts of nature (*e.g.*, hurricanes,

earthquakes, or floods), acts of war or terrorism, or equipment failure or safety hazard beyond the control of the affected facility (*e.g.*, large scale power outage). If the permittee intends to assert a claim of force majeure, the permittee must submit notification to the Administrator in writing as soon as possible following the date the permittee first knew, or through due diligence should have known, that the event may cause or caused a delay in reporting. The permittee must provide to the Administrator a written description of the force majeure event and a rationale for attributing the delay in reporting beyond the regulatory deadline to the force majeure event; describe the measures taken or to be taken to minimize the delay in reporting; and identify a date by which the permittee proposes to report, or if the permittee has already met the reporting requirement at the time of the notification, the date the permittee reported. In any circumstance, the reporting must occur as soon as possible after the force majeure event occurs. The decision to accept the claim of force majeure and allow an extension to the reporting deadline is solely within the discretion of the Administrator.

40 CFR §63.3920(a), (f), (g), and (h)

Compliance Method: Compliance with this condition is assured by submitting the required semiannual reports within the specified timeframe and maintaining the records required by **Condition F1-9.**

F1-9. The permittee must collect and keep records of the data and information specified in paragraphs (a) through (i) of this condition. Failure to collect and keep these records is a deviation from Subpart MMMM and this permit.

(a) A copy of each notification and report that the permittee submitted to comply with Subpart MMMM, and the documentation supporting each notification and report.
(b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If the permittee conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee must keep a copy of the complete test report. If the permittee uses information provided by the manufacturer or supplier of the material that was based on testing, the permittee must keep the summary sheet of results provided by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.
(c) For each compliance period, the records specified in paragraphs (1) through (3) of this condition.
    (1) A record of the coating operations on which the permittee used each compliance option and the time periods (beginning and ending dates and times) for each option used.
    (2) For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of **Condition F1-15**.
    (3) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of **Condition F1-17**; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to **Condition F1-17(e)(4)**; the calculation of the total volume of coating solids used each month using Equation 2 of **Condition F1-17**; and the calculation of each 12-month organic HAP emission rate using Equation 3 of **Condition F1-17**.
(d) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the permittee is using the compliant material option for all coatings at the source, the permittee may maintain purchase records for each material used rather than a record of the volume used.
(e) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight.
(f) A record of the volume fraction of coating solids for each coating used during each compliance period.
(g) When using the emission rate without add-on controls compliance option, the density for each coating, thinner and/or other additive, and cleaning material used during each compliance period.
(h) If using an allowance in Equation 1 of **Condition F1-17** for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to **Condition F1-17(e)(4)**, the permittee must keep records of the information specified in paragraphs (h)(1) through (3) of this condition.
    (1) The name and address of each TSDF to which the permittee sent waste materials for which the permittee uses an allowance in Equation 1 of **Condition F1-17**; a statement of which subparts under 40 CFR Parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment.
    (2) Identification of the coating operations producing waste materials included in each shipment and the month or months in which the permittee used the allowance for these materials in Equation 1 of **Condition F1-17**.
    (3) The methodology used in accordance with **Condition F1-17(e)(4)** to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.

(i) For each deviation from an emission limitation reported under **Condition F1-8(e)** and **(f)**, a record of the information specified in paragraphs (i)(1) through (4) of this condition, as applicable.
(1) The date, time, and duration of the deviation, as reported under **Condition F1-8(e)** and **(f)**.
(2) A list of the affected sources or equipment for which the deviation occurred and the cause of the deviation, as reported under **Condition F1-8(e)** and **(f)**.
(3) An estimate of the quantity of each regulated pollutant emitted over any applicable emission limit in **Condition F1-3**, and a description of the method used the calculate the estimate, as reported under **Condition F1-8(e)** and **(f)**.
(4) A record of actions taken to minimize emissions in accordance with **Condition F1-6** and any corrective actions taken to return the affected unit to its normal or usual manner of operation.

40 CFR §63.3930(a) through (j)

Compliance Method: Compliance with this condition is assured by maintaining the records specified above in accordance with **Condition F1-10**.

F1-10. All records must be in a form suitable and readily available for expeditious review, according to 40 CFR §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. Any records required to be maintained by Subpart MMMM that are in reports that were submitted electronically via the EPA's CEDRI may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to the Technical Secretary or the EPA as part of an on-site compliance evaluation.

As specified in §63.10(b)(1), the permittee must keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee must keep each record on-site for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). The permittee may keep the records off-site for the remaining three years.

40 CFR §63.3931

Compliance Method: Compliance with this condition is assured by maintaining records as described above for the timeframes specified.

Conditions F1-11 through F1-16 only apply if and when the permittee chooses to use the Compliant Material Option as discussed in Condition F1-4.

F1-11. The permittee may use the compliant material option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. The permittee must use the emission rate without add-on controls option for any coating operation in the affected source for which the permittee does not use this option. To demonstrate initial compliance using the compliant material option, the coating operation or group of coating operations must use no coating with an organic HAP content that exceeds the emission limit in **Condition F1-3** and must use no thinner and/or other additive, or cleaning material that contains organic HAP as determined according to **Condition F1-12**. The permittee must meet all the requirements of **Conditions F1-12** through **F1-16**. The procedures in **Conditions F1-12** through **F1-16** must be used on each coating, thinner and/or other additive, and cleaning material in the condition it is in when it is received from its manufacturer or supplier and prior to any alteration. The permittee does not need to redetermine the organic HAP content of coatings, thinners and/or other additives, and cleaning materials that are reclaimed on-site (or reclaimed off-site if the permittee has documentation showing that the permittee received back the exact same materials that were sent off-site) and reused in the coating operation for which the permittee uses the compliant material option, provided these materials in their condition as received were demonstrated to comply with the compliant material option.

40 CFR §63.3941

F1-12. ***Determine the mass fraction of organic HAP for each material used***. The permittee must determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using one of the options in paragraphs (a) through (e) of this condition.

(a) ***Method 311 (Appendix A to 40 CFR Part 63)***. The permittee may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1) and (2) when performing a Method 311 test.
(1) Count each organic HAP in Table 5 to Subpart MMMM that is measured to be present at 0.1 percent by mass or more and at 1.0 percent by mass or more for other compounds. For example, if toluene (not listed in Table 5 to Subpart

MMMM) is measured to be 0.5 percent of the material by mass, it does not have to be counted. Express the mass fraction of each organic HAP counted as a value truncated to four places after the decimal point (*e.g.*, 0.3791).

(2) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (*e.g.*, 0.763).

(b) ***Method 24 (Appendix A to 40 CFR Part 60)***. For coatings, the permittee may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, the permittee may use the alternative method contained in Appendix A to Subpart PPPP of 40 CFR Part 63, rather than Method 24. The permittee may use the volatile fraction that is emitted, as measured by the alternative method in Appendix A to Subpart PPPP of 40 CFR Part 63, as a substitute for the mass fraction of organic HAP.

(c) ***Alternative method.*** The permittee may use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. The permittee must follow the procedure in 40 CFR §63.7(f) to submit an alternative test method for approval.

(d) ***Information from the supplier or manufacturer of the material.*** The permittee may rely on information other than that generated by the test methods specified in paragraphs (a) through (c) of this condition, such as manufacturer's formulation data, if it represents each organic HAP in Table 5 to Subpart MMMM that is present at 0.1 percent by mass or more and at 1.0 percent by mass or more for other compounds. For example, if toluene (not listed in Table 5 to Subpart MMMM) is 0.5 percent of the material by mass, it does not have to be counted. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, the permittee may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is a disagreement between such information and results of a test conducted according to paragraphs (a) through (c) of this condition, then the test method results will take precedence unless, after consultation, the permittee demonstrates to the satisfaction of the Technical Secretary that the formulation data are correct.

(e) ***Solvent blends.*** Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, the permittee may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 3 or 4 to Subpart MMMM (Attachment 3 or 4, respectively). If the tables are used, the permittee must use the values in Table 3 for all solvent blends that match Table 3 entries according to the instructions for Table 3, and the permittee may use Table 4 only if the solvent blends in the materials used do not match any of the solvent blends in Table 3 and the permittee knows only whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (Appendix A to 40 CFR Part 63) test indicate higher values than those listed on Table 3 or 4 to Subpart MMMM, the Method 311 results will take precedence unless, after consultation, the permittee demonstrates to the satisfaction of the Technical Secretary that the formulation data are correct.

40 CFR §63.3941(a)

Compliance Method: Compliance with this condition is assured by determining the mass fraction of HAPs according to one of the methods noted above.

F1-13. ***Determine the volume fraction of coating solids for each coating.*** The permittee must determine the volume fraction of coating solids (gallons of coating solids per gallon of coating) for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation, as specified in paragraphs (a) through (d) of this condition. If test results obtained according to paragraph (a) of this condition do not agree with the information obtained under paragraph (c) or (d) of this condition, the test results will take precedence unless, after consultation, the permittee demonstrates to the satisfaction of the Technical Secretary that the formulation data are correct.

(a) ***ASTM Method D2697-03 (Reapproved 2014) or D6093-97 (Reapproved 2016).*** The permittee may use ASTM Method D2697–03 (Reapproved 2014) (incorporated by reference, see 40 CFR §63.14), or ASTM Method D6093–97 (Reapproved 2016) (incorporated by reference, see §63.14), to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids.

(b) ***Alternative method.*** The permittee may use an alternative test method for determining the solids content of each coating once the Administrator has approved it. The permittee must follow the procedure in 40 CFR §63.7(f) to submit an alternative test method for approval.

(c) ***Information from the supplier or manufacturer of the material.*** The permittee may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer.

(d) ***Calculation of volume fraction of coating solids.*** The permittee may determine the volume fraction of coating solids using Equation 1 of this condition:

$$V_S = 1 - \frac{m_{volatiles}}{D_{avg}} \qquad \text{(Eq. 1)}$$

Where:

V_S = Volume fraction of coating solids, gallons coating solids per gallon coating.

$m_{volatiles}$ = Total volatile matter content of the coating, including HAP, VOC, water, and exempt compounds, determined according to Method 24 in appendix A of 40 CFR part 60, pounds volatile matter per gallon coating.

D_{avg} = Average density of volatile matter in the coating, pounds volatile matter per gallon volatile matter, determined from test results using ASTM Method D1475–13 (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–13 test results and other information sources, the test results will take precedence unless, after consultation the permittee demonstrates to the satisfaction of the Technical Secretary that the formulation data are correct.

40 CFR §63.3941(b)

Compliance Method: Compliance with this condition is assured by following the procedures as noted above.

F1-14. ***Determine the density of each coating.*** Determine the density of each coating used during the compliance period from test results using ASTM Method D1475–13 (incorporated by reference, see 40 CFR §63.14), information from the supplier or manufacturer of the material, or specific gravity data for pure chemicals. If there is disagreement between ASTM Method D1475–13 test results and the supplier's or manufacturer's information, the test results will take precedence unless, after consultation the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct.

40 CFR §63.3941(c)

Compliance method: Compliance with this condition is assured by following the procedures as noted above.

F1-15. ***Determine the organic HAP content of each coating***. Calculate the organic HAP content, pounds of organic HAP emitted per gallon coating solids used, of each coating used during the compliance period using Equation 2 of this condition:

$$H_C = \frac{(D_C)(W_C)}{V_S} \qquad \text{(Eq. 2)}$$

Where:

H_c = Organic HAP content of the coating, pounds organic HAP emitted per gallon coating solids used.

D_c = Density of coating, pounds coating per gallon coating, determined according to **Condition F1-14**.

W_c = Mass fraction of organic HAP in the coating, pounds organic HAP per pounds coating, determined according to Condition **F1-12**.

V_s = Volume fraction of coating solids, gallon coating solids per gallon coating, determined according to **Condition F1-13(d)**.

40 CFR §63.3941(d)

Compliance Method: Compliance with this condition is assured by following the procedures as noted above.

F1-16. To demonstrate continuous compliance, the permittee must do the following:

(a) For each compliance period, use no coating for which the organic HAP content (determined using Equation 2 of Condition **F1-15**) exceeds the emission limit in Condition **F1-3** and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to Condition **F1-12**. A compliance period consists of 12 months. Each month, after the end of the initial compliance period, is the end of a compliance period consisting of that month and the preceding 11 months.

(b) If the permittee chooses to comply with the emission limitation in **Condition F1-3** by using the compliant material option, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified in this condition is a deviation from the emission limitations that must be reported as specified in Condition **F1-8(e)**.

(c) As part of each semiannual compliance report required by **Condition F1-8**, the permittee must identify the coating operation(s) for which the compliant material option was used. If there were no deviations from the emission limit in **Condition F1-3**, submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because no coatings for which the organic HAP content exceeded the emission limit in **Condition F1-3** were used, and no thinner and/or other additive, or cleaning material that contained organic HAP, determined according to **Condition F1-12**, were used.

(d) The permittee must maintain records as specified in Condition **F1-9.**

40 CFR §63.3942

Compliance Method: Compliance with this condition is assured by meeting the requirements as described.

Conditions F1-17 and F1-18 only apply if and when the permittee chooses to use the Emission Rate Without Add-On Controls Option as discussed in Condition F1-4.

F1-17. The permittee may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. The permittee must use the compliant material option for any coating operation in the affected source for which the permittee does not use this option. To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations must meet the applicable emission limit in **Condition F1-3**. When calculating the organic HAP emission rate according to this condition, do not include any coatings, thinners and/or other additives, or cleaning materials used on coating operations for which the compliant material option is used. The permittee does not need to redetermine the mass of organic HAP in coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site (or reclaimed off-site if the permittee has documentation showing that the permittee received back the exact same materials that were sent off-site) and reused in the coating operation for which the emission rate without add-on controls option was used. If the permittee uses coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed.

(a) ***Determine the mass fraction of organic HAP for each material***. Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in **Condition F1-12**.

(b) ***Determine the volume fraction of coating solids***. Determine the volume fraction of coating solids (gallon of coating solids per gallon of coating) for each coating used during each month according to the requirements in **Condition F1-13**.

(c) ***Determine the density of each material***. Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM D1475–13 or ASTM D2111-10 (Reapproved 2015) (both incorporated by reference, see 40 CFR §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If the permittee is including powder coatings in the compliance determination, determine the density of powder coatings, using ASTM D5965–02 (reapproved 2013) (incorporated by reference, see §63.14), or information from the supplier. If there is disagreement between ASTM D1475–13 or ASTM D2111–10 (Reapproved 2015) test results and other such information sources, the test results will take precedence unless, after consultation the permittee demonstrates to the satisfaction of the Technical Secretary that the formulation data are correct. If the permittee purchases materials or monitors consumption by weight instead of volume, the permittee does not need to determine material density. Instead, the permittee may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 of this condition.

(d) ***Determine the volume of each material used***. Determine the volume (gallons) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If the permittee purchases materials or monitors consumption by weight instead of volume, the permittee does not need to determine the volume of each material used. Instead, the permittee may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, and 1C of this condition.

(e) ***Calculate the mass of organic HAP emissions***. The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using Equation 1 of this condition.

$$H_e = A + B + C - R_W \qquad \text{(Eq. 1)}$$

Where:

H_e = Total mass of organic HAP emissions during the month, pounds.

A = Total mass of organic HAP in the coatings used during the month, pounds, as calculated in Equation 1A of this condition.

B = Total mass of organic HAP in the thinners and/or other additives used during the month, pounds, as calculated in Equation 1B of this condition.

C = Total mass of organic HAP in the cleaning materials used during the month, pounds, as calculated in Equation 1C of this condition.

R_W = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, pounds, determined according to paragraph (e)(4) of this condition. (The permittee may assign a value of zero to R_W if the permittee does not wish to use this allowance.)

(1) Calculate the kg organic HAP in the coatings used during the month using Equation 1A of this condition:

$$A = \sum_{i=1}^{m}(Vol_{c,i})(D_{c,i})(W_{c,i}) \qquad \text{(Eq. 1A)}$$

Where:

A = Total mass of organic HAP in the coatings used during the month, pounds.

$Vol_{c,i}$ = Total volume of coating, i, used during the month, gallons.

$D_{c,i}$ = Density of coating, i, pounds coating per gallon coating.

$W_{c,i}$ = Mass fraction of organic HAP in coating, i, pounds organic HAP per pound coating. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in Appendix A to 40 CFR Part 63 Subpart PPPP.

m = Number of different coatings used during the month.

(2) Calculate the pounds of organic HAP in the thinners and/or other additives used during the month using Equation 1B of this condition:

$$B = \sum_{j=1}^{n}(Vol_{t,j})(D_{t,j})(W_{t,j}) \qquad \text{(Eq. 1B)}$$

Where:

B = Total mass of organic HAP in the thinners and/or other additives used during the month, pounds.

$Vol_{t,j}$ = Total volume of thinner and/or other additive, j, used during the month, gallons.

$D_{t,j}$ = Density of thinner and/or other additive, j, pounds per gallon.

$W_{t,j}$ = Mass fraction of organic HAP in thinner and/or other additive, j, pounds organic HAP per pounds thinner and/or other additive. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in Appendix A to 40 CFR Part 63 Subpart PPPP.

n = Number of different thinners and/or other additives used during the month.

(3) Calculate the pounds organic HAP in the cleaning materials used during the month using Equation 1C of this condition:

$$C = \sum_{k=1}^{p}(Vol_{s,k})(D_{s,k})(W_{s,k}) \qquad \text{(Eq. 1C)}$$

Where:

C = Total mass of organic HAP in the cleaning materials used during the month, pounds.

$Vol_{s,k}$ = Total volume of cleaning material, k, used during the month, gallons.

$D_{s,k}$ = Density of cleaning material, k, pounds per gallon.

$W_{s,k}$ = Mass fraction of organic HAP in cleaning material, k, pounds organic HAP per pound material.

p = Number of different cleaning materials used during the month.

(4) If the permittee chooses to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of this condition, then the permittee must determine the mass according to paragraphs (e)(4)(i) through (iv) of this condition.

(i) The permittee may only include waste materials in the determination that are generated by coating operations in the affected source for which the permittee uses Equation 1 of this condition and that will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR Part 262, 264, 265, or 266. The TSDF may be either off-site or on-site. The permittee may not include organic HAP contained in wastewater.

(ii) The permittee must determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. Do not include in the determination any waste materials sent to a TSDF during a month if the permittee has already included them in the amount collected and stored during that month or a previous month.

(iii) Determine the total mass of organic HAP contained in the waste materials specified in paragraph (e)(4)(ii) of this condition.

(iv) The permittee must document the methodology the permittee used to determine the amount of waste materials and the total mass of organic HAP they contain, as required in Condition **F1-9(h)**. If waste manifests include this

information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them.

(f) ***Calculate the total volume of coating solids used***. Determine the total volume of coating solids used, gallons, which is the combined volume of coating solids for all the coatings used during each month, using Equation 2 of this condition:

$$V_{st} = \sum_{i-1}^{m}(Vol_{c,i})(V_{s,i}) \qquad \text{(Eq. 2)}$$

Where:

V_{st} = Total volume of coating solids used during the month, gallons.

$Vol_{c,i}$ = Total volume of coating, i, used during the month, gallons.

$V_{s,i}$ = Volume fraction of coating solids for coating, i, gallon solids per gallon coating, determined according to Condition **F1-13**.

m = Number of coatings used during the month.

(g) ***Calculate the organic HAP emission rate***. Calculate the organic HAP emission rate for the compliance period, pounds organic HAP emitted per gallon coating solids used, using Equation 3 of this condition:

$$H_{yr} = \frac{\sum_{y=1}^{n} H_e}{\sum_{y=1}^{n} V_{st}} \qquad \text{(Eq. 3)}$$

Where:

H_{yr} = Average organic HAP emission rate for the compliance period, pounds organic HAP emitted per gallon coating solids used.

H_e = Total mass of organic HAP emissions from all materials used during month, y, pounds, as calculated by Equation 1 of this condition.

V_{st} = Total volume of coating solids used during month, y, gallons, as calculated by Equation 2 of this condition.

y = Identifier for months.

n = Number of full or partial months in the compliance period (for the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13; for all following compliance periods, n equals 12).

40 CFR §63.3951

Compliance Method: Compliance with this condition is assured by meeting the requirements as described.

F1-18. To demonstrate continuous compliance, the permittee must do the following:

(a) The organic HAP emission rate for each compliance period, determined according to **Condition F1-17**, must be less than or equal to the emission limit in **Condition F1-3F1-3**. A compliance period consists of 12 months. Each month after the end of the initial compliance period is the end of a compliance period consisting of that month and the preceding 11 months. The permittee must perform the calculations in **Condition F1-17(a)** through **(g)** on a monthly basis using data from the previous 12 months of operation.

(b) If the organic HAP emission rate for any 12-month compliance period exceeded the emission limit in **Condition F1-3**, this is a deviation from the emission limitation for that compliance period and must be reported as specified in **Condition F1-8(f)**.

(c) As part of each semiannual compliance report required by **Condition F1-8**, the permittee must identify the coating operation(s) for which the emission rate without add-on controls option was used. If there were no deviations from the emission limitations, the permittee must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in **Condition F1-3**, determined according to Condition **F1-17(a)** through **(g)**.

(d) The permittee must maintain records as specified in **Conditions F1-9** and **F1-10**.

40 CFR §63.3952

Compliance Method: Compliance with this condition is assured by meeting and certifying compliance with the requirements as noted.

F2. TAPCR 1200-03-18-.20 Requirements

F2-1. This facility is subject to and shall comply with all applicable requirements of TAPCR 1200-03-18-.20 - *Coating of Miscellaneous Metal Parts*. This rule applies to any miscellaneous metal parts and products coating line (not covered by other rules of Chapter 18) within a facility whose potential volatile organic compound (VOC) emissions from all miscellaneous metal parts and products coating lines within the facility are equal to or greater than 100 tons of VOCs per year.

Coating means a material applied onto or impregnated into a substrate for protective, decorative, or functional purposes. Such materials include, but are not limited to, paints, varnishes, sealants, adhesives, maskants, and temporary protective coatings.

A coating line means a series of one or more coating applicators and any associated drying area and/or oven wherein a coating is applied, dried, and/or cured. A coating line ends at the point where the coating is dried or cured, or prior to any subsequent application of a different coating.

Coating application with handheld, non-refillable aerosol containers, touch-up markers, or marking pens are not coating operations for the purposes of this rule.

The following sources have been identified as subject to the requirements of TAPCR 1200-03-18-.20.

Source Number	Source Description
03	Two Paint Touch up booths
05	Electrostatic Paint Booths #3 and #4
11	Dip Tank #11
12	Auto Line Touch Up Paint Booth
13	Auto Line Electrostatic Paint Booths (2)
14	Auto Door Touch Up Paint Booth
18	Custom Door Touch Up Paint Booth
07	Adhesive Spray Booth
~~09~~	~~Adhesive Roll Coater~~
21	Adhesive Spray Booth

Commented [JV1]: I guess we missed this one - Rule 20 is all coating, not just spray coating. But remind me if there is another reason we left this one out.

Commented [SK2]: Based on the company e mail dated January 22, 2025

TAPCR 1200-03-18-.01 and 1200-03-18-.20(1)

F2-2. The permittee shall not cause or allow the application of any coating on a miscellaneous metal parts and products coating line with VOC content in excess of the following emission limits excluding water and/or exempt compounds, as applied, on a monthly average basis. If more than one of the following emission limits applies to a specific coating, than the least stringent emission limit shall be applied.

Coating Type	lb/gal
High performance architectural coating	6.2
Heavy-duty truck touch-up	4.8
Clear coating	4.3
Steel pail and drum interior	4.3
Air-dried coating	3.5
Extreme performance coating	3.5
All other coatings	3.0

TAPCR 1200-03-18-.20(3) and (4), 1200-03-18-.02(9)

Compliance Method: The permittee shall use only complying coatings with a VOC content less than the applicable value listed above **or** calculate the monthly average VOC content, in pounds of VOC per gallon of coating (lbs VOC/gallon), excluding water and/or exempt compounds, as applied, during each calendar month, and maintain records of these calculations. If complying by use of complying coatings with a VOC content that doesn't exceed the applicable values listed above, the permittee must maintain a log that clearly identifies the coating type and VOC content, excluding water and/or exempt compounds, as applied, of each coating used. Calculations shall be maintained in a log that contains the following information for all input materials subject to Rule .20 used during each month.

(a) Monthly usage, material density, and VOC content of each input material;
(b) Coating type (s) of each material;
(c) Monthly weighted average VOC emission limit in lbs VOC/gallon excluding water or exempt compounds, as applied, for each subject coating line; and
(d) Monthly weighted average VOC content in lbs VOC/gallon, excluding water and/or exempt compounds, as applied, for each subject coating line.

Logs must be maintained at the source location and kept available for inspection by the Technical Secretary or a Division representative. Logs shall be retained in accordance with **Condition E3-4** of this permit. Logs shall be submitted semiannually in accordance with **Condition E2(a)1**.

Source-Specific Permit Requirements

27-0100-01 Natural Gas-Fired Equipment

This emission source consists of the following natural gas fuel burning equipment:

Stack ID	Emission Unit Description	Heat Input
27-0100-01	Cleaver-Brooks Boiler (MACT DDDDD)	8.0 MMBtu/hr
~~27-0100-08~~	~~Bake Oven~~	~~0.8 MMBtu/hr~~
27-0100-21-IH1	Auto Line - Stage 1 Wash Tank (Immersion Heater) (MACT DDDDD)	3.5 MMBtu/hr
27-0100-21-IH2	Auto Line - Stage 3 Rinse Tank (Immersion Heater) (MACT DDDDD)	2.0 MMBtu/hr
27-0100-21-D	Auto Line - Washer Dry Off Oven	1.5 MMBtu/hr
27-0100-05-D1	Custom Door Line - Paint Bake Oven	3.5 MMBtu/hr
27-0100-05-D2	Custom Door Line - Paint Bake Oven	3.5 MMBtu/hr
27-0100-05-D3	Custom Door Line - Lay Down Washer Dry Off Oven	1.5 MMBtu/hr
27-0100-05-IH1	Custom Door Line - Heated Wash Tank (Immersion Heater) (MACT DDDDD)	5.0 MMBtu/hr
27-0100-05-IH2	Custom Door Line - Stage 1 Wash Tank (Immersion Heater) (MACT DDDDD)	2.0 MMBtu/hr
27-0100-05-IH3	Custom Door Line - Stage 3 Rinse Tank (Immersion Heater) ~~(MACT DDDDD)~~	0.9 MMBtu/hr
27-0100-11-IH1	Frame Dip Paint Line - Stage 1 Wash Tank (Immersion Heater) (MACT DDDDD)	5.0 MMBtu/hr
27-0100-11-D1 27-0100-11-D2	Frame Dip Paint Line - Paint Bake Oven	3.5 MMBtu/hr
27-0100-13-D1 27-0100-13-D2	Auto Line - Paint Bake Oven	2.0 MMBtu/hr
27-0100-16	Pyrolysis Oven	0.38 MMBtu/hr

40 CFR 63, Subpart DDDDD – as noted above

Commented [SK3]: Not in service anymore, e mail dated Jan 22, 2025

Commented [SK4]: Based on company e mail dated Jan 22, 2025

Conditions E4-1 through E4-3 apply to source 27-0100-01

E4-1. Total natural gas usage from all fuel burning equipment listed in Source 27-0100-01 shall not exceed 377.6 million cubic feet during any period of 12 consecutive months.

TAPCR 1200-03-10-.02(2)(a) and Permit 560619

Compliance Method: Compliance with this condition shall be assured by maintaining a log of plant-wide monthly fuel consumption (see example **Log 1** below or use an alternate format which provides the same information) and relevant documentation to support the values recorded in the log (*i.e.*, monthly fuel bill from supplier). All logs and supporting information shall be retained in accordance with **Condition E3-4** of this permit. The log (Log 1) shall be submitted semiannually in accordance with **Condition E2(a)1**.

Log 1: MONTHLY LOG OF NATURAL GAS USAGE FOR ALL EQUIPMENT LISTED IN SOURCE 27-0100-01

Month/Year	Natural Gas Usage Million cubic feet	Natural Gas Usage Per 12-consecutive month Million cubic feet	Initials of Person making log entry

E4-2. Natural gas only shall be used as fuel(s) for this source. Should the permittee need to modify the source to allow the use of a fuel other than natural gas, the permittee shall pursue the appropriate Title V procedure in accordance with TAPCR 1200-03-09-.02(11). If a construction permit is applied for, this shall be done in accordance with TAPCR 1200-03-09-.01.

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

Compliance Method: Compliance with this condition is assured by the recordkeeping required by **Condition E4-1**.

E4-3. Particulate matter (PM), sulfur dioxide (SO_2), volatile organic compounds (VOC), and nitrogen oxides (NO_X) emissions from natural gas fuel consumption in condition **E4-1** shall not exceed the following:

Pollutant	Emission Limit (pounds per hour)	Emission Limit (tons during any period of 12 consecutive months)
PM	25.86	1.41
SO_2	215.5	0.11
VOC	-	1.02
NO_X	-	18.51

TAPCR 1200-03-06-.01(7), 1200-03-06-.02(2)(a), 1200-03-07-.07(2), 1200-03-14-.01(3), 1200-03-14-.02(2)(a), and the agreement letter dated November 19, 2024.

Compliance Method: The permittee shall assure compliance with this condition by compliance with **Conditions E4-1** and **E4-2**.

F3. 40 CFR Part 63, Subpart DDDDD Requirements

F3-1. The permittee is subject to and shall comply with all applicable provisions of 40 CFR 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters* (Subpart DDDDD). Subpart DDDDD applies to each industrial, commercial, or institutional boiler or process heater as defined in §63.7575 that is located at, or is part of, a major source of HAP emissions. The emission units listed in the table below have been identified to be existing affected sources in the subcategory of units designed to burn gas 1 fuels.

Unit ID	Emission Unit Description	Heat Input Capacity (MMBtu/hr)	Status	Subcategory
27-0100-01	Cleaver Brooks boiler	8.0	Existing	Gas 1
27-0100-21-IH1	State 1 Wash Tank	3.5	Existing	Gas 1
27-0100-21-IH2	Heat Stage 3 Rinse Tank	2.0	Existing	Gas 1
27-0100-05-IH1	Heat Wash Tank	5.0	Existing	Gas 1
27-0100-05-IH2	Stage 1 Wash Tank	2.0	Existing	Gas 1
~~27-0100-05-IH3~~	~~Stage 3 Rinse Tank~~	~~0.9~~	~~Existing~~	~~Gas 1~~
27-0100-11-IH1	Stage 1 Wash Tank	5.0	Existing	Gas 1

Commented [SK5]: As per the facility e mail

40 CFR §63.7485, §63.7490(d), and §63.7499(l)

F3-2. At all times, the permittee 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. 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 §63.7500(a)(3)

F3-3. For each new or existing boiler or process heater in the units designed to burn gas 1 fuels subcategory with a heat input capacity of less than or equal to 5 MMBtu/hr, the permittee must conduct a tune-up every five years as specified in paragraphs (a) through (f) of **Condition F3-4.** Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. The permittee may delay the burner inspection specified in **Condition F3-4(a)** until the next scheduled or unscheduled unit shutdown, but each burner must be inspected at least once every 72 months.

For each new or existing boiler or process heater in the unit designed to burn gas 1 subcategory with a heat input capacity of less than 10 MMBtu/hr, but greater than 5 MMBtu/hr, the permittee must conduct a tune-up every two years as specified in paragraphs (a) through (f) of **Condition F3-4.** Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.

40 CFR §63.7500(e), §63.7515(d) ,0§63.7540(a)(11) and (12), and Table 3 to Subpart DDDDD

Compliance Method: Compliance with this requirement is assured by compliance with **Conditions F3-4** through **F3-8**.

F3-4. The permittee must conduct a tune-up of each boiler or process heater on the schedule provided in **Condition F3-3**, as specified in paragraphs (a) through (f) of this condition.

(a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the burner inspection may be performed any time prior to the tune-up or delayed until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
(b) 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;
(c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the inspection may be delayed until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection;
(d) Optimize total emissions of carbon monoxide (CO). This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_X requirement to which the unit is subject;
(e) 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; and
(f) Maintain on-site and submit, if requested by the Technical Secretary, a report containing the following information:
    (1) 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 or process heater;
    (2) A description of any corrective actions taken as a part of the tune-up; and
    (3) The type and amount of fuel used over the 12 months prior to the tune-up, 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 used by each unit.

40 CFR §63.7500(e), §63.7540(a)(11) and (12), and Table 3 to Subpart DDDDD

Compliance Method: Compliance with this requirement is assured by conducting the required tune-ups according to the specified schedule and compliance with **Conditions F3-6 through F3-8**.

F3-5. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.

40 CFR §63.7540(a)(13)

F3-6. The permittee must submit a compliance report every two years or every five years, as applicable, in accordance with §63.7550(a) and (b) and Table 9 to Subpart DDDDD. Compliance reports must cover the applicable 2-year or 5-year reporting periods from January 1 to December 31. Reports must be postmarked or submitted no later than 60 days after the reporting period ends, and must contain the following information, as applicable:

(a) Company and Facility name and address.
(b) Process unit information, emissions limitations, and operating parameter limitations.
(c) Date of report and beginning and ending dates of the reporting period.

(d) Include the date of the most recent tune-up for each unit subject to only the requirement to conduct a biennial or 5-year tune-up according to **Conditions F3-3** and **F3-4**. Include the date of the most recent burner inspection if it was not done biennially, or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown.
(e) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

Required Subpart DDDDD reports should be addressed to the Technical Secretary and submitted to the address listed in **Condition E2(c)**.

Pursuant to §63.7550(h)(3), the permittee must submit all reports required by Table 9 of Subpart DDDDD electronically to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX.) The permittee must use the appropriate electronic report in CEDRI for Subpart DDDDD. Instead of using the electronic report in CEDRI for Subpart DDDDD, the permittee may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (*http://www.epa.gov/ttn/chief/cedri/index.html*), once the XML schema is available. If the reporting form specific to Subpart DDDDD is not available in CEDRI at the time that the report is due, the permittee must submit the report to the EPA Administrator at the appropriate address listed in §63.13. The permittee must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI.

40 CFR §63.7550(a), (b)(1) – (4), (c)(1) and (5), (h)(3), and Table 9 to Subpart DDDDD

Compliance Method: Compliance with this requirement is assured by submitting the required biennial and 5-year compliance reports within the timeframes specified and maintaining records as required in **Conditions F3-7** and **F3-8**.

F3-7. The permittee must keep records according to paragraphs (a) and (b) of this condition.

(a) A copy of each notification and report that was submitted to comply with Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or compliance report that was submitted, according to the requirements in §63.10(b)(2)(xiv).
(b) Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in §63.10(b)(2)(viii).

40 CFR §63.7555(a)

Compliance Method: Compliance with this requirement is assured by maintaining the specified records in accordance with **Condition F3-8.**

F3-8. The permittee must keep records in a form suitable and readily available for expeditious review, according to §63.10(b)(1). As specified in §63.10(b)(1), the permittee must keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee must keep each record on site, or they must be accessible from on site (for example, through a computer network), for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). Records can be kept off site for the remaining three years.

40 CFR §63.7560

F3-9. The permittee must comply with the requirements of 40 CFR Part 63, Subpart A, according to the applicability of 40 CFR Part 63, Subpart A as identified in Attachment 4 of this permit. In the event of a discrepancy between the requirements shown in Attachment 3 and the requirements of Subpart A as published in the Federal Register, the Federal Register language shall be controlling.

40 CFR §63.7565

	Surface Coating Operations: Painting of Steel Doors and Door Frames
27-0100-03	Two Paint Touch up Booths with exhaust filter control (only one booth operates at a time)
27-0100-05	Electrostatic Paint Booths #3 and #4 with exhaust filter control
27-0100-11	Dip Tank #11
27-0100-12	Auto Line Touch Up Paint Booth with exhaust filter control (handheld spray gun)
27-0100-13	Auto Line Electrostatic Paint Booths (2) with exhaust filter control
27-0100-14	Auto Door Touch Up Paint Booth with exhaust filter control (handheld spray gun)
27-0100-18	Custom Door Touch Up Paint Booth with exhaust filter control (hand spray for the edges of doors)
	40 CFR 63, Subpart MMMM and TAPCR 1200-03-18-.20

Conditions E5-1 through E5-2 apply to sources listed above as indicated.

E5-1. Particulate matter emitted from the sources listed below shall not exceed 0.02 grain per dry standard cubic foot.

Emission Source	Equivalent Emission Rate (lbs/hr)
27-0100-03	1.47
27-0100-05	6.14 (1.07 each stack)
27-0100-12	2.49
27-0100-13	2.16 (1.08 each stack)
27-0100-14	2.48
27-0100-18	2.51

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

Compliance Method: The permittee shall operate and maintain exhaust filters in each spray booth listed above. A spray booth shall not operate unless the associated exhaust filters are in place and functioning properly. The permittee shall inspect the filter(s) on a weekly basis prior to starting the booth (see example log [**Log 2**] provided below or use similar log that provides the same required information). The permittee shall initiate corrective action within 24 hours and complete corrective action as expediently as practical if the permittee finds that a problem has developed during an inspection of the exhaust filters. Inspection records, including records of all corrective actions, shall be maintained onsite and shall include the initials of the person performing the inspection(s) and corrective action(s), along with the date, time, and any relevant comments. Days that the source is not in operation shall be noted. These records shall be retained in accordance with **Condition E3-4**. The log (Log 2) shall be submitted semiannually in accordance with **Condition E2(a)1**.

Log 2: WEEKLYEXHAUST FILTER INSPECTION LOG					
Spray Booth ID:					
Date	**Inspection Time**	**Filter In Place (Yes/No)**	**Filter Replaced (Yes/No)**	**Comments/ Corrective Actions**	**Initials of Person making log entry**

E5-2. Volatile organic compounds emitted from plantwide surface coating of metal doors and parts, excluding clean-up solvents, shall not exceed 99.5 tons during any period of 12 consecutive months.

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

Compliance Method: The permittee shall calculate actual quantities of VOC, each individual HAP and total HAP emitted from this process during each month and each period of 12 consecutive months (see example logs [Log #3 and Log #4] provided below or use a similar log that provides the same required information)**.** The logs shall be retained in accordance with **Condition E3-4** of this permit. The logs shall be submitted semiannually in accordance with condition **E2(a)1**.

Log 3: MONTHLY VOC/HAP EMISSIONS LOG FOR COATING OPERATIONS								
MONTH/YEAR:								
MATERIAL NAME	USAGE (gallons/ month)	VOC CONTENT (pounds VOC/ gallon)	VOC EMISSIONS (tons VOC/month)	HAP_i CONTENT (pounds HAP_i / gallon)	HAP_i EMISSIONS (tons HAP_i / month)	HAP_p CONTENT (pounds HAP_p / gallon)	HAP_p EMISSIONS (tons HAP_p /month)	TOTAL HAP EMISSIONS (tons HAP_1 thru HAP_p / month)
TOTAL								

Notes:

1. i = 1, 2, 3... n = the number of different coatings/materials.
2. p = 1, 2, 3... m = the number of different hazardous air pollutants.
3. q = 1, 2, 3... r = the number of different thinners/solvents added to coatings.
4. Add rows as needed for the number of different coatings or thinners/solvents and columns as needed for the number of different hazardous air pollutants.

Log 4: 12 CONSECUTIVE MONTH VOC/HAP EMISSIONS LOG FOR COATING OPERATIONS			
MONTH/YEAR	VOC Emissions (tons VOC per month)	VOC Emissions (tons VOC per 12 months)[1]	TOTAL HAP Emissions (tons HAP_1 thru HAP_p per month)[2]

1. The Tons per 12 Month value is the sum of the VOC (or HAP) emissions in the 11 months preceding the month just completed + the VOC (or HAP) emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this log, this value will be equal to the value for tons per month. For the second month, it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed, that is, 6 (2) represents 6 tons emitted in 2 months.
2. These values are added together only for the Fee Accounting Period, which begins on July 1 of any given calendar year and ends on June 30 of the next calendar year.

Adhesive Application Operations: Assembly of Steel Doors

27-0100-07 Adhesive Spray Booth with exhaust filter control

27-0100-09 Adhesive Roll Coater

27-0100-21 Adhesive Spray Booth with exhaust filter control

40 CFR 63, Subpart MMMM and TAPCR 1200-03-18-.20 are applicable to Source 07 and Source 21

Commented [SK6]: I specified the sources that are subject to the MACT and Chapter 18, hope thats ok. Thanks

Conditions E6-1 through E6-2 apply to sources listed above as indicated.

E6-1. Particulate matter emitted from the sources listed below shall not exceed 0.02 grain per dry standard cubic foot.

Emission Source	Equivalent Emission Rate (lbs/hr)
27-0100-07	2.06
27-0100-21	1.81

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

Compliance Method: The permittee shall operate and maintain exhaust filters in each spray booth listed above. A spray booth shall not operate unless the exhaust filters are in place and functioning properly. The permittee shall inspect the filter(s) on a weekly basis prior to starting the booth (see example log [Log 5] provided below or use similar log that provides the same

required information). The permittee shall initiate corrective action within 24 hours and complete corrective action as expediently as practical if the permittee finds that a problem has developed during an inspection of the exhaust filters. Inspection records, including records of all corrective actions, shall be maintained onsite and shall include the initials of the person performing the inspection(s) and corrective action(s), along with the date, time, and any relevant comments. Days that the source is not in operation shall be noted. These records shall be retained in accordance with **Condition E3-4**. The log (**Log 5**) shall be submitted semiannually in accordance with condition **E2(a)1**.

Log 5: WEEKLY EXHAUST FILTER INSPECTION LOG					
Spray Booth ID:					
Date	**Inspection Time**	**Filter In Place (Yes/No)**	**Filter Replaced (Yes/No)**	**Comments/ Corrective Actions**	**Initials of Person making log entry**

E6-2. Volatile organic compounds emitted from adhesive application operations shall not exceed 119.0 tons during any period of 12 consecutive months.

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

Compliance Method: The permittee shall calculate actual quantities of VOC, each individual HAP and total HAP emitted from this process during each month and each period of 12 consecutive months (see example log [Log 6 and Log 7] provided below or use similar log that provides the same required information)**.** The logs shall be retained in accordance with **Condition E3-4** of this permit. The logs shall be submitted semiannually in accordance with condition **E2(a)1**.

Log 6: MONTHLY VOC/HAP EMISSIONS LOG FOR ADHESIVE COATING OPERATIONS								
MONTH AND YEAR:								
MATERIAL NAME	USAGE (gallons/ month)	VOC CONTENT (pounds VOC/ gallon)	VOC EMISSIONS (tons VOC/month)	HAP_1 CONTENT (pounds HAP_1 / gallon)	HAP_1 EMISSIONS (tons HAP_1 / month)	HAP_p CONTENT (pounds HAP_p / gallon)	HAP_p EMISSIONS (tons HAP_p /month)	TOTAL HAP EMISSIONS (tons HAP_1 thru HAP_p / month)
TOTAL								

Notes:
1. i = 1, 2, 3... n = the number of different adhesive
2. p = 1, 2, 3... m = the number of different hazardous air pollutants.
3. q = 1, 2, 3... r = the number of different thinners/solvents added to coatings.
4. Use rows as required for the number of different adhesives or thinners/solvents and columns as required for the number of different hazardous air pollutants.

Log 7: 12- CONSECUTIVE MONTH VOC/HAP EMISSIONS FOR ADHESIVE OPERATION			
MONTH/YEAR	VOC Emissions from Coatings (tons VOC per month)	VOC Emissions (tons VOC per 12 months)[1]	TOTAL HAP Emissions (tons HAP_1 thru HAP_p per month)[2]

1. The Tons per 12 Month value is the sum of the VOC (or HAP) emissions in the 11 months preceding the month just completed + the VOC (or HAP) emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this log, this value will be equal to the value for tons per month. For the second month, it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed, that is, 6 (2) represents 6 tons emitted in 2 months.
2. These values are added together only for the Fee Accounting Period, which begins on July 1 of any given calendar year and ends on June 30 of the next calendar year.

END OF THE TITLE V PERMIT 578717

ATTACHMENT 1

OPACITY MATRIX DECISION TREE for VISIBLE EMISSION EVALUATION EPA METHOD 9 Dated June 18, 1996 and Amended September 11, 2013

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

Notes:

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

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

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

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

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

Typical Pollutants
Particulates, VOC, CO, SO_2, NO_x, HCl, HF, HBr, Ammonia, and Methane.

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

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

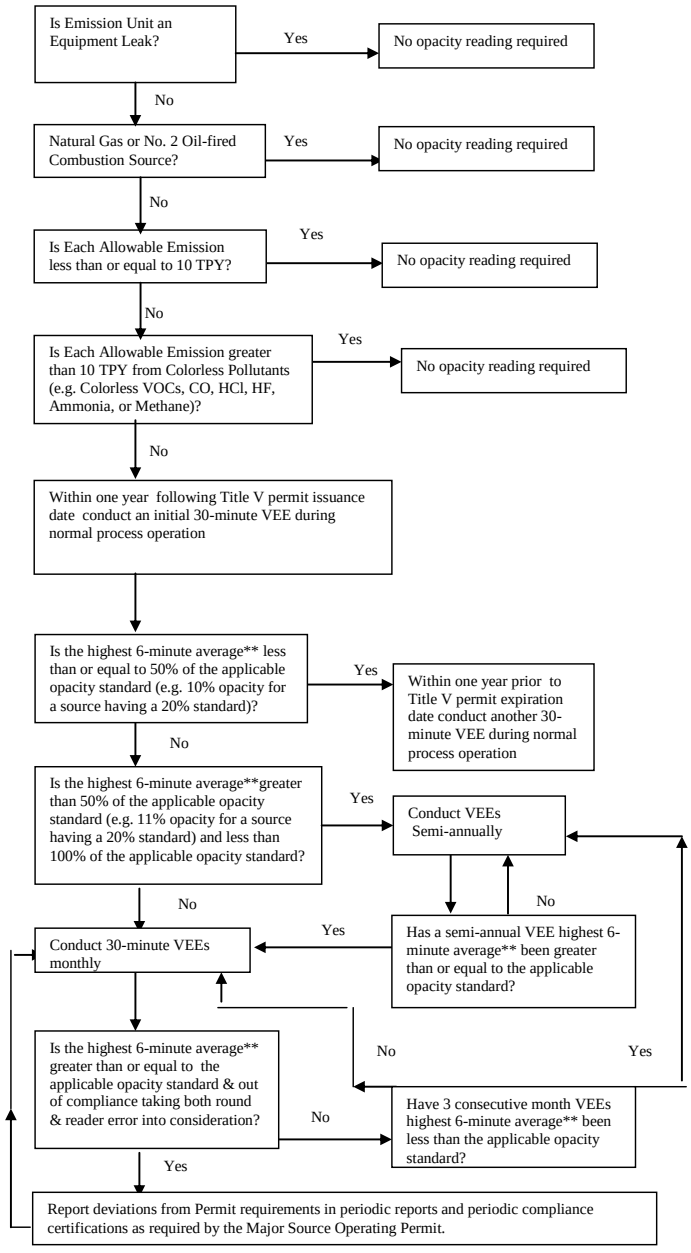
Reader Error
EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards:
The TAPCD guidance is to declares non-compliance when the highest six-minute average** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

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

*Not applicable to Asbestos manufacturing subject to 40 CFR 61.142

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

Dated June 18, 1996
Amended September 11, 2013



ATTACHMENT 2
TABLES to 40 CFR 63, Subpart MMMM

~~Table 1 to Subpart MMMM of Part 63 - Operating Limits if Using the Emission Rate with Add-On Controls Option~~

Table 2 to Subpart MMMM of Part 63 - Applicability of General Provisions to Subpart MMMM of Part 63

Table 3 to Subpart MMMM of Part 63 - Default Organic HAP Mass Fraction for Solvents and Solvent Blends

Table 4 to Subpart MMMM of Part 63 - Default Organic HAP Mass Fraction for Petroleum Solvent Groups[a]

Table 5 to Subpart MMMM of Part 63 - List of HAP That Must be Counted Toward Total Organic HAP Content if Present at 0.1 Percent or More by Mass

Commented [JV7]: This table is not referenced in the portion of the rule listed in the permit. It isn't listed in the Table of Contents, either. It should be removed.

Table 5 is referenced and should be added here and in the TOC.

Table 1 to Subpart MMMM of Part 63 — Operating Limits if Using the Emission Rate with Add-On Controls Option

If you are required to comply with operating limits by §63.3892(c), you must comply with the applicable operating limits in the following table:

For the following device…	You must meet the following operating limit…	And you must demonstrate continuous compliance with the operating limit by…
1. Thermal oxidizer	a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to §63.3967(a)	i. Collecting the combustion temperature data according to §63.3968(c); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average combustion temperature at or above the temperature limit.
2. Catalytic oxidizer	a. The average temperature measured just before the catalyst bed in any 3-hour period must not fall below the limit established according to §63.3967(b) (for magnet wire coating machines, temperature can be monitored before or after the catalyst bed); and either	i. Collecting the temperature data according to §63.3968(c); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average temperature before (or for magnet wire coating machines after) the catalyst bed at or above the temperature limit.
—	b. Ensure that the average temperature difference across the catalyst bed in any 3-hour period does not fall below the temperature difference limit established according to §63.3967(b) (2); or	i. Collecting the temperature data according to §63.3968(c); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average temperature difference at or above the temperature difference limit.
—	c. Develop and implement an inspection and maintenance plan according to §63.3967(b)(4) or for magnet wire coating machines according to section 3.0 of appendix A to this subpart	i. Maintaining and up-to-date inspection and maintenance plan, records of annual catalyst activity checks, records of monthly inspections of the oxidizer system, and records of the annual internal inspections of the catalyst bed. If a problem is discovered during a monthly or annual inspection required by §63.3967(b)(4) or for magnet wire coating machines by section 3.0 of appendix A to this subpart, you must take corrective action as soon as practicable consistent with the manufacturer's recommendations.
3. Regenerative carbon adsorber	a. The total regeneration desorbing gas (*e.g.*, steam or nitrogen) mass flow for each carbon bed regeneration cycle must not fall below the total regeneration desorbing gas mass flow limit established according to §63.3967(c); and	i. Measuring the total regeneration desorbing gas (*e.g.*, steam or nitrogen) mass flow for each regeneration cycle according to §63.3968(d); and ii. Maintaining the total regeneration desorbing gas mass flow at or above the mass flow limit.
—	b. The temperature of the carbon bed, after completing each regeneration and any cooling cycle, must not exceed the carbon bed temperature limit established according to §63.3967(c)	i. Measuring the temperature of the carbon bed after completing each regeneration and any cooling cycle according to §63.3968(d); and ii. Operating the carbon beds such that each carbon bed is not returned to service until completing each regeneration and any cooling cycle until the recorded temperature of the carbon bed is at or below the temperature limit.
4. Condenser	a. The average condenser outlet (product side) gas temperature in any 3-hour period must not exceed the temperature limit established according to §63.3967(d)	i. Collecting the condenser outlet (product side) gas temperature according to §63.3968(e); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average gas temperature at the outlet at or below the temperature limit.
5. Concentrators, including zeolite wheels and rotary carbon adsorbers	a. The average gas temperature of the desorption concentrate stream in any 3-hour period must not fall below the limit established according to §63.3967(e); and	i. Collecting the temperature data according to 63.3968(f); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average temperature at or above the temperature limit.

For the following device…	You must meet the following operating limit…	And you must demonstrate continuous compliance with the operating limit by…
—	b. The average pressure drop of the dilute stream across the concentrator in any 3-hour period must not fall below the limit established according to §63.3967(e)	i. Collecting the pressure drop data according to 63.3968(f); ii. Reducing the pressure drop data to 3-hour block averages; and iii. Maintaining the 3-hour average pressure drop at or above the pressure drop limit.
6. Emission capture system that is a PTE according to §63.3965(a)	a. The direction of the air flow at all times must be into the enclosure; and either	i. Collecting the direction of air flow, and either the facial velocity of air through all natural draft openings according to §63.3968(b)(1) or the pressure drop across the enclosure according to §63.3968(g)(2); and ii. Maintaining the facial velocity of air flow through all natural draft openings or the pressure drop at or above the facial velocity limit or pressure drop limit, and maintaining the direction of air flow into the enclosure at all times.
—	b. The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minutes; or	i. See items 6.a.i and 6.a.ii.
—	c. The pressure drop across the enclosure must be at least 0.007 inch H_2O, as established in Method 204 of appendix M to 40 CFR part 51	i. See items 6.a.i and 6.a.ii.
7. Emission capture system that is not a PTE according to §63.3965(a)	a. The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to §63.3967(f)	i. Collecting the gas volumetric flow rate or duct static pressure for each capture device according to §63.3968(g); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average gas volumetric flow rate or duct static pressure for each capture device at or above the gas volumetric flow rate or duct static pressure limited.

Table 2 to Subpart MMMM of Part 63—Applicability of General Provisions to Subpart MMMM of Part 63

You must comply with the applicable General Provisions requirements according to the following table:

Citation	Subject	Applicable to Subpart MMMM	Explanation
§63.1(a)(1)-(14)	General Applicability	Yes	
§63.1(b)(1)-(3)	Initial Applicability Determination	Yes	Applicability to subpart MMMM is also specified in §63.3881.
§63.1(c)(1)	Applicability After Standard Established	Yes	
§63.1(c)(2)-(3)	Applicability of Permit Program for Area Sources	No	Area sources are not subject to subpart MMMM.
§63.1(c)(4)-(5)	Extensions and Notifications	Yes	
§63.1(c)(6)	Reclassification	Yes	
§63.1(e)	Applicability of Permit Program Before Relevant Standard is Set	Yes	
§63.2	Definitions	Yes	Additional definitions are specified in §63.3981.
§63.1(a)-(c)	Units and Abbreviations	Yes	
§63.4(a)(1)-(5)	Prohibited Activities	Yes	
§63.4(b)-(c)	Circumvention/Severability	Yes	

Citation	Subject	Applicable to Subpart MMMM	Explanation
§63.5(a)	Construction/Reconstruction	Yes	
§63.5(b)(1)-(6)	Requirements for Existing Newly Constructed, and Reconstructed Sources	Yes	
§63.5(d)	Application for Approval of Construction/Reconstruction	Yes	
§63.5(e)	Approval of Construction/Reconstruction	Yes	
§63.5(f)	Approval of Construction/Reconstruction Based on Prior State Review	Yes	
§63.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	Yes	
§63.6(b)(1)-(7)	Compliance Dates for New and Reconstructed Sources	Yes	Section 63.3883 specifies the compliance dates.
§63.6(c)(1)-(5)	Compliance Dates for Existing Sources	Yes	Section 63.3883 specifies the compliance dates.
§63.6(e)(1)-(2)	Operation and Maintenance	No	*See* §63.3900(b) for general duty requirement.
§63.6(e)(3)	SSMP	No	
§63.6(f)(1)	Compliance Except During SSM	No	
§63.6(f)(2)-(3)	Methods for Determining Compliance.	Yes	
§63.6(g)(1)-(3)	Use of an Alternative Standard	Yes	
§63.6(h)	Compliance With Opacity/Visible Emission Standards	No	Subpart MMMM does not establish opacity standards and does not require continuous opacity monitoring systems (COMS).
§63.6(i)(1)-(16)	Extension of Compliance	Yes	
§63.6(j)	Presidential Compliance Exemption	Yes	
§63.7(a)(1)	Performance Test Requirements—Applicability	Yes	Applies to all affected sources. Additional requirements for performance testing are specified in §§63.3964, 63.3965, and 63.3966.
§63.7(a)(2)	Performance Test Requirements—Dates	Yes	Applies only to performance tests for capture system and control device efficiency at sources using these to comply with the standard. Section 63.3960 specifies the schedule for performance test requirements that are earlier than those specified in §63.7(a)(2).
§63.7(a)(3)-(4)	Performance Tests Required By the Administrator, Force Majeure	Yes	
§63.7(b)-(d)	Performance Test Requirements—Notification, Quality Assurance, Facilities Necessary for Safe Testing, Conditions During Test	Yes	Applies only to performance tests for capture system and add-on control device efficiency at sources using these to comply with the standard.
§63.7(e)(1)	Conduct of Performance Tests	No	*See* §§63.3964.
§63.7(e)(2)-(4)	Conduct of Performance Tests	Yes	
§63.7(f)	Performance Test Requirements—Use of Alternative Test Method	Yes	Applies to all test methods except those used to determine capture system efficiency.
§63.7(g)-(h)	Performance Test Requirements—Data Analysis, Recordkeeping, Reporting, Waiver of Test	Yes	Applies only to performance tests for capture system and add-on control device efficiency at sources using these to comply with the standard.
§63.8(a)(1)-(3)	Monitoring Requirements—Applicability	Yes	Applies only to monitoring of capture system and add-on control device efficiency at sources using these to comply with the standard. Additional requirements for monitoring are specified in §63.3968.

Citation	Subject	Applicable to Subpart MMMM	Explanation
§63.8(a)(4)	Additional Monitoring Requirements	No	Subpart MMMM does not have monitoring requirements for flares.
§63.8(b)	Conduct of Monitoring	Yes	
§63.8(c)(1)	Continuous Monitoring System (CMS) Operation and Maintenance	No	Section 63.3968 specifies the requirements for the operation of CMS for capture systems and add-on control devices at sources using these to comply.
§63.8(c)(2)-(3)	CMS Operation and Maintenance	Yes	Applies only to monitoring of capture system and add-on control device efficiency at sources using these to comply with the standard. Additional requirements for CMS operations and maintenance are specified in §63.3968.
§63.8(c)(4)	CMS	No	§63.3968 specifies the requirements for the operation of CMS for capture systems and add-on control devices at sources using these to comply.
§63.8(c)(5)	COMS	No	Subpart MMMM does not have opacity or visible emission standards.
§63.8(c)(6)	CMS Requirements	No	Section 63.3968 specifies the requirements for monitoring systems for capture systems and add-on control devices at sources using these to comply.
§63.8(c)(7)	CMS Out-of-Control Periods	Yes	
§63.8(c)(8)	CMS Out-of-Control Periods and Reporting	No	§63.3920 requires reporting of CMS out-of-control periods.
§63.8(d)-(e)	Quality Control Program and CMS Performance Evaluation	No	Subpart MMMM does not require the use of continuous emissions monitoring systems.
§63.8(f)(1)-(5)	Use of an Alternative Monitoring Method	Yes	
§63.8(f)(6)	Alternative to Relative Accuracy Test	No	Subpart MMMM does not require the use of continuous emissions monitoring systems.
§63.8(g)(1)-(5)	Data Reduction	No	Sections 63.3967 and 63.3968 specify monitoring data reduction.
§63.9(a)-(d)	Notification Requirements	Yes	
§63.9(e)	Notification of Performance Test	Yes	Applies only to capture system and add-on control device performance tests at sources using these to comply with the standard.
§63.9(f)	Notification of Visible Emissions/Opacity Test	No	Subpart MMMM does not have opacity or visible emissions standards.
§63.9(g)(1)-(3)	Additional Notifications When Using CMS	No	Subpart MMMM does not require the use of continuous emissions monitoring systems.
§63.9(h)	Notification of Compliance Status	Yes	Section 63.3910 specifies the dates for submitting the notification of compliance status.
§63.9(i)	Adjustment of Submittal Deadlines	Yes	
§63.9(j)	Change in Previous Information	Yes	
§63.9(k)	Electronic reporting procedures	Yes	Only as specified in §63.9(j).
§63.10(a)	Recordkeeping/Reporting—Applicability and General Information	Yes	
§63.10(b)(1)	General Recordkeeping Requirements	Yes	Additional requirements are specified in §§63.3930 and 63.3931.
§63.10(b)(2)(i)-(ii)	Recordkeeping of Occurrence and Duration of Startups and Shutdowns and of Failures to Meet Standards	No	*See* §63.3930(j).

Citation	Subject	Applicable to Subpart MMMM	Explanation
§63.10(b)(2)(iii)	Recordkeeping Relevant to Maintenance of Air Pollution Control and Monitoring Equipment	Yes	§63.10(b)(2)(iii).
§63.10(b)(2)(iv)-(v)	Actions Taken to Minimize Emissions During SSM	No	*See* §63.3930(j) for a record of actions taken to minimize emissions duration a deviation from the standard.
§63.10(b)(2)(vi)	Recordkeeping for CMS Malfunctions	No	*See* §63.3930(j) for records of periods of deviation from the standard, including instances where a CMS is inoperative or out-of-control.
§63.10(b)(2)(xii)	Records	Yes	
§63.10(b)(2)(xiii)		No	Subpart MMMM does not require the use of continuous emissions monitoring systems.
§63.10(b)(2)(xiv)		Yes	
§63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	
§63.10(c)(1)-(6)	Additional Recordkeeping Requirements for Sources with CMS	Yes	
§63.10(c)(7)-(8)	Additional Recordkeeping Requirements for Sources with CMS	No	*See* §63.3930(j) for records of periods of deviation from the standard, including instances where a CMS is inoperative or out-of-control.
§63.10(c)(10)-(14)	Additional Recordkeeping Requirements for Sources with CMS	Yes	
§63.10(c)(15)	Records Regarding the SSMP	No	
§63.10(d)(1)	General Reporting Requirements	Yes	Additional requirements are specified in §63.3920.
§63.10(d)(2)	Report of Performance Test Results	Yes	Additional requirements are specified in §63.3920(b) and (d).
§63.10(d)(3)	Reporting Opacity or Visible Emissions Observations	No	Subpart MMMM does not require opacity or visible emissions observations.
§63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	Yes	
§63.10(d)(5)	SSM Reports	No	*See* §63.3920 (a)(7) and (c).
§63.10(e)(1)-(2)	Additional CMS Reports	No	Subpart MMMM does not require the use of continuous emissions monitoring systems.
§63.10(e)(3)	Excess Emissions/CMS Performance Reports	No	Section 63.3920(b) specifies the contents of periodic compliance reports.
§63.10(e)(4)	COMS Data Reports	No	Subpart MMMMM does not specify requirements for opacity or COMS.
§63.10(f)	Recordkeeping/Reporting Waiver	Yes	
§63.11	Control Device Requirements/Flares	No	Subpart MMMM does not specify use of flares for compliance.
§63.12	State Authority and Delegations	Yes	
§63.13	Addresses	Yes	
§63.14	IBR	Yes	
§63.15	Availability of Information/Confidentiality	Yes	

Table 3 to Subpart MMMM of Part 63 - Default Organic HAP Mass Fraction for Solvents and Solvent Blends

The permittee may use the mass fraction values in the following table for solvent blends for which the permittee does not have test data or manufacturer's formulation data and which match either the solvent blend name or the chemical abstract series (CAS) number. If a solvent blend matches both the name and CAS number for an entry, that entry's organic HAP mass fraction must be used for that solvent blend. Otherwise, use the organic HAP mass fraction for the entry matching either the solvent blend name or CAS number, or use the organic HAP mass fraction from Table 4 to Subpart MMMM if neither the name or CAS number match.

Solvent/solvent blend	CAS. No.	Average organic HAP mass fraction	Typical organic HAP, percent by mass
1. Toluene	108-88-3	1.0	Toluene
2. Xylene(s)	1330-20-7	1.0	Xylenes, ethylbenzene
3. Hexane	110-54-3	0.5	n-hexane
4. n-Hexane	110-54-3	1.0	n-hexane
5. Ethylbenzene	100-41-4	1.0	Ethylbenzene
6. Aliphatic 140		0	None
7. Aromatic 100		0.02	1% xylene, 1% cumene
8. Aromatic 150		0.09	Naphthalene
9. Aromatic naphtha	64742-95-6	0.02	1% xylene, 1% cumene
10. Aromatic solvent	64742-94-5	0.1	Naphthalene
11. Exempt mineral spirits	8032-32-4	0	None
12. Ligroines (VM & P)	8032-32-4	0	None
13. Lactol spirits	64742-89-6	0.15	Toluene
14. Low aromatic white spirit	64742-82-1	0	None
15. Mineral spirits	64742-88-7	0.01	Xylenes
16. Hydrotreated naphtha	64742-48-9	0	None
17. Hydrotreated light distillate	64742-47-8	0.001	Toluene
18. Stoddard solvent	8052-41-3	0.01	Xylenes
19. Super high-flash naphtha	64742-95-6	0.05	Xylenes
20. Varsol® solvent	8052-49-3	0.01	0.5% xylenes, 0.5% ethylbenzene
21. VM & P naphtha	64742-89-8	0.06	3% toluene, 3% xylene
22. Petroleum distillate mixture	68477-31-6	0.08	4% naphthalene, 4% biphenyl

Table 4 to Subpart MMMM of Part 63 - Default Organic HAP Mass Fraction for Petroleum Solvent Groups[a]

The permittee may use the mass fraction values in the following table for solvent blends for which the permittee does not have test data or manufacturer's formulation data.

Solvent Type	Average Organic HAP Mass Fraction	Typical Organic HAP Percent by Mass
Aliphatic[b]	0.03	1% xylene, 1% toluene, and 1% ethylbenzene
Aromatic[c]	0.06	4% xylene, 1% toluene, and 1% ethylbenzene

[a] Use this table only if the solvent blend does not match any of the solvent blends in Table 3 of Attachment 4 by either solvent blend name or CAS number and you only know whether the blend is aliphatic or aromatic.

[b] Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naphtha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.

[c] Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.

Table 5 to Subpart MMMM of Part 63 – List of HAP That Must be Counted Toward Total Organic HAP Content if Present at 0.1 Percent or More by Mass

Chemical Name	CAS No.
1,1,2,2-Tetrachloroethane	79-34-5
1,1,2-Trichloroethane	79-00-5
1,1-Dimethylhydrazine	57-14-7
1,2-Dibromo-3-chloropropane	96-12-8
1,2-Diphenylhydrazine	122-66-7
1,3-Butadiene	106-99-0
1,3-Dichloropropene	542-75-6
1,4-Dioxane	123-91-1
2,4,6-Trichlorophenol	88-06-2
2,4/2,6-Dinitrotoluene (mixture)	25321-14-6
2,4-Dinitrotoluene	121-14-2
2,4-Toluene diamine	95-80-7
2-Nitropropane	79-46-9
3,3′-Dichlorobenzidine	91-94-1
3,3′-Dimethoxybenzidine	119-90-4
3,3′-Dimethylbenzidine	119-93-7
4,4′-Methylene bis(2-chloroaniline)	101-14-4
Acetaldehyde	75-07-0
Acrylamide	79-06-1
Acrylonitrile	107-13-1
Allyl chloride	107-05-1
alpha-Hexachlorocyclohexane (a-HCH)	319-84-6
Aniline	62-53-3
Benzene	71-43-2
Benzidine	92-87-5
Benzotrichloride	98-07-7
Benzyl chloride	100-44-7
beta-Hexachlorocyclohexane (b-HCH)	319-85-7
Bis(2-ethylhexyl)phthalate	117-81-7
Bis(chloromethyl)ether	542-88-1
Bromoform	75-25-2
Captan	133-06-2
Carbon tetrachloride	56-23-5
Chlordane	57-74-9
Chlorobenzilate	510-15-6
Chloroform	67-66-3
Chloroprene	126-99-8
Cresols (mixed)	1319-77-3
DDE	3547-04-4
Dichloroethyl ether	111-44-4
Dichlorvos	62-73-7
Epichlorohydrin	106-89-8

Chemical Name	CAS No.
Ethyl acrylate	140-88-5
Ethylene dibromide	106-93-4
Ethylene dichloride	107-06-2
Ethylene oxide	75-21-8
Ethylene thiourea	96-45-7
Ethylidene dichloride (1,1-Dichloroethane)	75-34-3
Formaldehyde	50-00-0
Heptachlor	76-44-8
Hexachlorobenzene	118-74-1
Hexachlorobutadiene	87-68-3
Hexachloroethane	67-72-1
Hydrazine	302-01-2
Isophorone	78-59-1
Lindane (hexachlorocyclohexane, all isomers)	58-89-9
m-Cresol	108-39-4
Methylene chloride	75-09-2
Naphthalene	91-20-3
Nitrobenzene	98-95-3
Nitrosodimethylamine	62-75-9
o-Cresol	95-48-7
o-Toluidine	95-53-4
Parathion	56-38-2
p-Cresol	106-44-5
p-Dichlorobenzene	106-46-7
Pentachloronitrobenzene	82-68-8
Pentachlorophenol	87-86-5
Propoxur	114-26-1
Propylene dichloride	78-87-5
Propylene oxide	75-56-9
Quinoline	91-22-5
Tetrachloroethene	127-18-4
Toxaphene	8001-35-2
Trichloroethylene	79-01-6
Trifluralin	1582-09-8
Vinyl bromide	593-60-2
Vinyl chloride	75-01-4
Vinylidene chloride	75-35-4

ATTACHMENT 3

Table 10 to Subpart DDDDD of Part 63 - Applicability of General Provisions to Subpart DDDDD

Table 10 to Subpart DDDDD of Part 63—Applicability of General Provisions to Subpart DDDDD

As stated in §63.7565, you must comply with the applicable General Provisions according to the following:

Citation	Subject	Applies to subpart DDDDD
§63.1	Applicability	Yes.
§63.2	Definitions	Yes. Additional terms defined in §63.7575
§63.3	Units and Abbreviations	Yes.
§63.4	Prohibited Activities and Circumvention	Yes.
§63.5	Preconstruction Review and Notification Requirements	Yes.
§63.6(a), (b)(1)-(b)(5), (b)(7), (c)	Compliance with Standards and Maintenance Requirements	Yes.
§63.6(e)(1)(i)	General duty to minimize emissions.	No. See §63.7500(a)(3) for the general duty requirement.
§63.6(e)(1)(ii)	Requirement to correct malfunctions as soon as practicable.	No.
§63.6(e)(3)	Startup, shutdown, and malfunction plan requirements.	No.
§63.6(f)(1)	Startup, shutdown, and malfunction exemptions for compliance with non-opacity emission standards.	No.
§63.6(f)(2) and (3)	Compliance with non-opacity emission standards.	Yes.
§63.6(g)	Use of alternative standards	Yes, except §63.7555(d)(13) specifies the procedure for application and approval of an alternative timeframe with the PM controls requirement in the startup work practice (2).
§63.6(h)(1)	Startup, shutdown, and malfunction exemptions to opacity standards.	No. See §63.7500(a).
§63.6(h)(2) to (h)(9)	Determining compliance with opacity emission standards	No. Subpart DDDDD specifies opacity as an operating limit not an emission standard.
§63.6(i)	Extension of compliance	Yes. Note: Facilities may also request extensions of compliance for the installation of combined heat and power, waste heat recovery, or gas pipeline or fuel feeding infrastructure as a means of complying with this subpart.
§63.6(j)	Presidential exemption.	Yes.
§63.7(a), (b), (c), and (d)	Performance Testing Requirements	Yes.
§63.7(e)(1)	Conditions for conducting performance tests	No. Subpart DDDDD specifies conditions for conducting performance tests at §63.7520(a) to (c).
§63.7(e)(2)-(e)(9), (f), (g), and (h)	Performance Testing Requirements	Yes.
§63.8(a) and (b)	Applicability and Conduct of Monitoring	Yes.
§63.8(c)(1)	Operation and maintenance of CMS	Yes.
§63.8(c)(1)(i)	General duty to minimize emissions and CMS operation	No. See §63.7500(a)(3).
§63.8(c)(1)(ii)	Operation and maintenance of CMS	Yes.
§63.8(c)(1)(iii)	Startup, shutdown, and malfunction plans for CMS	No.
§63.8(c)(2) to (c)(9)	Operation and maintenance of CMS	Yes.
§63.8(d)(1) and (2)	Monitoring Requirements, Quality Control Program	Yes.
§63.8(d)(3)	Written procedures for CMS	Yes, except for the last sentence, which refers to a startup, shutdown, and

Citation	Subject	Applies to subpart DDDDD
		malfunction plan. Startup, shutdown, and malfunction plans are not required.
§63.8(e)	Performance evaluation of a CMS	Yes.
§63.8(f)	Use of an alternative monitoring method.	Yes.
§63.8(g)	Reduction of monitoring data	Yes.
§63.9	Notification Requirements	Yes.
§63.10(a), (b)(1)	Recordkeeping and Reporting Requirements	Yes.
§63.10(b)(2)(i)	Recordkeeping of occurrence and duration of startups or shutdowns	Yes.
§63.10(b)(2)(ii)	Recordkeeping of malfunctions	No. See §63.7555(d)(7) for recordkeeping of occurrence and duration and §63.7555(d)(8) for actions taken during malfunctions.
§63.10(b)(2)(iii)	Maintenance records	Yes.
§63.10(b)(2)(iv) and (v)	Actions taken to minimize emissions during startup, shutdown, or malfunction	No.
§63.10(b)(2)(vi)	Recordkeeping for CMS malfunctions	Yes.
§63.10(b)(2)(vii) to (xiv)	Other CMS requirements	Yes.
§63.10(b)(3)	Recordkeeping requirements for applicability determinations	No.
§63.10(c)(1) to (9)	Recordkeeping for sources with CMS	Yes.
§63.10(c)(10) and (11)	Recording nature and cause of malfunctions, and corrective actions	No. See §63.7555(d)(7) for recordkeeping of occurrence and duration and §63.7555(d)(8) for actions taken during malfunctions.
§63.10(c)(12) and (13)	Recordkeeping for sources with CMS	Yes.
§63.10(c)(15)	Use of startup, shutdown, and malfunction plan	No.
§63.10(d)(1) and (2)	General reporting requirements	Yes.
§63.10(d)(3)	Reporting opacity or visible emission observation results	No.
§63.10(d)(4)	Progress reports under an extension of compliance	Yes.
§63.10(d)(5)	Startup, shutdown, and malfunction reports	No. See §63.7550(c)(11) for malfunction reporting requirements.
§63.10(e)	Additional reporting requirements for sources with CMS	Yes.
§63.10(f)	Waiver of recordkeeping or reporting requirements	Yes.
§63.11	Control Device Requirements	No.
§63.12	State Authority and Delegation	Yes.
§63.13-63.16	Addresses, Incorporation by Reference, Availability of Information, Performance Track Provisions	Yes.
§63.1(a)(5),(a)(7)-(a)(9), (b)(2), (c)(3)-(4), (d), 63.6(b)(6), (c)(3), (c)(4), (d), (e)(2), (e)(3)(ii), (h)(3), (h)(5)(iv), 63.8(a)(3), 63.9(b)(3), (h)(4), 63.10(c)(2)-(4), (c)(9).	Reserved	No.

ATTACHMENT 4
TITLE V FEE SELECTION FORM (APC 36)

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
Telephone: (615) 532-0554, Email: Air.Pollution.Control@TN.gov

APC 36

TITLE V FEE SELECTION

Type or print and submit to the email address above.

FACILITY INFORMATION

1. Organization's legal name and SOS control number [as registered with the TN Secretary of State (SOS)]	
2. Site name (if different from legal name)	
3. Site address (St./Rd./Hwy.)	County name
City	Zip code
4. Emission source reference number	**5.** Title V permit number

FEE SELECTION

This fee selection is effective beginning January 1, _____. When approved, this selection will be effective until a new Fee Selection form is submitted. Fee Selection forms must be submitted on or before December 31 of the annual accounting period.

6. Payment Schedule (choose one):

Calendar Year Basis (January 1 – December 31) ☐ Fiscal Year Basis (July 1 – June 30) ☐

7. Payment Basis (choose one):

Actual Emissions Basis ☐ Allowable Emissions Basis ☐ Combination of Actual and Allowable Emissions Basis ☐

8. If Payment Basis is "Actual Emissions" or "Combination of Actual and Allowable Emissions", complete the following table for each permitted source and each pollutant for which fees are due for that source. See instructions for further details.

Source ID	Pollutant	Allowable or Actual Emissions	If allowable emissions: Specify condition number and limit. If actual emissions: Describe calculation method and provide example. Provide condition number that specifies method, if applicable.

APC 36

8. (Continued)

Source ID	Pollutant	Allowable or Actual Emissions	If allowable emissions: Specify condition number and limit. If actual emissions: Describe calculation method and provide example. Provide condition number that specifies method, if applicable.

CONTACT INFORMATION (BILLING)

9. Billing contact			Phone number with area code
Mailing address (St./Rd./Hwy.)			Fax number with area code
City	State	Zip code	**Email address**

SIGNATURE BY RESPONSIBLE OFFICIAL

Based upon information and belief formed after reasonable inquiry, I, as the responsible person of the above mentioned facility, certify that the information contained in the submittal is accurate and true to the best of my knowledge. As specified in TCA Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

10. Signature		Date
Signer's name (type or print)	**Title**	Phone number with area code

TITLE V PERMIT RENEWAL STATEMENT

Facility Name: AADG, Inc. dba Ceco Door
City: Milan
County: Gibson

Date Application Received: 12/07/2020 and 02/23/2024 (full application update)
Date Application Deemed Complete: 12/07/2020

Emission Source Reference No.: **27-0100**
Permit No.: 578717

INTRODUCTION

This narrative is being provided to assist the reader in understanding the content of the attached Title V operating permit. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-03-09-.02(11)(f)1(v). The primary purpose of the Title V operating permit is to consolidate and identify existing state and federal air requirements applicable to AADG, Inc. dba Ceco Door and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit Renewal. It initially describes the facility renewing 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

Fabrication and Surface Coating of Steel Doors

1. List and describe emission sources included in the permit:

27-0100-01: Natural Gas Fuel Fired Equipment
27-0100-03: Two Paint Touch up Booths (only one booth operates at a time)
27-0100-05: Electrostatic paint booths
27-0100-07: Adhesive Coating Line
27-0100-09: Adhesive Coating Line
27-0100-11: Paint Dip line
27-0100-12: Paint Touch-up
27-0100-13: Electrostatic paint booth
27-0100-14: Paint Touch-up
27-0100-16: Pyrolysis Oven
27-0100-18: Paint Touch-up
27-0100-21: Auto Door Adhesive Application

2. Insignificant Activities

Insignificant Activity/Emission Unit Description	**Applicable Rule Citation**
Closed Cell Urethane Foam In steel Door-Auto	1200-03-09-.04(5)(a)(4)(i)
Closed Cell Urethane Foam In steel Door-Custom	1200-03-09-.04(5)(a)(4)(i)
Four Emergency generator engines (Emission Source 27-0100-24)	1200-03-09-.04(5)(a)(4)(i)

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*. (this means that the facility is not located within a national park or national wilderness area; see 40 CFR 52.21(e) for complete definition)

C. Regulatory Status

1. PSD/NSR
   This facility *is not* a major source under PSD.

2. Title V Major Source Status by Pollutant

Pollutant	**Is the pollutant emitted?**	**If emitted, what is the facility's status?**	
		Major Source Status	**Non-Major Source Status**
PM	Yes	Yes	No
PM_{10}	Yes	No	Yes
SO_2	Yes	No	Yes
VOC	Yes	Yes	No
NO_X	Yes	No	Yes
CO	Yes	No	Yes
Individual HAP	Yes	Yes	No
Total HAPs	Yes	Yes	No

3. MACT Standards

This facility *is* a major source for HAPs. This facility is subject to the following MACT standards:

- 40 CFR 63, Subpart MMMM - *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*

  Subpart MMMM applies to all surface coating operations (Sources 03, 05, 11, 12, 13, 14, and 18) and two of the three adhesive application operations (Sources 07 and 21). Source 09, Adhesive Roll Coater, is a custom door and auto line operation where a water-based glue is roll-applied to honeycomb material made of fibrous cellulose (Email from Jenna Schoonheim, dated January 29, 2025). Therefore, Subpart MMMM does not apply to Source 09.

- 40 CFR 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*

  The following boilers and process heaters are subject to Subpart DDDDD:

Unit ID	Emission Unit Description	Heat Input Capacity (MMBtu/hr)	Status	Subcategory
27-0100-01	Cleaver Brooks boiler	8.0	Existing	Gas 1
27-0100-21-IH1	State 1 Wash Tank	3.5	Existing	Gas 1
27-0100-21-IH2	Heat Stage 3 Rinse Tank	2.0	Existing	Gas 1
27-0100-05-IH1	Heat Wash Tank	5.0	Existing	Gas 1
27-0100-05-IH2	Stage 1 Wash Tank	2.0	Existing	Gas 1
27-0100-11-IH1	Stage 1 Wash Tank	5.0	Existing	Gas 1

  It has been determined that Unit ID 27-0100-05-IH3, an immersion heater in the Stage 3 Rinse Tank on the Custom Door Line (rated at 0.9MMBtu/hr), is not subject to Subpart DDDDD because it meets the definition of a hot water boiler (included in the definition of hot water heater in §63.7575).

- 40 CFR 63, Subpart ZZZZ – *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* (Four emergency engines – designated insignificant activities, see table below)

4. Program Applicability

Are the following programs applicable to the facility?

PSD *(no)*

NESHAP *(yes)* – See MACT Standards above

NSPS *(no)* – The following emergency engines are not subject to 40 CFR 60, Subpart JJJJ because each emergency engine was manufactured (or installed) before January 1, 2009.

Source Number	Site ID	Engine Make/Model	Engine hp	Manufacture Date	Installation Date
27-0100-24	Unit #1	Ford Power Products/ LRG4251-6005-A	38	Before July 12, 1996	Pre 1/1/2001
	Unit #2	Ford Power Products/ LRG4251-6005-A	38		May 2006
	Unit #3	Ford Power Products/ LRG4251-6005-A	38		August 2007
	Unit #4	Ford Power Products	65	Before July 12, 1996	August 2001

CAM *(no)* - Potential pre-control emissions of applicable pollutants from controlled emission units are less than 100 percent of the major source amount. All the Paint Spray booths for surface coating operations (Sources 03, 05, 12, 13, 14, and18) and the Adhesive Spray Booths (Sources 07 and 21) have exhaust filters as emission control.

II. Compliance Information

A. Compliance Status

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

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. Title V Permit History

The initial Title V Permit (548015) was issued on January 20, 1999.
The first Title V Renewal Permit (560619) was issued on October 15, 2010.
The second Title V Renewal Permit (570158) was issued on June 21, 2016.
This is the third Title V Renewal Permit for this facility.

A. Changes/updates in this permit renewal

1. The permit shell was updated to the current format used for Title V permits. Some conditions under the General Permit conditions Section A-D have been updated as per the new template.
2. The Title V renewal addresses the facility request to remove Source No. 27-0100-22 – Honeycomb Expander. Per information provided by the facility on October 29, 2024, the honeycomb expander remains onsite, but the facility has discontinued use of chemicals containing phenol and formaldehyde, and heat is no longer used in the process. Additional information provided on November 20, 2024, states that the honeycomb materials is now purchased from a manufacturer offsite, and curing is performed by that manufacturer. The honeycomb expander is still in operation at the site however, the process only involves stretching of the material without the use of heat.
3. The permit renewal also addresses the facility request to remove Source No. 27-0100-24- Four emergency NG fired emergency engines from the permit and classify them as insignificant sources.
4. Condition E1 was revised to update allowable emissions in the Fee emissions summary table and new APC address.
5. MACT standards for 40 CFR 63, Subpart MMMM - *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products* (Section F1) have been updated to reflect the current version.
6. TAPCR 1200-03-18-.20 - *Coating of Miscellaneous Metal Parts* (Section F2) requirements have been added. Previous permits limited emissions from the spray coating operations to avoid applicability of Rule 20. However, two adhesive application operations (Sources 07 and 21) also apply coatings (adhesives) to metal substrates. When potential VOC emissions from all miscellaneous metal parts and products coating lines at the facility are combined, the potential is greater than 100 tons per year.
7. MACT standards for 40 CFR 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters* (Section F3) have been updated to reflect the current version.
8. Updated the list of sources and added the specs for the four NG fired insignificant emergency engines and their NSPS/NESHAP applicability in a table in the Statement of Basis.
9. The Allowable/Potential Emission table in the Statement of Basis for this renewal has been revised to reflect all the changes made in this permit.

V. Allowable / Potential Emissions

Emissions from the facility at the time of Title V Renewal issuance

Tons per Year of Allowable or Potential Emissions						
Source Number	**PM**	**SO_2**	**VOC**	**NOx**	**CO**	**Total HAP**
27-0100-01						
01 Cleaver-Brooks Boiler	0.26	0.021	0.19	3.44	2.89	0.06
08 Bake Oven	0.03	0.002	0.02	0.34	0.29	0.01
21-IH1 Stage 1 Wash Tank	0.11	0.009	0.08	1.50	1.26	0.03
21-IH2 Stage 3 Rinse Tank	0.07	0.005	0.05	0.86	0.72	0.02
21-D1 Dry Off Oven	0.05	0.004	0.04	0.64	0.54	0.01
05-D1 Paint Bake Oven	0.11	0.009	0.08	1.50	1.26	0.03
05-D2 Paint Bake Oven	0.11	0.009	0.08	1.50	1.26	0.03
05-D3 Dry Off Oven	0.05	0.004	0.04	0.64	0.54	0.01
05-IH1 Wash Tank	0.16	0.013	0.12	2.15	1.80	0.04
05-IH2 Stage 1 Wash Tank	0.07	0.005	0.05	0.86	0.72	0.02
05-IH3 Stage 3 Rinse Tank	0.03	0.002	0.02	0.39	0.32	0.01
11-D1 Paint Bake Oven	0.11	0.009	0.08	1.50	1.26	0.03
11-IH Stage 1 Wash Tank	0.16	0.013	0.12	2.15	1.80	0.04
13-D1 Paint Bake Oven	0.07	0.005	0.05	0.86	0.72	0.02
16 Pyrolysis Oven	0.01	0.001	0.01	0.17	0.14	0.00
Subtotal (27-0100-01)	**1.41**	**0.11**	**1.02**	**18.51**	**15.55**	**0.35**
27-0100-03	6.40	--	99.5	--	--	12.12
27-0100-05	26.80	--		--	--	
27-0100-11	--	--		--	--	
27-0100-12	10.90	--		--	--	
27-0100-13	9.40	--		--	--	
27-0100-14	10.86	--		--	--	
27-0100-18	10.99	--		--	--	
27-0100-07	9.02	--	119.0	--	--	49.86
27-0100-09	--	--		--	--	
27-0100-21	7.92	--		--	--	
Insignificant Activities	0.00	0.00	0.01	0.31	0.04	0.00
Plantwide Total[1]	93.92	0.11	219.61	20.15		
Permit Allowable	93.92	0.11	219.60	19.84		

[1] Plant-wide total emissions include emissions from insignificant activities.

VI. Public Participation Procedures

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

1. U.S. EPA Region IV
2. State of Kentucky
3. State of Arkansas
4. State of Missouri

VII. Dates of Public Comment and EPA review periods

EPA concurrent review requested _____
Public Notice publication date _____
Public Notice period completion date _____
Public Notice publication comments _____
EPA Notification date _____
EPA review period completion date _____
EPA review comments received _____
Final Permit issuance date _____