PUBLIC NOTICE

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

The applicant is **Foam Fabricators, Inc** with a site address of 24 College Park Cove. They have applied for renewal of their existing major source (Title V) operating permit for their expandable polystyrene manufacturing operation.

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 permits are available for public inspection during normal business hours at the following locations:

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
Jackson Environmental Field Office
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 permits 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 sources may be addressed to Katherine Stephens at (615) 339-2921 or by e-mail at katherine.stephens@tn.gov.

Interested parties are invited to review these materials and comment. In addition, a public hearing may be requested at which written or oral presentations may be made. To be considered, written comments or requests for a public hearing must be received no later than 4:30 PM on **July 21, 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) 532-0200. 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. The permittee has been granted permission to operate an air contaminant source in accordance with emissions limitations and monitoring requirements set forth herein.

Issue Date: TBD

Permit Number: 580745

Expiration Date: TBD

Issued To:
Foam Fabricators, Inc

Installation Address:
24 College Park Cove
Jackson

Installation Description:
01: Expansion/Molding of Polystyrene Beads
05: 10.5 MMBtu/hr Natural Gas-fired Boiler NSPS Subpart Dc

Emission Source Reference No.: 57-0221

Renewal Application Due Date: Between TBD and TBD

Primary SIC: 30

Information Relied Upon:
Title V Renewal application dated August 15, 2022.

(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

RDA-1298

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

PERMIT NUMBER 580745

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 fee in accordance with TAPCR 1200-03-26-.02(9) based upon the applicable base fee; the applicable permit modification fee(s); 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 the applicable base fee; the applicable permit modification fee(s); and 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. Emissions of hazardous air pollutants (HAP) that are included in the particulate matter (including PM_{10}) category or the volatile organic compound category shall be included in those categories.

2. HAP that are not included in either the particulate matter category or volatile organic compound category shall be included in the category of Hazardous Air Pollutants Not Included Above.

3. Each individual HAP is subject to the 4,000 ton cap provisions of TAPCR subparagraph 1200-03-26-.02(2)(i).

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

(e) Emissions of pollutants that do not fall in one of the listed categories shall be included in the category of Miscellaneous Pollutants Not Listed Above. Each miscellaneous pollutant is subject to the 4,000-ton cap provisions.

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. §68201-109 (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 120003-09.02(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. 68201109 or other compelling reasons that public welfare is being adversely affected by the operation of a source that is in compliance with its permit requirements.

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

1. The Technical Secretary shall, within 90 days after receipt of such notification, forward to EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate. If the Administrator grants additional time to secure permit applications or additional information from the permittee, the Technical Secretary shall have the additional time period added to the standard 90-day time period.

2. EPA will evaluate the Technical Secretary's proposed revisions and respond as to their evaluation.

3. If EPA agrees with the proposed revisions, the Technical Secretary shall proceed with the reopening in the same manner prescribed under **Condition A13(b)** and **Condition A13(c)**.

4. If the Technical Secretary disagrees with either the findings or the Administrator that a permit should be reopened or an objection of the Administrator to a proposed revision to a permit submitted pursuant to **Condition A13(d)**, he shall bring the matter to the Board at its next regularly scheduled meeting for instructions as to how he should proceed. The permittee shall be required to file a written brief expressing their position relative to the Administrator's objection and have a responsible official present at the meeting to answer questions for the Board. If the Board agrees that EPA is wrong in their demand for a permit revision, they shall instruct the Technical Secretary to conform to EPA's demand, but to issue the permit under protest preserving all rights available for litigation against EPA.

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

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

(a) Transfer of ownership permit application is filed consistent with the provisions of 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 120003-09.02(11)(e)6 for such revisions made pursuant to item (c) of this condition which meet the relevant requirements of TAPCR subparagraph 120003-09.02(11)(e), TAPCR subparagraph 120003-09.02(11)(f) and TAPCR subparagraph 120003-09.02(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 120003-09.02(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 nonportable 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. **Maintenance and Repair of Sources.** 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

57-0221	**Facility Description:**	Foam Fabricators, Inc manufactures expandable polystyrene for use in packaging, componentry, and proprietary products.

Conditions E1, E2, and E3 apply to all sources in **Section E** of this permit unless otherwise noted.

E1. Fee payment.

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 57-0221

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	0.35	**AEAR**	N/A
SO_2	0.04	**AEAR**	N/A
VOC	240.30	**AEAR**	N/A
NOx	4.60	**AEAR**	N/A
Facility-Wide Total HAP Limit	N/A	**AEAR**	N/A
Facility-Wide Individual HAP Limit	N/A	**AEAR**	N/A
HAZARDOUS AIR POLLUTANTS (HAPs) NOT INCLUDED ABOVE*			
	N/A	**AEAR**	N/A
MISCELLANEOUS POLLUTANTS 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 **AAP** at the time of permit renewal issuance began **July 1, 2025,** and ends **June 30, 2026**. The next AAP begins **July 1, 2026,** and ends **June 30, 2027,** 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 (Attachment 2) 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 [PM], SO_2, VOC, NO_X and so forth. See TAPCR 1200-03-26-.02(2)(i) for the definition of a regulated pollutant.),

(2) the "**HAP Not Included Above" Category (non-VOC and non-PM HAP not included in a facility-wide limit)**, and

(3) the **Miscellaneous Category**

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

* **Hazardous Air Pollutants Not Included Above:** This category is made-up of hazardous air pollutants that are not included in the VOC or PM category, such as HCl and HF, and are not included in a facility-wide HAP emission limitation. **For fee computation**, each individual hazardous air pollutant is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

** **Miscellaneous Pollutants Not Listed Above:** This category is for pollutants that are not included in one of the other categories but for which an emission limitation has been established in this permit (including NSPS pollutants). **For fee computation**, each pollutant in this category is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

END NOTES

The permittee shall:

(1) Pay Title V **annual fees** (including the emissions fee, base fee, significant modification fee, & minor modification fee), 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)(a). 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 fees on an allowable emissions basis: pay annual fees for each AAP no later than April 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d).
TAPCR 1200-03-26-.02(9)(a)2(i)

(3) Sources paying annual fees on a calendar year basis and an actual or mixed emissions basis: pay annual allowable based emission fees for each AAP no later than April 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d), except as allowed by TAPCR 1200-03-26-.02(9)(g)3.
TAPCR 1200-03-26-.02(9)(a)2(ii)

(4) Sources paying annual fees on a fiscal year basis and an actual or mixed emissions basis: for each AAP, pay an estimated 65% of the fee due no later than April 1 of the current fiscal year. The remainder of the fee for each annual accounting period is due no later than August 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d), except as allowed by TAPCR 1200-03-26-.02(9)(g)3.
TAPCR 1200-03-26-.02(9)(a)2(iii)

(5) Sources paying annual 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 Fee Year 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**.
TAPCR 1200-03-26-.02(9)(g)2

(6) Sources paying annual fees on a Fee Choice of 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 Year 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 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).

TAPCR 1200-03-26-.02(9)(g)2

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

TAPCR 1200-03-26-.02(9)(g)2

(8) Include with each required AEAR report the following statement signed by the Responsible Official: *"I have reviewed this document in its entirety, and to the best of my knowledge, based on information and belief formed after reasonable inquiry, the statements and information contained in this document are true, accurate, and complete."*

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

The annual fee due dates are specified in TAPCR 1200-03-26-.02(9)(a) 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:
Tennessee Department of Environment and Conservation
Division of Fiscal Services
Consolidated Fee Section – APC
Davy Crockett Tower, 6th Floor
500 James Robertson Parkway
Nashville, Tennessee 37243

and

Actual Emissions Analyses to:
A "Title V Emissions Summary Form" and the AEAR must be submitted electronically as directed by the Division. Additional information can be found at https://www.tn.gov/environment/air/inventory.html

TAPCR 1200-03-26-.02(3), (8), and (9), and TAPCR 1200-03-09-.02(11)(e)1(vii)

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** of each calendar year 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
572557	July 1, 2025	***Day before permit issuance
580745	***Day of permit issuance	December 31, 2025

1. Any monitoring and recordkeeping required by **Condition E4-1** and **Condition E5-8** of this permit. 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 1200-03-09-.02(11)(e)1.(iii)

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

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

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

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

Annual compliance certifications shall cover the 12-month period from **January 1** to **December 31** of each calendar year 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
572557	January 1, 2025	***Day before permit issuance
580745	***Day of permit issuance	December 31, 2025

These certifications shall be submitted to: TN APCD and EPA

Division of Air Pollution Control
Jackson Environmental Field Office
1625 Hollywood Drive
Jackson, TN 38305
APC.JackEFO@tn.gov

and

EPA Air Enforcement Branch
U. S. EPA Region IV
61 Forsyth Street, SW
Atlanta, Georgia 30303
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 and TAPCR 1200-03-09-.02(11)(e)3.(v)

(c) **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 Facility Conditions.

E3-1. As-Supplied VOC and HAP Content. The as-supplied VOC content of all VOC-containing materials (all coatings, inks, adhesives, thinners, and solvents) to be used by this source shall be determined from Safety Data Sheets (SDS) or manufacturer or vendor formulation data which explicitly list the VOC content by weight. If new materials are used, or if material formulation is changed, logs used to calculate emissions of VOC shall be updated within 30 days from the initial date of usage of the new or altered material.

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

Compliance Method: Purchase orders and/or invoices for all VOC-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 content by weight for all VOC-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 in accordance with **Condition E2(c)**. Scanned documents (maintained electronically) may be used to fulfill this requirement.

E3-2. Visible Emissions Evaluation: General Requirements.

(a) 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. A stack is defined as any chimney, flue, conduit, exhaust, vent, or opening of any kind whatsoever, capable of, or used for, the emission of air contaminants.

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

Compliance Method: If required, the permittee shall certify compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996 (amended on September 11, 2013) that is enclosed in **Attachment 1**. Visible emissions from sources at this facility shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average). 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.

(b) 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. Reasonable precautions shall include, but are not 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.

The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five minutes per hour or 20 minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in TAPCR 1200-03-20. A malfunction is defined as, any sudden and unavoidable failure of process equipment or for a process to operate in an abnormal and unusual manner. Failures that are caused by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

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

Compliance Method: When required to demonstrate compliance, fugitive emissions shall be determined by Tennessee Visible Emissions Evaluation Method 4 as adopted by the Tennessee Air Pollution Control Board on April 16, 1986.

(c) Fugitive emissions from roads and parking areas shall not exhibit greater than 10% opacity.

TAPCR 1200-03-08-.03

Compliance Method: When required to demonstrate compliance, fugitive emissions from roads and parking areas shall be determined by utilizing Tennessee Visible Emissions Evaluation (TVEE) Method 1, as adopted by the Tennessee Air Pollution Control Board on April 29, 1982, as amended on September 15, 1982, and August 24, 1984.

E3-3. Recordkeeping: Data Entry Requirements

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

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

E3-4. The permittee shall maintain and repair the emission source, associated air pollution control device(s), and compliance assurance monitoring equipment as required to maintain and assure compliance with the specified emission limits.

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

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

E3-5. Identification of Responsible Official, Technical Contact, and Billing Contact

(a) The Responsible Official for the facility is Donnie Burns, Corporate EHS Director of the permitted facility. If this person (Donnie Burns) 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 Principal Technical Contact for the permitted facility is Cody Denevan. 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 Billing Contact for the permitted facility is Cody Denevan. 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.

E4. Specific permit conditions for 57-0221-01, Source 01: Expansion/Molding of Polystyrene Beads

Expansion/molding of polystyrene beads using pentane as a blowing agent, consisting of pre-expanders, bag storage, molding machines, and warehouse storage.

E4-1. The total volatile organic compounds (VOC) emitted from this source shall not exceed 240.0 tons during any period of 12-consecutive months. This limit was taken to avoid PSD (Prevention of Significant Air Quality Deterioration).

TAPCR 1200-03-07-.07(2), TAPCR, 1200-03-09-.01(4), and the agreement letter dated May 28, 2025 (**Attachment 3).**

Compliance Method: The permittee shall calculate the actual quantity of VOC emitted during each calendar month and each period of 12-consecutive months in the log below, or in an alternative format, which provides the same information. The log shall be retained in accordance with **Condition E2(c).**

Month/year	**Bead Lot No.**	**Raw Material**		**Monthly VOC Emissions ***		**Consecutive 12-month VOC Emissions**
Month		Pounds of Raw Material (beads) processed	Weight % of Pentane in bead lot	Pounds of VOC emitted	Tons of VOC emitted	(**) Tons of VOC emitted per 12-month period
January						
February						
March						
etc.						

(*) Actual VOC emission rate each month is calculated by multiplying the pounds of raw polystyrene beads processed by the weight percent of pentane of the respective bead lots. One hundred percent loss of the pentane (VOC) shall be assumed due to the evaporative loss during sequential operations previously described encompassing processing, storage, and handling.

(**) The Tons per 12-month value is the VOC emissions in the 11 months preceding the month just completed + VOC 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. The second month will be the sum of the first month and the second month. Indicate in parentheses the number of months summed, e.g. 6 (2) represents 6 tons emitted in 2 months.

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.

TAPCR 1200-03-010-.02(2)(a)

E5. Specific permit conditions for 57-0221-05, Source 05: 10.5 MMBtu/hr Natural Gas-fired Boiler

10.5 MMBtu/hr natural gas-fired primary boiler, ID #BL01, subject to NSPS Subpart Dc

E5-1. The design heat input rate of this source is 10.5 MMBtu/hr. Should the permittee need to modify this source in a manner that increases the design heat input rate a construction permit or Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.01 and TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

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

Compliance Method: The permittee shall maintain documentation to demonstrate the heat input rate for the source. Documentation shall include, but is not limited to, manufacturer's specifications, purchase records, operating manuals, or a tag

affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

E5-2. Only natural gas shall be used as fuel for the source. Should the permittee need to modify the source to allow the use of a fuel other than natural gas, a construction permit or Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.01 and TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

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

Compliance Method: Compliance with this condition shall be demonstrated through the recordkeeping requirements outlined in **Condition E5-8**.

E5-3. Particulate matter (PM) emitted from this source shall not exceed 0.08 pounds per hour on a daily average basis.

TAPCR 1200-03-06-.01(7) and the agreement letter dated May 28, 2025 (**Attachment 3**).

Compliance Method: Compliance with the PM emission limitation shall be assured by compliance with **Conditions E5-1 and E5-2**, and the PM emission factor of 7.6 lbs/10^6 scf from AP-42, Chapter 1.4, Table 1.4-2, 7/98 (Natural Gas Combustion).

E5-4. Sulfur dioxide (SO_2) emitted from this source shall not exceed 0.01 pounds per hour on a daily average basis.

TAPCR 1200-03-14-.01(3) and the agreement letter dated May 28, 2025 (**Attachment 3**).

Compliance Method: Compliance with the SO_2 emission limitation shall be assured by compliance with **Conditions E5-1 and E5-2**, and the SO_2 emission factor of 0.6 lbs/10^6 scf from AP-42, Chapter 1.4, Table 1.4-2, 7/98 (Natural Gas Combustion).

E5-5. Carbon monoxide (CO) emitted from this source shall not exceed 3.9 tons during any period of 12-consecutive months.

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

Compliance Method: Compliance with the CO emission limitation shall be assured by compliance with **Conditions E5-1 and E5-2**, and the CO emission factor of 84 lbs/10^6 scf from AP-42, Chapter 1.4, Table 1.4-1, 7/98 (Natural Gas Combustion).

E5-6. Volatile organic compounds (VOC) emitted from this source shall not exceed 0.3 tons during any period of 12-consecutive months.

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

Compliance Method: Compliance with the VOC emission limitation shall be assured by compliance with **Conditions E5-1 and E5-2**, and the VOC emission factor of 5.5 lbs/10^6 scf from AP-42, Chapter 1.4, Table 1.4-2, 7/98 (Natural Gas Combustion).

E5-7. Nitrogen oxides (NO_X) emitted from this source shall not exceed 4.6 tons during any period of 12-consecutive months.

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

Compliance Method: Compliance with the NO_X emission limitation shall be assured by compliance with **Conditions E5-1 and E5-2**, and the NO_X emission factor of 100 lbs/10^6 scf from AP-42, Chapter 1.4, Table 1.4-1, 7/98 (Natural Gas Combustion).

E5-8. **NSPS Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units**

Under the Provisions of 40 CFR 60, Subpart Dc (Standards of Performance for New Stationary Sources –Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units), this facility is subject to and shall comply with 40 CFR 60, Subpart Dc as construction of the boiler commenced after June 9, 1989, and the boiler "has a maximum design heat input capacity of 29 megawatts (MW) [100 million British thermal units per hour (MMBtu/hr.)] or less, but greater than or equal to 2.9 MW (10 MMBtu/hr.)."

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

Compliance Method:
The permittee shall record the actual quantity of natural gas combusted or delivered to the property during each calendar month by this source in the log below, or an alternative format which provides the same information. The log must be maintained at the source location and kept available for inspection by the Technical Secretary or representative and shall be retained in accordance with **Condition E2(c)**. The log must indicate whether the record is for natural gas combusted by the source or natural gas delivered to the property.

Monthly Natural Gas Combusted or Delivered Log
Year_____

Month	Natural Gas Combusted or Delivered (ft^3)	Month	Natural Gas Combusted or Delivered (ft^3)
January		July	
February		August	
March		September	
April		October	
May		November	
June		December	

END OF PERMIT NUMBER: 580745

ATTACHMENT 1

OPACITY MATRIX DECISION TREE FOR VISIBLE EMISSION EVALUATION METHOD 9 DATED SEPTEMBER 11, 2013

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

Notes:

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

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

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

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

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

Typical Pollutants
Particulates, VOC, CO, 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.

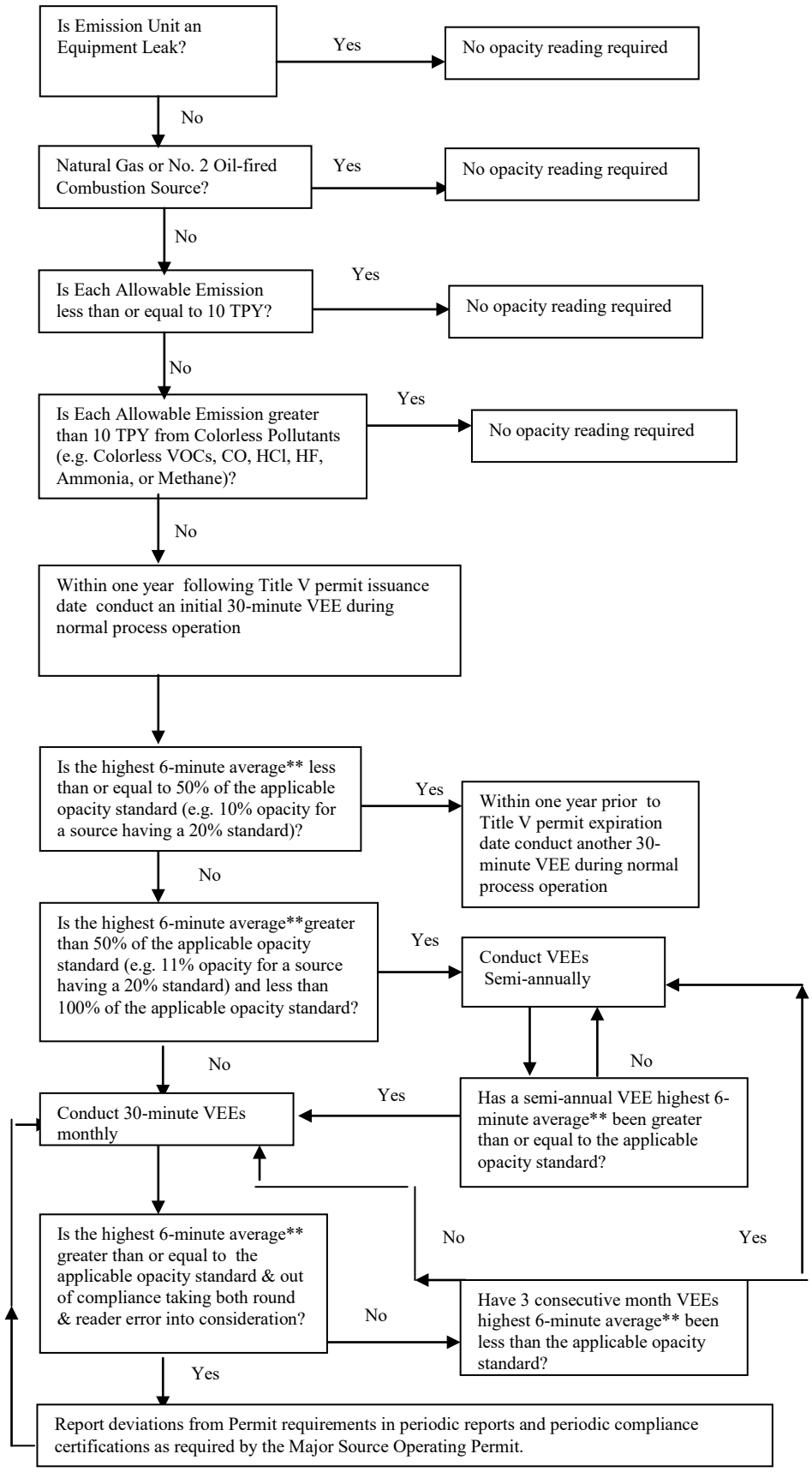
Reader Error
EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards:
The TAPCD guidance is to declares non-compliance when the highest six-minute average** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

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
TITLE V FEE SELECTION FORM APC 36 (CN-1583)

DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
Davy Crockett Tower, 7th Floor
500 James Robertson Parkway, Nashville, TN 37243
Telephone: (615) 532-0554, Email: Air.Pollution.Control@TN.gov

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.

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

ATTACHMENT 3
AGREEMENT LETTER DATED MAY 28, 2025

May 28th, 2025

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

RE: Permit Agreement Letter
Foam Fabricators, Inc
24 College Park Cove, Jackson, TN
Emission Source Reference No. 57-0221-00 / Permit No. 580745

To the Technical Secretary:

On behalf of Foam Fabricators, Inc, the following emission limitations are agreed upon regarding the above-mentioned facility in order to avoid PSD (Prevention of Significant Air Quality Deterioration) pursuant to TAPCR 1200-03-09-.01(4) and to reduce annual fees:

Source 01 – Expansion/Molding of Polystyrene Beads

- Volatile organic compounds (VOC) emitted from this source shall not exceed 240.0 tons during any period of 12-consecutive months. Compliance with this emission limitation shall be demonstrated by calculating the VOC emissions from the source during each calendar month and during each period of 12-consecutive months.

Source 05 – 10.5 MMBtu/hr Natural Gas-fired Boiler

- Particulate matter (PM) emitted from this source shall not exceed 0.08 pounds per hour (lbs./hr.) on a daily average basis.
- Sulfur dioxide (SO_2) emitted from this source shall not exceed 0.01 pounds per hour (lbs./hr.) on a daily average basis.
- Compliance with these emission limitations is assured a maximum heat input rate of 10.5 MMBtu/hr of the boiler, use of natural gas as the only fuel for the boiler, and the following emission factors:
  - 7.6 lbs PM/10^6 scf natural gas from AP-42 Chapter 1.4 Table 1.4-2
  - 0.6 lbs SO_2/10^6 scf natural gas from AP-42 Chapter 1.4 Table 1.4-2

Should you have any questions or require additional information, please contact Donnie Burns via phone at 330/993-7988 or via e-mail at doburns@altorsolutions.com.

On behalf of Foam Fabricators, Inc, I agree to the above limitations. I am authorized to represent and bind the facility in environmental affairs.

Signature of Responsible Official _____

Name (Printed) Donnie Burns

Title Corp. EHS Director

Date 5/28/2025

AG AEGIS COMPANY, INC.
13675 Route 6
Corry, PA 16407

August 25th, 2022

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

RE: Title V Permit Renewal Application
Foam Fabricators, Inc.
24 College Park Cove
Jackson, Madison County, TN 38301
Emission Source Reference Number: 57-0221
Title V Permit Number: 572557

To Whom It May Concern:

Enclosed, please find one (1) full copy of an application to renew existing Title V Permit #572557 held by Foam Fabricators, Inc. located in Jackson, Madison County, TN. If you have any questions or require additional information, please do not hesitate to contact me at 814-664-8103 ext. 230 or by email at tcoldren@aegis-usa.com.

Sincerely,

Tim Coldren
Senior Project Manager
AG Aegis Company, Inc.

Cc: *Brandon Melton*
Foam Fabricators, Inc.

Mark Sabolcik
Foam Fabricators, Inc.

State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243
Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
INDEX OF AIR POLLUTION PERMIT APPLICATION FORMS

Section 1: Identification and Diagrams		
This application contains the following forms:	APC Form 1, Facility Identification	1
	APC Form 2, Operations and Flow Diagrams	1

Section 2: Emission Source Description Forms		
		Total number of this form
This application contains the following forms (one form for each incinerator, printing operation, fuel burning installation, etc.):	APC Form 3, Stack Identification	7
	APC Form 4, Fuel Burning Non-Process Equipment	1
	APC Form 5, Stationary Gas Turbines or Internal Combustion Engines	0
	APC Form 6, Storage Tanks	0
	APC Form 7, Incinerators	0
	APC Form 8, Printing Operations	0
	APC Form 9, Painting and Coating Operations	0
	APC Form 10, Miscellaneous Processes	1
	APC Form 33, Stage I and Stage II Vapor Recovery Equipment	0
	APC Form 34, Open Burning	0

Section 3: Air Pollution Control System Forms		
		Total number of this form
This application contains the following forms (one form for each control system in use at the facility):	APC Form 11, Control Equipment - Miscellaneous	0
	APC Form 13, Adsorbers	0
	APC Form 14, Catalytic or Thermal Oxidation Equipment	0
	APC Form 15, Cyclones/Settling Chambers	0
	APC Form 17, Wet Collection Systems	0
	APC Form 18, Baghouse/Fabric Filters	0

(OVER)

Section 4: Compliance Demonstration Forms		
		Total number of this form
This application contains the following forms (one form for each incinerator, printing operation, fuel burning installation, etc.):	APC Form 19, Compliance Certification - Monitoring and Reporting - Description of Methods for Determining Compliance	2
	APC Form 20, Continuous Emissions Monitoring	0
	APC Form 21, Portable Monitors	0
	APC Form 22, Control System Parameters or Operating Parameters of a Process	0
	APC Form 23, Monitoring Maintenance Procedures	0
	APC Form 24, Stack Testing	0
	APC Form 25, Fuel Sampling and Analysis	0
	APC Form 26, Record Keeping	2
	APC Form 27, Other Methods	0
	APC Form 28, Emissions from Process Emissions Sources / Fuel Burning Installations / Incinerators	2
	APC Form 29, Emissions Summary for the Facility or for the Source Contained in This Application	1
	APC Form 30, Current Emissions Requirements and Status	3
	APC Form 31, Compliance Plan and Compliance Certification	1
	APC Form 32, Air Monitoring Network	0

Section 5: Statement of Completeness and Certification of Compliance

I have reviewed this application in its entirety and to the best of my knowledge, and based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete. I have provided all the information that is necessary for compliance purposes and this application consists of 45 pages and they are numbered from page 1 to 45. The status of this facility's compliance with all applicable air pollution control requirements, including the enhanced monitoring and compliance certification requirements of the Federal Clean Air Act, is reported in this application along with the methods to be used for compliance demonstration.

Name and Title of Responsible Official	Telephone Number with Area Code
Mark Sabolcik Vice President	814-838-4538

Signature of Responsible Official	Date of Application
	8/15/22

(For definition of responsible official, see instructions for APC Form 1)

State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243
Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
FACILITY IDENTIFICATION

SITE INFORMATION			
1. Organization's legal name Foam Fabricators, Inc.			For APC Use Only: APC company point no.
2. Site name (if different from legal name)			For APC Use Only: APC Log/Permit no.
3. Site address (St./Rd./Hwy.) 24 College Park Cove			NAICS or SIC Code 3086
City or distance to nearest town Jackson		Zip code 38301	County name Madison
4. Site location (in Lat./Long)	Latitude 35° 38' 33.84" N		Longitude 88° 47' 11.70" W
CONTACT INFORMATION (RESPONSIBLE OFFICIAL)			
5. Responsible official contact Mark Sabolcik			Phone number with area code 814-838-4538
6. Mailing address (St./Rd./Hwy.) 6550 West Ridge Road			Fax number with area code 814-838-3683
City Erie	State PA	Zip code 16506	Email address msabolcik@foamfabricatorsinc.com
CONTACT INFORMATION (TECHNICAL)			
7. Principal technical contact Brandon Melton			Phone number with area code 731-423-3161
8. Mailing address (St./Rd./Hwy.) 24 College Park Cove			Fax number with area code 731-423-3285
City Jackson	State TN	Zip code 38301	Email address bmelton@foamfabricatorsinc.com
CONTACT INFORMATION (BILLING)			
11. Billing contact Brandon Melton			Phone number with area code 731-423-3161
12. Mailing address (St./Rd./Hwy.) 24 College Park Cove			Fax number with area code 731-423-3285
City Jackson	State TN	Zip code 38301	Email address bmelton@foamfabricatorsinc.com

TYPE OF PERMIT REQUESTED

13. Permit requested for:

Initial application to operate:		Minor permit modification:	
Permit renewal to operate:	✓	Significant modification:	
Administrative permit amendment:		Construction permit:	

(OVER)

HAZARDOUS AIR POLLUTANTS, DESIGNATIONS, AND OTHER PERMITS ASSOCIATED WITH FACILITY

14. Is this facility subject to the provisions governing prevention of accidental releases of hazardous air contaminants contained in Chapter 1200-03-32 of the Tennessee Air Pollution Control regulations?

☐ Yes ☑ No

If the answer is Yes, are you in compliance with the provisions of Chapter 1200-03-32 of the Tennessee Air Pollution Control regulations?

☐ Yes ☐ No

15. If facility is located in an area designated as "Non-Attainment" or "Additional Control", indicate the pollutant(s) for the designation.

N/A

16. List all valid Air Pollution permits issued to the sources contained in this application [identify all permits with most recent permit numbers and emission source reference numbers listed on the permit(s)].

Operating Permit (Tilte V) - 572557
Emission Source Reference Number - 57-0221

17. Page number: 1 Revision number: Date of revision:

State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243
Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
OPERATIONS AND FLOW DIAGRAMS

1. Please list, identify, and describe briefly process emission sources, fuel burning installations, and incinerators that are contained in this application. Please attach a flow diagram for this application.

Expansion and Molding of Expandable Polystyrene (EPS) Beads:

Expandable polystyrene beads are received at the facility in large boxes. The beads are pneumatically fed into a pre-expander which puffs the beads utilizing steam generated by a natural gas fired boiler. The puffed beads are stored in large vertical bags prior to the molding process. The beads are pneumatically fed from the bag storage to multiple molding machines. The molded polystyrene parts are transferred to the warehouse for storage and final shipping. The emissions from this process include pentane, which is a blowing agent in the expandable polystyrene bead.

Natural Gas Fired Boiler:

The facility operates a primary natural gas fired boiler to generate steam used in the manufacturing process.

See Attachment A for a process flow diagram.

2. List all insignificant activities which are exempted because of size or production rate and cite the applicable regulations.

Natural Gas Fired Space Heaters (10 total - (8) 200,000 btu/hr / (2) 400,000 btu/hr)
TAPCR 1200-03-09-.04-4-d-17

Secondary Natural Gas Fired Boiler (8.4 mmbtu/hr)
TAPCR 1200-03-09-.04-4-d-17

Molded Part Regrind System
TAPCR 1200-03-09-.04-4-d-8

3. Are there any storage piles?

YES _____ NO X

4. List the states that are within 50 miles of your facility.

None

5. Page number: 2 Revision Number: Date of Revision:

State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243
Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
STACK IDENTIFICATION

GENERAL IDENTIFICATION AND DESCRIPTION

1. **Facility name:**
Foam Fabricators, Inc.

2. **Emission source (identify):**
Primary Boiler - Cleaver Brooks

STACK DESCRIPTION

3. Stack ID (or flow diagram point identification):
BL05

4. Stack height above grade in feet:
23

5. Velocity (data at exit conditions):
24.6 (Actual feet per second)

6. Inside dimensions at outlet in feet:
1.7

7. Exhaust flow rate at exit conditions (ACFM):
400

8. Flow rate at standard conditions (DSCFM):
400

9. Exhaust temperature:
375 Degrees Fahrenheit (°F)

10. Moisture content (data at exit conditions):
15.9 Percent _____ Grains per dry standard cubic foot (gr./dscf.)

11. Exhaust temperature that is equaled or exceeded during ninety (90) percent or more of the operating time (for stacks subject to diffusion equation only):
N/A (°F)

12. If this stack is equipped with continuous pollutant monitoring equipment required for compliance, what pollutant(s) does this equipment monitor (e.g., Opacity, SO_2, NO_x, etc.)?
N/A

Complete the appropriate APC form(s) 4, 5, 7, 8, 9, or 10 for each source exhausting through this stack.

BYPASS STACK DESCRIPTION

13. Do you have a bypass stack?
_____ Yes X No

If yes, describe the conditions which require its use & complete APC form 4 for the bypass stack. Please identify the stack number(s) of flow diagram point number(s) exhausting through this bypass stack.

14. Page number: 3 Revision Number: Date of Revision:

State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243
Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
STACK IDENTIFICATION

GENERAL IDENTIFICATION AND DESCRIPTION

1. **Facility name:**
Foam Fabricators, Inc.

2. **Emission source (identify):**
Fugitive VOC Emissions

STACK DESCRIPTION

3. Stack ID (or flow diagram point identification):
UDC01, UDC02, UDC03 - three (3) powered up-draft ceiling fans in the production area

4. Stack height above grade in feet:
24

5. Velocity (data at exit conditions):
1,201,200 (Actual feet per second)

6. Inside dimensions at outlet in feet:
3.17

7. Exhaust flow rate at exit conditions (ACFM):
20,020

8. Flow rate at standard conditions (DSCFM):
20,020

9. Exhaust temperature:
ambient Degrees Fahrenheit (°F)

10. Moisture content (data at exit conditions):
unknown Percent
unknown Grains per dry standard cubic foot (gr./dscf.)

11. Exhaust temperature that is equaled or exceeded during ninety (90) percent or more of the operating time (for stacks subject to diffusion equation only):
N/A (°F)

12. If this stack is equipped with continuous pollutant monitoring equipment required for compliance, what pollutant(s) does this equipment monitor (e.g., Opacity, SO_2, NO_x, etc.)?
N/A

Complete the appropriate APC form(s) 4, 5, 7, 8, 9, or 10 for each source exhausting through this stack.

BYPASS STACK DESCRIPTION

13. Do you have a bypass stack?
___ Yes X No

If yes, describe the conditions which require its use & complete APC form 4 for the bypass stack. Please identify the stack number(s) of flow diagram point number(s) exhausting through this bypass stack.

14. Page number: 4 Revision Number: Date of Revision:

State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243
Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
STACK IDENTIFICATION

GENERAL IDENTIFICATION AND DESCRIPTION

1. **Facility name:**
Foam Fabricators, Inc.

2. **Emission source (identify):**
Fugitive VOC Emissions

STACK DESCRIPTION

3. Stack ID (or flow diagram point identification):
LWV01 through LWV08 - eight (8) non-powered louvered wall vents (2 in production area; 6 in warehouse area)

4. Stack height above grade in feet:
4

5. Velocity (data at exit conditions):
unknown (Actual feet per second)

6. Inside dimensions at outlet in feet:
45 feet by 6.75 feet

7. Exhaust flow rate at exit conditions (ACFM):
unknown

8. Flow rate at standard conditions (DSCFM):
unknown

9. Exhaust temperature:
ambient Degrees Fahrenheit (°F)

10. Moisture content (data at exit conditions):
unknown Percent
unknown Grains per dry standard cubic foot (gr./dscf.)

11. Exhaust temperature that is equaled or exceeded during ninety (90) percent or more of the operating time (for stacks subject to diffusion equation only):
N/A (°F)

12. If this stack is equipped with continuous pollutant monitoring equipment required for compliance, what pollutant(s) does this equipment monitor (e.g., Opacity, SO_2, NO_x, etc.)?
N/A

Complete the appropriate APC form(s) 4, 5, 7, 8, 9, or 10 for each source exhausting through this stack.

BYPASS STACK DESCRIPTION

13. Do you have a bypass stack?
___ Yes X No

If yes, describe the conditions which require its use & complete APC form 4 for the bypass stack. Please identify the stack number(s) of flow diagram point number(s) exhausting through this bypass stack.

14. Page number: 5 Revision Number: Date of Revision:

State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243
Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
STACK IDENTIFICATION

GENERAL IDENTIFICATION AND DESCRIPTION

1. **Facility name:**
Foam Fabricators, Inc.

2. **Emission source (identify):**
Fugitive VOC Emissions

STACK DESCRIPTION

3. Stack ID (or flow diagram point identification):
PE01, PE02 - two (2) non-powered ceiling vents in ceiling above the pre-expansion equipment

4. Stack height above grade in feet:
24

5. Velocity (data at exit conditions):
unknown (Actual feet per second)

6. Inside dimensions at outlet in feet:
2.67

7. Exhaust flow rate at exit conditions (ACFM):
unknown

8. Flow rate at standard conditions (DSCFM):
unknown

9. Exhaust temperature:
ambient Degrees Fahrenheit (°F)

10. Moisture content (data at exit conditions):
unknown Percent
unknown Grains per dry standard cubic foot (gr./dscf.)

11. Exhaust temperature that is equaled or exceeded during ninety (90) percent or more of the operating time (for stacks subject to diffusion equation only):
N/A (°F)

12. If this stack is equipped with continuous pollutant monitoring equipment required for compliance, what pollutant(s) does this equipment monitor (e.g., Opacity, SO_2, NO_x, etc.)?
N/A

Complete the appropriate APC form(s) 4, 5, 7, 8, 9, or 10 for each source exhausting through this stack.

BYPASS STACK DESCRIPTION

13. Do you have a bypass stack?
_____ Yes X No

If yes, describe the conditions which require its use & complete APC form 4 for the bypass stack. Please identify the stack number(s) of flow diagram point number(s) exhausting through this bypass stack.

14. Page number: 6 Revision Number: Date of Revision:

State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
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Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
STACK IDENTIFICATION

GENERAL IDENTIFICATION AND DESCRIPTION

1. **Facility name:**
Foam Fabricators, Inc.

2. **Emission source (identify):**
Fugitive VOC Emissions

STACK DESCRIPTION

3. Stack ID (or flow diagram point identification):
TRBN01 through TRBN11 - eleven (11) non-powered roof turbine vents (plant wide)

4. Stack height above grade in feet:
22 to 24

5. Velocity (data at exit conditions):
unknown (Actual feet per second)

6. Inside dimensions at outlet in feet:
1.67

7. Exhaust flow rate at exit conditions (ACFM):
unknown

8. Flow rate at standard conditions (DSCFM):
unknown

9. Exhaust temperature:
ambient Degrees Fahrenheit (°F)

10. Moisture content (data at exit conditions):
unknown Percent
unknown Grains per dry standard cubic foot (gr./dscf.)

11. Exhaust temperature that is equaled or exceeded during ninety (90) percent or more of the operating time (for stacks subject to diffusion equation only):
N/A (°F)

12. If this stack is equipped with continuous pollutant monitoring equipment required for compliance, what pollutant(s) does this equipment monitor (e.g., Opacity, SO_2, NO_x, etc.)?
N/A

Complete the appropriate APC form(s) 4, 5, 7, 8, 9, or 10 for each source exhausting through this stack.

BYPASS STACK DESCRIPTION

13. Do you have a bypass stack?
___ Yes X No

If yes, describe the conditions which require its use & complete APC form 4 for the bypass stack. Please identify the stack number(s) of flow diagram point number(s) exhausting through this bypass stack.

14. Page number: 7 Revision Number: Date of Revision:

State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243
Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
STACK IDENTIFICATION

GENERAL IDENTIFICATION AND DESCRIPTION

1. **Facility name:**
Foam Fabricators, Inc.

2. **Emission source (identify):**
Fugitive VOC Emissions

STACK DESCRIPTION

3. Stack ID (or flow diagram point identification):
PWF01, PWF02 - two (2) powered wall fans in the production area

4. Stack height above grade in feet:
17

5. Velocity (data at exit conditions):
1,320,000 (Actual feet per second)

6. Inside dimensions at outlet in feet:
4.5 feet x 4.58 feet

7. Exhaust flow rate at exit conditions (ACFM):
22,000

8. Flow rate at standard conditions (DSCFM):
22,000

9. Exhaust temperature:
ambient Degrees Fahrenheit (°F)

10. Moisture content (data at exit conditions):
unknown Percent
unknown Grains per dry standard cubic foot (gr./dscf.)

11. Exhaust temperature that is equaled or exceeded during ninety (90) percent or more of the operating time (for stacks subject to diffusion equation only):
N/A (°F)

12. If this stack is equipped with continuous pollutant monitoring equipment required for compliance, what pollutant(s) does this equipment monitor (e.g., Opacity, SO_2, NO_x, etc.)?
N/A

Complete the appropriate APC form(s) 4, 5, 7, 8, 9, or 10 for each source exhausting through this stack.

BYPASS STACK DESCRIPTION

13. Do you have a bypass stack?
___ Yes X No

If yes, describe the conditions which require its use & complete APC form 4 for the bypass stack. Please identify the stack number(s) of flow diagram point number(s) exhausting through this bypass stack.

14. Page number: 8 Revision Number: Date of Revision:

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Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
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Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
STACK IDENTIFICATION

GENERAL IDENTIFICATION AND DESCRIPTION

1. **Facility name:**
Foam Fabricators, Inc.

2. **Emission source (identify):**
Fugitive VOC Emissions

STACK DESCRIPTION

3. Stack ID (or flow diagram point identification):
WWF01, WWF02, WWF03 - three (3) powered wall fans in the warehouse area

4. Stack height above grade in feet:
17

5. Velocity (data at exit conditions):
1,320,000 (Actual feet per second)

6. Inside dimensions at outlet in feet:
4.5 feet x 4.58 feet

7. Exhaust flow rate at exit conditions (ACFM):
22,000

8. Flow rate at standard conditions (DSCFM):
22,000

9. Exhaust temperature:
ambient Degrees Fahrenheit (°F)

10. Moisture content (data at exit conditions):
unknown Percent
unknown Grains per dry standard cubic foot (gr./dscf.)

11. Exhaust temperature that is equaled or exceeded during ninety (90) percent or more of the operating time (for stacks subject to diffusion equation only):
N/A (°F)

12. If this stack is equipped with continuous pollutant monitoring equipment required for compliance, what pollutant(s) does this equipment monitor (e.g., Opacity, SO_2, NO_x, etc.)?
N/A

Complete the appropriate APC form(s) 4, 5, 7, 8, 9, or 10 for each source exhausting through this stack.

BYPASS STACK DESCRIPTION

13. Do you have a bypass stack?
___ Yes X No

If yes, describe the conditions which require its use & complete APC form 4 for the bypass stack. Please identify the stack number(s) of flow diagram point number(s) exhausting through this bypass stack.

14. Page number: 9 Revision Number: Date of Revision:

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TITLE V PERMIT APPLICATION
FUEL BURNING NON-PROCESS EQUIPMENT

GENERAL IDENTIFICATION AND DESCRIPTION

1. **Facility name:**
Foam Fabricators, Inc.

2. **Stack ID or flow diagram point identification (s):**
BL05

FUEL BURNING EQUIPMENT DESCRIPTION

3. List all fuel burning equipment that is at this fuel burning installation (please complete an APC 4 form for each piece of fuel burning equipment).
Boiler

4. Fuel burning equipment identification number:
Boiler 05

5. Fuel burning equipment description:
One (1) Cleaver Brooks 10.5 MMBtu/hr boiler fueled by natural gas.

6. Year of installation or last modification of fuel burning equipment.
1992

7. Furnace type:
automatic

8. Manufacturer model number (if available):
Cleaver Brooks - CBE 200

9. Location of this fuel burning installation in UTM coordinates: UTM Vertical: 506246.0621921905 UTM Horizontal: 9862688.997895166

10. Normal operating schedule: 24 Hrs./Day 4.4 Days/Wk. 229 Days/Yr.

FUELS, CONTROLS, AND MONITORING DESCRIPTION

11. Maximum rated heat input capacity (in million BTU/Hour)
10.5 MMBtu/hr

12. If wood is used as a fuel, specify the amount of wood used as a fraction of total heat input.
N/A

13. Fuels:	Primary fuel	Backup fuel #1	Backup fuel #2	Backup fuel #3
Fuel name	Natural Gas			
Actual yearly consumption	32,216,000 cubic feet			

14. If emissions from this fuel burning equipment are controlled for compliance, please specify the type of control:
N/A

15. If emissions from this fuel burning equipment are monitored for compliance, please specify the type of monitoring:
N/A

16. Describe any fugitive emissions associated with this process, such as outdoor storage piles, open conveyors, material handling operations, etc. (please attach a separate sheet if necessary).
N/A

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Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
MISCELLANEOUS PROCESSES

GENERAL IDENTIFICATION AND DESCRIPTION

1. **Facility name:**
Foam Fabricators, Inc.

2. **Process emission source (identify):**
EPS001, EPS002, EPS003, EPS004

3. Stack ID or flow diagram point identification (s):
EPS001-Pre-Expanders, EPS002-Bag Storage, EPS003-Molding Machines, EPS004-Warehouse

4. Year of construction or last modification:
1992

If the emissions are controlled for compliance, attach an appropriate Air Pollution Control system form.

5. Normal operating schedule: 24 Hrs./Day 7 Days/Wk. 365 Days/Yr.

6. Location of this process emission source in UTM coordinates: UTM Vertical: 506246.0622456874 UTM Horizontal: 9862688.998452148

7. Describe this process (Please attach a flow diagram of this process) and check one of the following:

[ ] Batch [✓] Continuous

PROCESS MATERIAL INPUT AND OUTPUT

8. List the types and amounts of raw materials input to this process:

Material	Storage/Material handling process	Average usage (units)	Maximum usage (units)
Expandable Polystyrene Beads	expansion, bag storage, molding, warehouse	1,792 pounds per hour	2,800 pounds per hour

9. List the types and amounts of primary products produced by this process:

Material	Storage/Material handling process	Average usage (units)	Maximum usage (units)
Molded Foam Packaging	boxed and warehoused on-site prior to shipping	2,050 tons of beads processed	3,203 tons of beads processed

10. Process fuel usage:

Type of fuel	Max heat input (10^6 BTU/Hr.)	Average usage (units)	Maximum usage (units)

11. List any solvents, cleaners, etc., associated with this process:
N/A

If the emissions and/or operations of this process are monitored for compliance, please attach the appropriate Compliance Demonstration form.

12. Describe any fugitive emissions associated with this process, such as outdoor storage piles, open conveyors, open air sand blasting, material handling operations, etc. (please attach a separate sheet if necessary).
The entire EPS process is considered fugitive. There are no specific stacks associated with any source emitting pentane (VOC) during the processing of EPS beads.

13. Page number: 11 Revision Number: Date of Revision:

State of Tennessee
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Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
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Nashville, TN 37243
Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
COMPLIANCE CERTIFICATION - MONITORING AND REPORTING
DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE

All sources that are subject to 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations are required to certify compliance with all applicable requirements by including a statement within the permit application of the methods used for determining compliance. This statement must include a description of the monitoring, recordkeeping, and reporting requirements and test methods. In addition, the application must include a schedule for compliance certification submittals during the permit term. These submittals must be no less frequent than annually and may need to be more frequent if specified by the underlying applicable requirement or the Technical Secretary.

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name: Foam Fabricators, Inc.
2. Process emission source, fuel burning installation, or incinerator (identify): Boiler 05
3. Stack ID or flow diagram point identification(s): BL05

METHODS OF DETERMINING COMPLIANCE

4. This source as described under Item #2 of this application will use the following method(s) for determining compliance with applicable requirements (and special operating conditions from an existing permit). Check all that apply and attach the appropriate form(s)

- [ ] Continuous Emission Monitoring (CEM) - APC 20
  Pollutant(s):
- [ ] Emission Monitoring Using Portable Monitors - APC 21
  Pollutant(s):
- [ ] Monitoring Control System Parameters or Operating Parameters of a Process - APC 22
  Pollutant(s):
- [ ] Monitoring Maintenance Procedures - APC 23
  Pollutant(s):
- [ ] Stack Testing - APC 24
  Pollutant(s):
- [ ] Fuel Sampling & Analysis (FSA) - APC 25
  Pollutant(s):
- [x] Recordkeeping - APC 26
  Pollutant(s): NOX, PM, SO2, CO, VOC
- [ ] Other (please describe) - APC 27
  Pollutant(s):

5. Compliance certification reports will be submitted to the Division according to the following schedule:
   Start date: 2007
   And every 365 days thereafter.
6. Compliance monitoring reports will be submitted to the Division according to the following schedule:
   Start date: 2007
   And every 180 days thereafter.
7. Page number: 12 Revision number: Date of revision:

State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243
Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
COMPLIANCE CERTIFICATION - MONITORING AND REPORTING
DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE

All sources that are subject to 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations are required to certify compliance with all applicable requirements by including a statement within the permit application of the methods used for determining compliance. This statement must include a description of the monitoring, recordkeeping, and reporting requirements and test methods. In addition, the application must include a schedule for compliance certification submittals during the permit term. These submittals must be no less frequent than annually and may need to be more frequent if specified by the underlying applicable requirement or the Technical Secretary.

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name: Foam Fabricators, Inc.
2. Process emission source, fuel burning installation, or incinerator (identify): EPS001, EPS002, EPS003, EPS004 (EPS Process)
3. Stack ID or flow diagram point identification(s): EPS001, EPS002, EPS003, EPS004

METHODS OF DETERMINING COMPLIANCE

4. This source as described under Item #2 of this application will use the following method(s) for determining compliance with applicable requirements (and special operating conditions from an existing permit). Check all that apply and attach the appropriate form(s)

- [ ] Continuous Emission Monitoring (CEM) - APC 20
  Pollutant(s):
- [ ] Emission Monitoring Using Portable Monitors - APC 21
  Pollutant(s):
- [ ] Monitoring Control System Parameters or Operating Parameters of a Process - APC 22
  Pollutant(s):
- [ ] Monitoring Maintenance Procedures - APC 23
  Pollutant(s):
- [ ] Stack Testing - APC 24
  Pollutant(s):
- [ ] Fuel Sampling & Analysis (FSA) - APC 25
  Pollutant(s):
- [x] Recordkeeping - APC 26
  Pollutant(s): VOC
- [ ] Other (please describe) - APC 27
  Pollutant(s):

5. Compliance certification reports will be submitted to the Division according to the following schedule:
   Start date: 2007
   And every 365 days thereafter.
6. Compliance monitoring reports will be submitted to the Division according to the following schedule:
   Start date: 2007
   And every 180 days thereafter.
7. Page number: 13 Revision number: Date of revision:

State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243
Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
COMPLIANCE DEMONSTRATION BY RECORDKEEPING

Recordkeeping shall be acceptable as a compliance demonstration method provided that a correlation between the parameter value recorded and the applicable requirement is established.

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name:
Foam Fabricators, Inc.

2. Stack ID or flow diagram point identification(s):
BL05

3. Emission source (identify):
Boiler 05 - Cleaver Brooks

MONITORING AND RECORDKEEPING DESCRIPTION

4. Pollutant(s) or parameter being monitored:
NOX, PM, SO2, CO, VOC

5. Material or parameter being monitored and recorded:
Quantity of natural gas consumed monthly.

6. Method of monitoring and recording:
A. Record and retain monthly natural gas invoice from natural gas provider. Invoice identifies cubic feet used for the monthly billing period. Cubic feet of natural gas used for the month is transferred to the rolling average emissions tracking spreadsheet (VOC).

7. Compliance demonstration frequency (specify the frequency with which compliance will be demonstrated):
A. Natural gas usage is recorded monthly.

8. Page number: 14 Revision number: Date of revision:

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Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
COMPLIANCE DEMONSTRATION BY RECORDKEEPING

Recordkeeping shall be acceptable as a compliance demonstration method provided that a correlation between the parameter value recorded and the applicable requirement is established.

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name:
Foam Fabricators, Inc.

2. Stack ID or flow diagram point identification(s):
EPS001, EPS002, EPS003, EPS004

3. Emission source (identify):
EPS001 - Pre-Expanders, EPS002 - Bag Storage, EPS003 - Molding Machines, EPS004 - Warehouse Storage

MONITORING AND RECORDKEEPING DESCRIPTION

4. Pollutant(s) or parameter being monitored:
VOC

5. Material or parameter being monitored and recorded:
Expandable Polystyrene Beads

6. Method of monitoring and recording:

A. The facility keeps a record of the amount of each raw material used (polystyrene beads), VOC content of each raw material and the amount of VOC emitted in a computer-based spreadsheet.

B. The facility calculates the actual amount of VOC emitted from the EPS process by using records of amounts of raw material input (expandable polystyrene beads) and the pentane content of the raw materials.

C. The facility updates the rolling average spreadsheet within 30 days after the end of each calendar month.

D. These records are retained for a period of not less than 5 years.

E. The expansion/molding of polystyrene beads is based on the facility's current Title V Permit (Permit #572557, Emission Source Reference #57-0221).

7. Compliance demonstration frequency (specify the frequency with which compliance will be demonstrated):

A. The facility keeps a record of the amount of each raw material used (polystyrene beads), VOC content of each raw material, and amount of VOC emitted in a computer-based spreadsheet. The spreadsheet is maintained daily. The facility updates the rolling average spreadsheet within 30 days after the end of each calendar month.

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Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
EMISSIONS FROM PROCESS EMISSION SOURCE / FUEL BURNING INSTALLATION / INCINERATOR

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name:	2. Stack ID or flow diagram point identification(s):
Foam Fabricators, Inc.	BL05

3. Process emission source / Fuel burning installation / Incinerator (identify):
Boiler 05 - Cleaver Brooks

EMISSIONS SUMMARY TABLE – CRITERIA AND FUGITIVE EMISSIONS

4. Complete the following emissions summary for regulated air pollutants. Fugitive emissions shall be included. Attach calculations and emission factor references.

Air Pollutant	Maximum Allowable Emissions		Actual Emissions	
	Tons per Year	Reserved for State use (Pounds per Hour - Item 7, APC 30)	Tons per Year	Reserved for State use (Pounds per Hour- Item 8, APC 30)
Particulate Matter (TSP)	0.4		0.12	
(Fugitive Emissions)				
Sulfur Dioxide	0.1		0.01	
(Fugitive Emissions)				
Volatile Organic Compounds	0.3		0.09	
(Fugitive Emissions)				
Carbon Monoxide	3.9		1.35	
(Fugitive Emissions)				
Lead				
(Fugitive Emissions)				
Nitrogen Oxides	4.6		1.61	
(Fugitive Emissions)				
Total Reduced Sulfur				
(Fugitive Emissions)				
Mercury				
(Fugitive Emissions)				

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AIR POLLUTANT	Maximum Allowable Emissions		Actual Emissions	
	Tons per Year	Reserved for State use (Pounds per Hour - Item 7, APC 30)	Tons per Year	Reserved for State use (Pounds per Hour- Item 8, APC 30)
Asbestos				
(Fugitive Emissions)				
Beryllium				
(Fugitive Emissions)				
Vinyl Chloride				
(Fugitive Emissions)				
Fluorides				
(Fugitive Emissions)				
Gaseous Fluorides				
(Fugitive Emissions)				
Greenhouse Gases in CO_2 Equivalents	100,000.00		1,944.97	

EMISSIONS SUMMARY TABLE – FUGITIVE HAZARDOUS AIR POLLUTANTS

5. Complete the following emissions summary for regulated air pollutants that are hazardous air pollutant(s). Fugitive emissions shall be included. Attach calculations and emission factor references.

Air Pollutant & CAS	Maximum Allowable Emissions		Actual Emissions	
	Tons per Year	Reserved for State use (Pounds per Hour - Item 7, APC 30)	Tons per Year	Reserved for State use (Pounds per Hour- Item 8, APC 30)

6. Page number: 17 Revision number: Date of revision

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Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
EMISSIONS FROM PROCESS EMISSION SOURCE / FUEL BURNING INSTALLATION / INCINERATOR

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name: Foam Fabricators, Inc.

2. Stack ID or flow diagram point identification(s): EPS001, EPS002, EPS003, EPS004

3. Process emission source / Fuel burning installation / Incinerator (identify): EPS001 - Pre-Expanders, EPS002 - Bag Storage, EPS003 - Molding Machines, EPS004 - Warehouse Storage

EMISSIONS SUMMARY TABLE – CRITERIA AND FUGITIVE EMISSIONS

4. Complete the following emissions summary for regulated air pollutants. Fugitive emissions shall be included. Attach calculations and emission factor references.

Air Pollutant	Maximum Allowable Emissions		Actual Emissions	
	Tons per Year	Reserved for State use (Pounds per Hour - Item 7, APC 30)	Tons per Year	Reserved for State use (Pounds per Hour- Item 8, APC 30)
Particulate Matter (TSP)				
(Fugitive Emissions)				
Sulfur Dioxide				
(Fugitive Emissions)				
Volatile Organic Compounds				
(Fugitive Emissions)	240.00		85.44	
Carbon Monoxide				
(Fugitive Emissions)				
Lead				
(Fugitive Emissions)				
Nitrogen Oxides				
(Fugitive Emissions)				
Total Reduced Sulfur				
(Fugitive Emissions)				
Mercury				
(Fugitive Emissions)				

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(Continued from last page)

AIR POLLUTANT	Maximum Allowable Emissions		Actual Emissions	
	Tons per Year	Reserved for State use (Pounds per Hour - Item 7, APC 30)	Tons per Year	Reserved for State use (Pounds per Hour- Item 8, APC 30)
Asbestos				
(Fugitive Emissions)				
Beryllium				
(Fugitive Emissions)				
Vinyl Chloride				
(Fugitive Emissions)				
Fluorides				
(Fugitive Emissions)				
Gaseous Fluorides				
(Fugitive Emissions)				
Greenhouse Gases in CO_2 Equivalents				

EMISSIONS SUMMARY TABLE – FUGITIVE HAZARDOUS AIR POLLUTANTS

5. Complete the following emissions summary for regulated air pollutants that are hazardous air pollutant(s). Fugitive emissions shall be included. Attach calculations and emission factor references.

Air Pollutant & CAS	Maximum Allowable Emissions		Actual Emissions	
	Tons per Year	Reserved for State use (Pounds per Hour - Item 7, APC 30)	Tons per Year	Reserved for State use (Pounds per Hour- Item 8, APC 30)

6. Page number: 19 Revision number: Date of revision

State of Tennessee
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William R. Snodgrass Tennessee Tower
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Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
EMISSION SUMMARY FOR THE FACILITY OR FOR THE SOURCES CONTAINED IN THIS APPLICATION

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name: Foam Fabricators, Inc.

EMISSIONS SUMMARY TABLE – CRITERIA AND SELECTED POLLUTANTS

2. Complete the following emissions summary for regulated air pollutants at this facility or for the sources contained in this application.

Air Pollutant	Summary of Maximum Allowable Emissions		Summary of Actual Emissions	
	Tons per Year	Reserved for State use (Pounds per Hour- Item 4, APC 28)	Tons per Year	Reserved for State use (Pounds per Hour- Item 4, APC 28)
Particulate Matter (TSP)	0.4		0.16	
Sulfur Dioxide	0.1		0.01	
Volatile Organic Compounds	240.00		85.55	
Carbon Monoxide	3.9		1.35	
Lead				
Nitrogen Oxides	4.6		1.61	
Total Reduced Sulfur				
Mercury				
Asbestos				
Beryllium				
Vinyl Chlorides				
Fluorides				
Gaseous Fluorides				
Greenhouse Gases in CO_2 Equivalents	100,000.00		1,944.97	

(Continued on next page)

(Continued from previous page)

EMISSIONS SUMMARY TABLE – HAZARDOUS AIR POLLUTANTS

3. Complete the following emissions summary for regulated air pollutants that are hazardous air pollutant(s) at this facility or for the sources contained in this application.

Air Pollutant & CAS	Summary of Maximum Allowable Emissions		Summary of Actual Emissions	
	Tons per Year	Reserved for State use (Pounds per Hour- Item 5, APC 28)	Tons per Year	Reserved for State use (Pounds per Hour- Item 5, APC 28)

4. Page number: 21 Revision number: Date of revision:

State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243
Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
CURRENT EMISSIONS REQUIREMENTS AND STATUS

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name:	2. Emission source number
Foam Fabricators, Inc.	Boiler 05

3. Describe the process emission source / fuel burning installation / incinerator.

Boiler (Cleaver Brooks)

EMISSIONS AND REQUIREMENTS

4. Identify if only a part of the source is subject to this requirement	5. Pollutant	6. Applicable requirement(s): TN Air Pollution Control Regulations, 40 CFR, permit restrictions, air quality based standards	7. Limitation	8. Maximum actual emissions	9. Compliance status (In/Out)
Boiler	NOx	TAPCR 1200-03-06-.03(2)	1.05 lbs/hr - 4.6 tons/yr	0.59 lbs/hr - 1.61 tons/yr	In
Boiler	PM	TAPCR 1200-03-06-.01(7)	0.08 lbs/hr - 0.4 tons/yr	0.05 lbs/hr - 0.12 tons/yr	In
Boiler	SO2	TAPCR 1200-03-14-.01(3)	0.01 lbs/hr - 0.1 tons/yr	0.004 lbs/hr - 0.01 tons/yr	In
Boiler	CO	TAPCR 1200-03-06-.03(2)	0.88 lbs/hr - 3.9 tons/yr	0.49 lbs/hr - 1.35 tons/yr	In
Boiler	VOC	TAPCR 1200-03-06-.03(2)	0.06 lbs/hr - 0.3 tons/yr	0.03 lbs/hr - 0.09 tons/yr	In
Boiler	PM	Agreement Letter 12/14/2017	0.08 lbs/hr - 0.35 tons/yr	0.05 lbs/hr - 0.12 tons/yr	In
Boiler	SO2	Agreement Letter 12/14/2017	0.01 lbs/hr - 0.03 tons/yr	0.004 lbs/hr - 0.01 tons/yr	In

10. Other applicable requirements (new requirements that apply to this source during the term of this permit)

11. Page number: 22 Revision number: Date of revision:

State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243
Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
CURRENT EMISSIONS REQUIREMENTS AND STATUS

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name:	2. Emission source number
Foam Fabricators, Inc.	EPS001, EPS002, EPS003, EPS004

3. Describe the process emission source / fuel burning installation / incinerator.

EPS001 - Pre-Expanders, EPS002 - Bag Storage, EPS003 - Molding Machines, EPS004 - Warehouse Storage

EMISSIONS AND REQUIREMENTS

4. Identify if only a part of the source is subject to this requirement	5. Pollutant	6. Applicable requirement(s): TN Air Pollution Control Regulations, 40 CFR, permit restrictions, air quality based standards	7. Limitation	8. Maximum actual emissions	9. Compliance status (In/Out)
EPS Process	VOC	TAPCR 1200-03-07-.07(2)	240.00 tons per year	85.44 tons per year	In

10. Other applicable requirements (new requirements that apply to this source during the term of this permit)

11. Page number: 23 Revision number: Date of revision:

State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243
Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
CURRENT EMISSIONS REQUIREMENTS AND STATUS

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name:	2. Emission source number
Foam Fabricators, Inc.	Facility Wide

3. Describe the process emission source / fuel burning installation / incinerator.
Facility Wide

EMISSIONS AND REQUIREMENTS

4. Identify if only a part of the source is subject to this requirement	5. Pollutant	6. Applicable requirement(s): TN Air Pollution Control Regulations, 40 CFR, permit restrictions, air quality based standards	7. Limitation	8. Maximum actual emissions	9. Compliance status (In/Out)
Facility Wide	Opacity	40 CFR 60, Appendix A	20 percent opacity	N/A	In
Facility Wide	Opacity	TAPCR 1200-03-05-.03(6)	20 percent opacity	N/A	In
Facility Wide	Opacity	TAPCR 1200-03-05-.01(1)	20 percent opacity	N/A	In

10. Other applicable requirements (new requirements that apply to this source during the term of this permit)

11. Page number: 24 Revision number: Date of revision:

State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243
Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
COMPLIANCE PLAN AND COMPLIANCE CERTIFICATION

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name:
Foam Fabricators, Inc.

2. List all the process emission source(s) or fuel burning installation(s) or incinerator(s) that are part of this application.
Boiler 05 - Cleaver Brooks

EPS Process:
EPS001 - Pre-Expanders, EPS002 - Bag Storage, EPS003 - Molding Machines, EPS004 - Warehouse Storage

COMPLIANCE PLAN AND CERTIFICATION

3. Indicate that source(s) which are contained in this application are presently in compliance with all applicable requirements, by checking the following:

X A. Attached is a statement of identification of the source(s) currently in compliance. We will continue to operate and maintain the source(s) to assure compliance with all the applicable requirements for the duration of the permit.

_____ B APC 30 form(s) includes new requirements that apply or will apply to the source(s) during the term of the permit. We will meet such requirements on a timely basis.

4. Indicate that there are source(s) that are contained in this application which are not presently in full compliance, by checking both of the following:

_____ A. Attached is a statement of identification of the source(s) not in compliance, non-complying requirement(s), brief description of the problem, and the proposed solution.

_____ B. We will achieve compliance according to the following schedule:

Action	Deadline

Progress reports will be submitted:

Start date: _____ and every 180 days thereafter until compliance is achieved.

5. State the compliance status with any applicable compliance assurance monitoring and compliance certification requirements that have been promulgated under section 114(a)(3) of the Clean Air Act as of the date of submittal of this APC 31.

N/A

6. Page number: 25 Revision number: Date of revision:

State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243
Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
APPLICATION COMPLETENESS CHECK LIST

Note to Applicants: The Application Completeness Check List is required by Division Rule 1200-03-09-.02(11)(d)1(ii)(I) and is used by Division staff to determine whether or not an application is complete. This checklist will be used to resolve any dispute between the applicant and the Division regarding the completeness of an application.

Section 1: Identification and Diagrams (APC 1 and APC 2)		
Requirement	**Complete**	**Incomplete**
Site Information	☐	☐
Contact Information (Responsible Official)	☐	☐
Contact Information (Technical)	☐	☐
Contact Information (Billing)	☐	☐
Type of Permit Requested	☐	☐
Accidental Release Information	☐	☐
Nonattainment/Additional Control Area Designation	☐	☐
List of Valid Permits	☐	☐
List and description of process emission sources, fuel burning installations, and incinerators	☐	☐
Flow diagram attached?	☐	☐
List of Insignificant Activities	☐	☐
List of Storage Piles	☐	☐
List of States within 50 Miles	☐	☐

Section 2: Emission Source Description Forms		
Forms are complete as received:		☐
Forms are incomplete (one or more application forms not submitted)		☐
Forms are incomplete (missing information on the following application forms):	APC Form 3, Stack Identification	☐
	APC Form 4, Fuel Burning Non-Process Equipment	☐
	APC Form 5, Stationary Gas Turbines or Internal Combustion Engines	☐
	APC Form 6, Storage Tanks	☐
	APC Form 7, Incinerators	☐
	APC Form 8, Printing Operations	☐
	APC Form 9, Painting and Coating Operations	☐
	APC Form 10, Miscellaneous Processes	☐
	APC Form 33, Stage I and Stage II Vapor Recovery Equipment	☐
	APC Form 34, Open Burning	☐

Section 3: Air Pollution Control System Forms		
Forms are complete as received:		☐
Forms are incomplete (one or more application forms not submitted)		☐
Forms are incomplete (missing information on the following application forms):	APC Form 11, Control Equipment - Miscellaneous	☐
	APC Form 13, Adsorbers	☐
	APC Form 14, Catalytic or Thermal Oxidation Equipment	☐
	APC Form 15, Cyclones/Settling Chambers	☐
	APC Form 17, Wet Collection Systems	☐
	APC Form 18, Baghouse/Fabric Filters	☐
Section 4: Compliance Demonstration Forms		
Forms are complete as received:		☐
Forms are incomplete (one or more application forms not submitted)		☐
Forms are incomplete (missing information on the following application forms):	APC Form 19, Compliance Certification - Monitoring and Reporting - Description of Methods for Determining Compliance	☐
	APC Form 20, Continuous Emissions Monitoring	☐
	APC Form 21, Portable Monitors	☐
	APC Form 22, Control System Parameters or Operating Parameters of a Process	☐
	APC Form 23, Monitoring Maintenance Procedures	☐
	APC Form 24, Stack Testing	☐
	APC Form 25, Fuel Sampling and Analysis	☐
	APC Form 26, Recordkeeping	☐
	APC Form 27, Other Methods	☐
	APC Form 28, Emissions from Process Emissions Sources / Fuel Burning Installations / Incinerators	☐
	APC Form 29, Emissions Summary for the Facility or for the Source Contained in This Application	☐
	APC Form 30, Current Emissions Requirements and Status	☐
	APC Form 32, Air Monitoring Network	☐

Section 5: Statement of Completeness and Certification of Compliance			
Requirement	**Complete**	**Incomplete**	**Not Applicable**
Certification of Truth, Accuracy, and Completeness (Form APC 1, Section 5)	☐	☐	☐
General Identification and Description (Form APC 31, Items 1 and 2)	☐	☐	☐
Compliance Certification for Sources Currently in Compliance (Form APC 31, Item 3A)	☐	☐	☐
Compliance Certification for New Applicable Requirements (Form APC 31, Item 3B)	☐	☐	☐
Identification of Sources Currently Not in Compliance (Form APC 31, Item 4A)	☐	☐	☐
Compliance Schedule for Sources Currently Not in Compliance (Form APC 31, Item 4B)	☐	☐	☐
Compliance Certification for Enhanced Monitoring (Form APC 31, Item 5)	☐	☐	☐

Section 6: Miscellaneous Information		
Item	**Included**	**Not Included**
For Title V modifications, is a description of the modification included?	☐	☐
Request for Permit Shield	☐	☐
Calculations on which emissions-related information are based	☐	☐
Identification of alternative operating scenarios, as applicable	☐	☐
Explanation of any proposed exemptions from otherwise applicable requirements	☐	☐
Other information needed for completeness (explain in comments)	☐	☐

Section 7: Comments
Describe any missing information below or in a separate attachment:

Section 8: Application Completeness	
Application is Complete	☐
Application is Incomplete	☐

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

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)]
Foam Fabricators, Inc. 000332478

2. Site name (if different from legal name)
same

3. Site address (St./Rd./Hwy.)	County name
24 College Park Cove	Madison
City	Zip code
Jackson	38301

4. Emission source reference number	**5.** Title V permit number
57-0221	572557

FEE SELECTION

This fee selection is effective beginning January 1, 2022. 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.
Boiler 05	PM	Actual	See Attachment C
Boiler 05	SO2	Actual	See Attachment C
Boiler 05	VOC	Actual	See Attachment C
Boiler 05	NOx	Actual	See Attachment C

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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.
EPS Process 01	VOC	Actual	See Attachment C

CONTACT INFORMATION (BILLING)

9. Billing contact Brandon Melton			Phone number with area code 731-423-3161
Mailing address (St./Rd./Hwy.) 24 College Park Cove			Fax number with area code 731-423-3285
City Jackson	State TN	Zip code 38301	**Email address** bmelton@foamfabricatorsinc.com

SIGNATURE BY RESPONSIBLE OFFICIAL

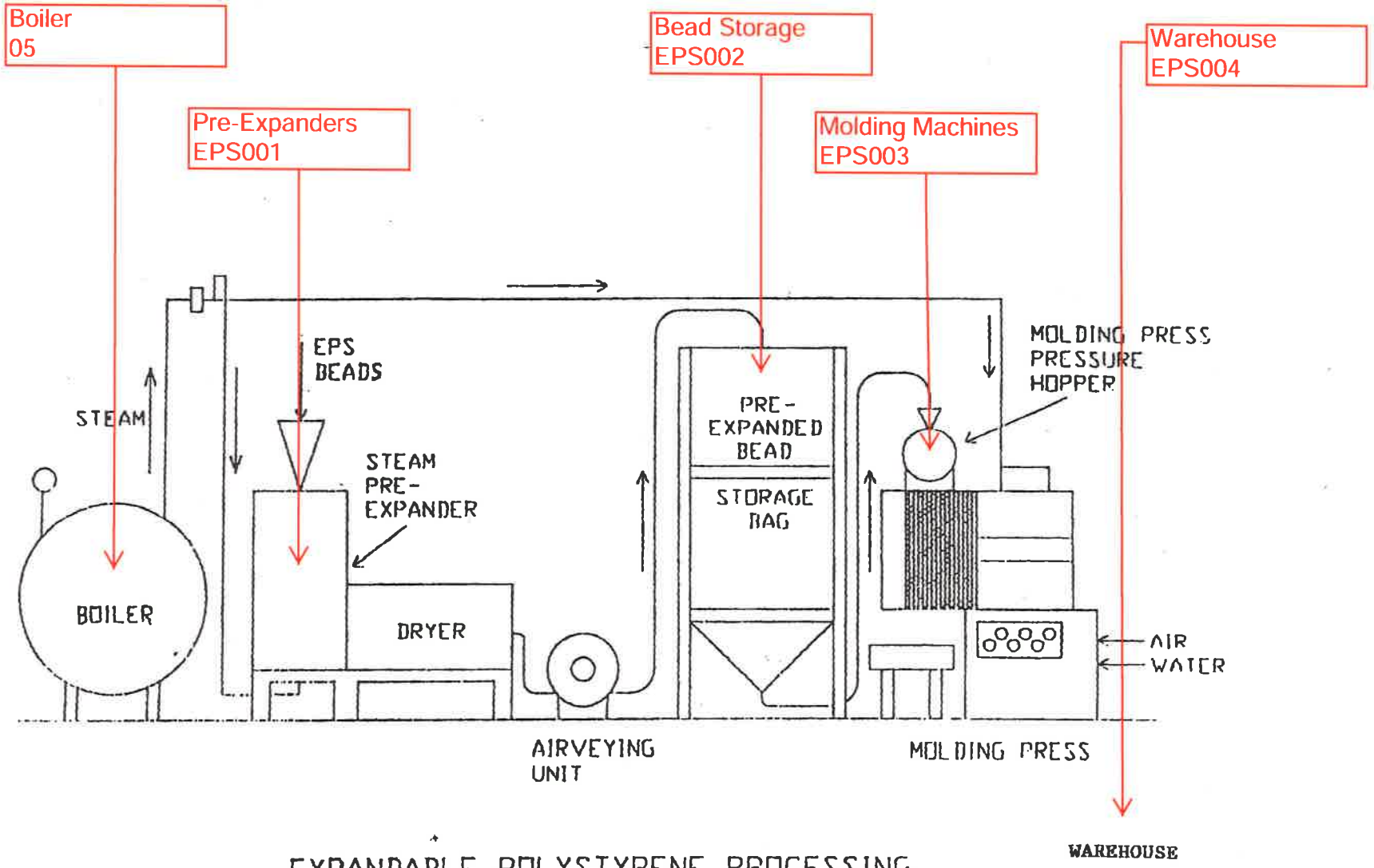
Based upon information and belief formed after reasonable inquiry, I, as the responsible person of the above mentioned facility, certify that the information contained in the submittal is accurate and true to the best of my knowledge. As specified in TCA Section 39-16-702(a)(4), this declaration is made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

10. Signature		Date 8/15/22
Signer's name (type or print) Mark Sabolcik	**Title** Vice President	Phone number with area code 814-838-3683

ATTACHMENT A
Form APC 2

PROCESS FLOW DIAGRAM

TEL 814-664-8103 | FAX 814-664-9689 | www.aegis-usa.com



EXPANDABLE POLYSTYRENE PROCESSING

ATTACHMENT B
Form APC 31

STATEMENT OF COMPLIANCE AND CERTIFICATION

TEL 814-664-8103 | FAX 814-664-9689 | www.aegis-usa.com

Statement of Compliance and Certification
Form APC 31

Sources contained in this application:

Boiler 05 - Cleaver Brooks Natural Gas Fired Boiler
EPS001 - Pre-Expanders (EPS Process)
EPS002 - Bag Storage (EPS Process)
EPS003 - Molding Machines (EPS Process)
EPS004 - Warehouse Storage (EPS Process)

Sources currently in compliance and continue to operate and maintain compliance with all applicable requirements for the duration of the permit:

In Compliance - Boiler 05 - Cleaver Brooks Natural Gas Fired Boiler
In Compliance - EPS001 - Pre-Expanders (EPS Process)
In Compliance - EPS002 - Bag Storage (EPS Process)
In Compliance - EPS003 - Molding Machines (EPS Process)
In Compliance - EPS004 - Warehouse Storage (EPS Process)

ATTACHMENT C
Form APC 36

ACTUAL EMISSIONS CALCULATION METHODS AND EXAMPLES

TEL 814-664-8103 | FAX 814-664-9689 | www.aegis-usa.com

Calculation Methods and Examples
Form APC 36

Permit Condition Numbers:

Boiler 05 - Cleaver Brooks Natural Gas Fired Boiler

57-0221 Section E1

EPS001 - Pre-Expanders (EPS Process)
EPS002 - Bag Storage (EPS Process)
EPS003 - Molding Machines (EPS Process)
EPS004 - Warehouse Storage (EPS Process)

57-0221 Section E1

Calculation Method and Example:

Boiler 05 - Cleaver Brooks Natural Gas Fired Boiler

Monthly natural gas usage is recorded from the gas meter and applied to the Twelve-Month Rolling Sum spreadsheet in accordance with Permit Condition 57-0221-05 (E5-8) (see Attachment E for example). Actual boiler emissions are fully calculated on a semi-annual basis utilizing an emissions calculation spreadsheet (see Attachment D for example). Actual annual fees for pollutants associated with natural gas combustion are calculated using the same spreadsheet with full yearly natural gas consumption numbers calculated from the Twelve-Month Rolling Sum spreadsheet.

Calculation Method and Example:

EPS001 - Pre-Expanders (EPS Process)
EPS002 - Bag Storage (EPS Process)
EPS003 - Molding Machines (EPS Process)
EPS004 - Warehouse Storage (EPS Process)

Bead usage and pentane (VOC) content are recorded daily utilizing a tracking spreadsheet (see Attachment C1 following this page). At the end of the month, information from the detailed tracking spreadsheet is transferred to the Twelve-Month Rolling Sum spreadsheet in accordance with Permit Condition 57-0221-05 (E4-2) (see Attachment E for example). Actual annual fees for VOC's associated with the EPS Process are calculated using the same Twelve-Month Rolling Sum spreadsheet.

ATTACHMENT C1
Form APC 36

Monthly Detailed EPS Usage Tracking Spreadsheet

Raw Material Inventory

Blue=Expanded
Red=Received
Black=Balance
Green=Sent Back

Month December 1, 2021

	Quantity	2,204.0	2,203.0	2,203.0	2,205.0	2,203.0	2,205.0	2,203.0	2,200.0		2,204.00
Date	**Daily**	**EVC334H**	**A5455**	**A6455**	**35MC**	**6455**	**R185B**	**5455**	**SFC-S**	**R-Mer**	**EVC334L**
BEGIN	383,353.2	0.0	85,917.5	39,654.0	4,410.9	0.0	68,347.8	163,022.5	22,000.5	0.0	0.0
USE	14,320.1			4,406.5			2,204.6	7,709.0			
Received	0.0										
1	369,033.1	0.0	85,917.5	35,247.5	4,410.9	0.0	66,143.2	155,313.5	22,000.5	0.0	0.0
USE	14,321.1			1,101.5			2,204.6	11,015.0			
Received	44,060.0							44,060.0			
2	398,772.0	0.0	85,917.5	34,146.0	4,410.9	0.0	63,938.6	188,358.5	22,000.5	0.0	0.0
USE	9,915.9						3,306.9	6,609.0			
Received	0.0										
3	388,856.1	0.0	85,917.5	34,146.0	4,410.9	0.0	60,631.7	181,749.5	22,000.5	0.0	0.0
USE	0.0										
Received	0.0										
4	388,856.1	0.0	85,917.5	34,146.0	4,410.9	0.0	60,631.7	181,749.5	22,000.5	0.0	0.0
USE	0.0										
Received	0.0										
5	388,856.1	0.0	85,917.5	34,146.0	4,410.9	0.0	60,631.7	181,749.5	22,000.5	0.0	0.0
USE	20,933.3			1,101.5	1,102.3		5,511.5	13,218.0			
Received	0.0										
6	367,922.8	0.0	85,917.5	33,044.5	3,308.6	0.0	55,120.2	168,531.5	22,000.5	0.0	0.0
USE	22,034.0			3,304.5			5,511.5	13,218.0			
Received	0.0										
7	345,888.8	0.0	85,917.5	29,740.0	3,308.6	0.0	49,608.7	155,313.5	22,000.5	0.0	0.0
USE	20,927.8			7,710.5			1,102.3	11,015.0	1,100.0		
Received	83,743.0			44,060.0			39,683.0				
8	408,704.0	0.0	85,917.5	66,089.5	3,308.6	0.0	88,189.4	144,298.5	20,900.5	0.0	0.0
USE	15,419.5			3,304.5				11,015.0	1,100.0		
Received	44,060.0							44,060.0			
9	437,344.5	0.0	85,917.5	62,785.0	3,308.6	0.0	88,189.4	177,343.5	19,800.5	0.0	0.0
USE	1,101.5							1,101.5			
Received	0.0										
10	436,243.0	0.0	85,917.5	62,785.0	3,308.6	0.0	88,189.4	176,242.0	19,800.5	0.0	0.0
USE	0.0										
Received	0.0										
11	436,243.0	0.0	85,917.5	62,785.0	3,308.6	0.0	88,189.4	176,242.0	19,800.5	0.0	0.0
USE	0.0										
Received	0.0										
12	436,243.0	0.0	85,917.5	62,785.0	3,308.6	0.0	88,189.4	176,242.0	19,800.5	0.0	0.0
USE	11,615.0			2,203.0	600.0		3,304.5	5,507.5			
Received	0.0										
13	424,628.0	0.0	85,917.5	60,582.0	2,708.6	0.0	84,884.9	170,734.5	19,800.5	0.0	0.0
USE	14,318.0			4,406.0				8,812.0	1,100.0		
Received	44,060.0		44,060.0								
14	454,370.0	0.0	129,977.5	56,176.0	2,708.6	0.0	84,884.9	161,922.5	18,700.5	0.0	0.0
USE	22,030.8		2,203.0	7,710.5			1,102.3	11,015.0			
Received	0.0										
15	432,339.2	0.0	127,774.5	48,465.5	2,708.6	0.0	83,782.6	150,907.5	18,700.5	0.0	0.0
USE	18,725.5			3,304.5			2,203.0	13,218.0			
Received	44,060.0							44,060.0			
16	457,673.7	0.0	127,774.5	45,161.0	2,708.6	0.0	81,579.6	181,749.5	18,700.5	0.0	0.0
USE	9,913.5			2,203.0				7,710.5			
Received	0.0										
17	447,760.2	0.0	127,774.5	42,958.0	2,708.6	0.0	81,579.6	174,039.0	18,700.5	0.0	0.0
USE	0.0										
Received	0.0										
18	447,760.2	0.0	127,774.5	42,958.0	2,708.6	0.0	81,579.6	174,039.0	18,700.5	0.0	0.0
USE	20,928.5			2,203.0			2,203.0	16,522.5			
Received	0.0										
19	426,831.7	0.0	127,774.5	40,755.0	2,708.6	0.0	79,376.6	157,516.5	18,700.5	0.0	0.0
USE	25,334.5		8,812.0	7,710.5			1,101.5	7,710.5			
Received	39,683.0						39,683.0				
20	441,180.2	0.0	118,962.5	33,044.5	2,708.6	0.0	117,958.1	149,806.0	18,700.5	0.0	0.0

Raw Material Inventory

Blue=Expanded
Red=Received
Black=Balance
Green=Sent Back

USE	19,827.0		6,609.0					13,218.0			
Received	44,060.0		44,060.0								
21	465,413.2	0.0	156,413.5	33,044.5	2,708.6	0.0	117,958.1	136,588.0	18,700.5	0.0	0.0
USE	0.0										
Received	0.0										
22	465,413.2	0.0	156,413.5	33,044.5	2,708.6	0.0	117,958.1	136,588.0	18,700.5	0.0	0.0
USE	0.0										
Received	0.0										
23	465,413.2	0.0	156,413.5	33,044.5	2,708.6	0.0	117,958.1	136,588.0	18,700.5	0.0	0.0
USE	0.0										
Received	0.0										
24	465,413.2	0.0	156,413.5	33,044.5	2,708.6	0.0	117,958.1	136,588.0	18,700.5	0.0	0.0
USE	0.0										
Received	0.0										
25	465,413.2	0.0	156,413.5	33,044.5	2,708.6	0.0	117,958.1	136,588.0	18,700.5	0.0	0.0
USE	0.0										
Received	0.0										
26	465,413.2	0.0	156,413.5	33,044.5	2,708.6	0.0	117,958.1	136,588.0	18,700.5	0.0	0.0
USE	24,237.0		11,015.0				5,511.5	7,710.5			
Received	44,060.0		44,060.0								
27	485,236.2	0.0	189,458.5	33,044.5	2,708.6	0.0	112,446.6	128,877.5	18,700.5	0.0	0.0
USE	0.0										
Received	44,060.0							44,060.0			
28	529,296.2	0.0	189,458.5	33,044.5	2,708.6	0.0	112,446.6	172,937.5	18,700.5	0.0	0.0
USE	25,838.1		15,421.0	2,203.0	503.6			7,710.5			
Received	0.0										
29	503,458.1	0.0	174,037.5	30,841.5	2,205.0	0.0	112,446.6	165,227.0	18,700.5	0.0	0.0
USE	24,236.2		8,812.0				4,409.2	11,015.0			
Received	0.0										
30	479,221.9	0.0	165,225.5	30,841.5	2,205.0	0.0	108,037.4	154,212.0	18,700.5	0.0	0.0
USE	0.0										
Received	0.0										
31	479,221.9	0.0	165,225.5	30,841.5	2,205.0	0.0	108,037.4	154,212.0	18,700.5	0.0	0.0
	0.0										
	0.0										
Balance	479,221.9	0.0	165,225.5	30,841.5	2,205.0	0.0	108,037.4	154,212.0	18,700.5	0.0	0.0

TOTALS	Daily	EVC334H	A5455	A6455	35MC	6455	R185B	5455	SFC-S	R-Mer	EVC334L
Expanded	335,977.3	0	52,872.0	52,873	2,205.9	0	39,676.4	185,051	3,300	0	0
Received	431,846.0	0	132,180	44,060	0.0	0	79,366.0	176,240	0	0	0
332,677.3		0.00	52.872	52.8725	2.2059	0	39.6764	185.0505	3.3	0	0
Pentane% Content		5.80%	4.70%	4.60%	4.90%	4.50%	5.40%	4.70%	6.40%	6.10%	4.70%
Lbs. Emmitted per 1000		49.30	39.95	39.10	41.65	38.25	45.90	39.95	54.40	51.85	39.95
Total		Left over material last month				16104		Actual	15299		
Pounds		Left over material this month				15,004		Actual	14254		
Used:	323,358	0	50,760	50,805	2,114	0	37,855	177,658	3,120	0	0
Prod:	322,312	Lbs.	Lbs.	Lbs.	Lbs.	Lbs.	Lbs.	Lbs.	Lbs.	Lbs.	Lbs.
ACTUAL	337,077	0	2,112	2,067	92	0	1,821	7,393	180	0	0
	6.83	Tons is the estimated pentane emission to date for this month.									

Bottom section is pentane emission information

Used: Total pounds used to produce parts (Pentane weight has been subtracted)
Prod: Total pounds expanded (Pentane weight has been subtracted)
ACTUAL Total pounds used to produce parts before pentane weight has been subtracted

Last	15004	Month	left	1100		16104
This	13704	Month	left	1300		15004
	333,977.3	← Pounds Used	→	3,100		337,077.3
	EPS			R-MER		
	EPS			R-MER		
	460,521.4	← Raw Material Inventory	→	18,700.5		479,221.9

ATTACHMENT D

BOILER EMISSION CALCULATIONS (ACTUAL - 2021)

05 - CLEAVER BROOKS BOILER

TEL 814-664-8103 | FAX 814-664-9689 | www.aegis-usa.com

Main Boiler Source 05

Actual Emissions

Foam Fabricators, Inc.
Source: Boiler 05
Cleaver Brooks Natural Gas Fired Boiler

24 hours per day
4.4 days per week
52 weeks per year
5491.2 hours per year

Summary

PM	0.12 tons/year
SO x	0.01 tons/year
NO x	1.61 tons/year
VOC	0.09 tons/year
CO	1.35 tons/year
Lead	0 tons/year
Methane	0.04 tons/year
TOC	0.18 tons/year
PM 2.5	0.09 tons/year
Ammonia	0.05 tons/year

Operation days/wk:
days/yr:
hrs/yr: 5491.2

Thru-put 0 MM BTU's /hr.
usage 32.22 MMcu.ft./year

Emission factors:

PM	7.6 lb/MM cu.ft.	
SO x	0.6 lb/MM cu.ft.	uncontrolled
NO x	100 lb/MM cu.ft.	uncontrolled
VOC	5.5 lb/MM cu.ft.	uncontrolled
CO	84 lb/MM cu.ft.	uncontrolled
Lead	0.0005 lb/MM cu.ft.	uncontrolled
Methane	2.3 lb/MM cu.ft.	uncontrolled
TOC	11 lb/MM cu.ft.	uncontrolled
PM 2.5	5.7 lb/MM cu.ft.	uncontrolled
Ammonia	3.2 lb/MM cu.ft.	uncontrolled

CALCULATIONS

Particulate (PM)

32.22 MM cu.ft./year	*	7.6 lb/MM cu.ft.	=	244.87 lb./year
244.872 lb./year	/	5491.2 operating hours/year	=	0.0446 lb./hour
244.872 lb./year	/	2000 lb./ton	=	0.1224 tons/year

Sulfur Dioxide (SO x)

32.22 MM cu.ft./year	*	0.6 lb/MM cu.ft.	=	19.332 lb./year
19.332 lb./year	/	5491.2 operating hours/year	=	0.0035 lb./hour
19.332 lb./year	/	2000 lb./ton	=	0.0097 tons/year

Nitrous Oxides (NO x)

32.22 MM cu.ft./year	*	100 lb/MM cu.ft.	=	3222 lb./year
3222 lb./year	/	5491.2 operating hours/year	=	0.5868 lb./hour
3222 lb./year	/	2000 lb./ton	=	1.611 tons/year

Volatile Organic Compounds (VOCs)

32.22 MM cu.ft./year	*	5.5 lb/MM cu.ft.	=	177.21 lb./year
177.21 lb./year	/	5491.2 operating hours/year	=	0.0323 lb./hour
177.21 lb./year	/	2000 lb./ton	=	0.0886 tons/year

Carbon Monoxide (CO)

32.22 MM cu.ft./year	*	84 lb/MM cu.ft.	=	2706.5 lb./year
2706.48 lb./year	/	5491.2 operating hours/year	=	0.4929 lb./hour
2706.48 lb./year	/	2000 lb./ton	=	1.3532 tons/year

Lead

32.22 MM cu.ft./year	*	0.0005 lb/MM cu.ft.	=	0.0161 lb./year
0.01611 lb./year	/	5491.2 operating hours/year	=	3E-06 lb./hour
0.01611 lb./year	/	2000 lb./ton	=	8E-06 tons/year

Methane

32.22 MM cu.ft./year	*	2.3000 lb/MM cu.ft.	=	74.106 lb./year
74.106 lb./year	/	5491.2 operating hours/year	=	0.0135 lb./hour
74.106 lb./year	/	2000 lb./ton	=	0.0371 tons/year

TOC

32.22 MM cu.ft./year	*	11.0 lb/MM cu.ft.	=	354.42 lb./year
354.42 lb./year	/	5491.2 operating hours/year	=	0.0645 lb./hour
354.42 lb./year	/	2000 lb./ton	=	0.1772 tons/year

PM 2.5

32.22 MM cu.ft./year	*	5.7 lb/MM cu.ft.	=	183.65 lb./year
183.654 lb./year	/	5491.2 operating hours/year	=	0.0334 lb./hour
183.654 lb./year	/	2000 lb./ton	=	0.0918 tons/year

Ammonia

32.22 MM cu.ft./year	*	3.2 lb/MM cu.ft.	=	103.1 lb./year
103.104 lb./year	/	5491.2 operating hours/year	=	0.0188 lb./hour
103.104 lb./year	/	2000 lb./ton	=	0.0516 tons/year

ATTACHMENT E

EPS PROCESS EMISSION CALCULATIONS (ACTUAL - 2021)

EPS001 - PRE-EXPANDERS
EPS002 - BAG STORAGE
EPS003 - MOLDING MACHINES
EPS004 - WAREHOUSE

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Foam Fabricators, Inc.; Jackson, TN
Twelve-Month Rolling Sum
Title V Permit #572557

	Material Expanded		Pentane Emissions Monthly		Natural Gas Monthly Usage	VOC Emissions From Combustion		Facility Wide Monthly VOC Emissions		Facility Wide VOC Emissions Twelve-Month Rolling Sum	
	Pounds	Tons	Pounds	Tons	mmcf	Pounds	Tons	Pounds	Tons	Pounds	Tons
Jan-20	326,013.00	163.01	12,000.00	6.00	3.39	18.65	0.01	12,018.65	6.01	164,556.81	82.28
Feb-20	319,910.00	159.96	12,820.00	6.41	3.36	18.48	0.01	12,838.48	6.42	163,077.09	81.54
Mar-20	371,083.00	185.54	14,440.00	7.22	3.46	19.03	0.01	14,459.03	7.23	165,799.84	82.90
Apr-20	322,087.00	161.04	13,100.00	6.55	3.16	17.38	0.01	13,117.38	6.56	164,500.28	82.25
May-20	308,618.00	154.31	12,600.00	6.30	3.15	17.33	0.01	12,617.33	6.31	163,459.45	81.73
Jun-20	389,118.00	194.56	15,900.00	7.95	3.77	20.74	0.01	15,920.74	7.96	164,341.16	82.17
Jul-20	359,755.00	179.88	14,880.00	7.44	3.85	21.18	0.01	14,901.18	7.45	166,265.94	83.13
Aug-20	379,454.00	189.73	15,620.00	7.81	3.60	19.80	0.01	15,639.80	7.82	167,247.15	83.62
Sep-20	441,234.00	220.62	19,020.00	9.51	4.36	23.98	0.01	19,043.98	9.52	171,412.82	85.71
Oct-20	419,696.00	209.85	17,120.00	8.56	4.06	22.33	0.01	17,142.33	8.57	172,333.42	86.17
Nov-20	340,370.00	170.19	14,620.00	7.31	3.36	18.48	0.01	14,638.48	7.32	173,973.59	86.99
Dec-20	434,534.00	217.27	18,120.00	9.06	4.10	22.55	0.01	18,142.55	9.07	180,479.91	90.24
Jan-21	333,294.00	166.65	14,280.00	7.14	3.37	18.54	0.01	14,298.54	7.15	182,759.80	91.38
Feb-21	275,367.00	137.68	11,700.00	5.85	2.82	15.51	0.01	11,715.51	5.86	181,636.83	90.82
Mar-21	426,232.00	213.12	17,700.00	8.85	3.57	19.64	0.01	17,719.64	8.86	184,897.44	92.45
Apr-21	303,899.00	151.95	12,740.00	6.37	2.99	16.45	0.01	12,756.45	6.38	184,536.50	92.27
May-21	318,555.00	159.28	13,340.00	6.67	3.09	17.00	0.01	13,357.00	6.68	185,276.17	92.64
Jun-21	355,758.00	177.88	14,840.00	7.42	3.35	18.43	0.01	14,858.43	7.43	184,213.86	92.11
Jul-21	358,000.00	179.00	14,720.00	7.36	3.42	18.81	0.01	14,738.81	7.37	184,051.50	92.03
Aug-21	352,459.00	176.23	14,420.00	7.21	3.76	20.68	0.01	14,440.68	7.22	182,852.38	91.43
Sep-21	331,526.00	165.76	13,760.00	6.88	3.40	18.70	0.01	13,778.70	6.89	177,587.10	88.79
Oct-21	360,209.00	180.10	15,100.00	7.55	3.34	18.37	0.01	15,118.37	7.56	175,563.14	87.78
Nov-21	349,183.00	174.59	14,620.00	7.31	3.69	20.30	0.01	14,640.30	7.32	175,564.95	87.78
Dec-21	335,977.00	167.99	13,660.00	6.83	3.47	19.09	0.01	13,679.09	6.84	171,101.49	85.55

85.44 tons of VOC from EPS Process Only - 2021

85.55 tons of VOC from EPS and Natural Gas Combustion - 2021

ATTACHMENT F

BOILER GHG EMISSION CALCULATIONS (ACTUAL - 2021)

05 - CLEAVER BROOKS BOILER

TEL 814-664-8103 | FAX 814-664-9689 | www.aegis-usa.com

Main Boiler Source 05

Actual Emissions

Foam Fabricators, Inc.
Source: Boiler 05
Cleaver Brooks Natural Gas Fired Boiler

24 hours per day
4.4 days per week
52 weeks per year
5491.2 hours per year

Summary

PM	0.12 tons/year
SO x	0.01 tons/year
NO x	1.61 tons/year
VOC	0.09 tons/year
CO	1.35 tons/year
Lead	0 tons/year
Methane	0.04 tons/year
TOC	0.18 tons/year
PM 2.5	0.09 tons/year
Ammonia	0.05 tons/year

Operation days/wk:
days/yr:
hrs/yr. 5491.2

Thru-put 0 MM BTU's /hr.
usage 32.22 MMcu.ft./year

Emission factors:

PM	7.6 lb/MM cu.ft.	
SO x	0.6 lb/MM cu.ft.	uncontrolled
NO x	100 lb/MM cu.ft.	uncontrolled
VOC	5.5 lb/MM cu.ft.	uncontrolled
CO	84 lb/MM cu.ft.	uncontrolled
Lead	0.0005 lb/MM cu.ft.	uncontrolled
Methane	2.3 lb/MM cu.ft.	uncontrolled
TOC	11 lb/MM cu.ft.	uncontrolled
PM 2.5	5.7 lb/MM cu.ft.	uncontrolled
Ammonia	3.2 lb/MM cu.ft.	uncontrolled

CALCULATIONS

Particulate (PM)

32.22 MM cu.ft./year	*	7.6 lb/MM cu.ft.	=	244.87 lb./year
244.872 lb./year	/	5491.2 operating hours/year	=	0.0446 lb./hour
244.872 lb./year	/	2000 lb./ton	=	0.1224 tons/year

Sulfur Dioxide (SO x)

32.22 MM cu.ft./year	*	0.6 lb/MM cu.ft.	=	19.332 lb./year
19.332 lb./year	/	5491.2 operating hours/year	=	0.0035 lb./hour
19.332 lb./year	/	2000 lb./ton	=	0.0097 tons/year

Nitrous Oxides (NO x)

32.22 MM cu.ft./year	*	100 lb/MM cu.ft.	=	3222 lb./year
3222 lb./year	/	5491.2 operating hours/year	=	0.5868 lb./hour
3222 lb./year	/	2000 lb./ton	=	1.611 tons/year

Volatile Organic Compounds (VOCs)

32.22 MM cu.ft./year	*	5.5 lb/MM cu.ft.	=	177.21 lb./year
177.21 lb./year	/	5491.2 operating hours/year	=	0.0323 lb./hour
177.21 lb./year	/	2000 lb./ton	=	0.0886 tons/year

Carbon Monoxide (CO)

32.22 MM cu.ft./year	*	84 lb/MM cu.ft.	=	2706.5 lb./year
2706.48 lb./year	/	5491.2 operating hours/year	=	0.4929 lb./hour
2706.48 lb./year	/	2000 lb./ton	=	1.3532 tons/year

Lead

32.22 MM cu.ft./year	*	0.0005 lb/MM cu.ft.	=	0.0161 lb./year
0.01611 lb./year	/	5491.2 operating hours/year	=	3E-06 lb./hour
0.01611 lb./year	/	2000 lb./ton	=	8E-06 tons/year

Methane

32.22 MM cu.ft./year	*	2.3000 lb/MM cu.ft.	=	74.106 lb./year
74.106 lb./year	/	5491.2 operating hours/year	=	0.0135 lb./hour
74.106 lb./year	/	2000 lb./ton	=	0.0371 tons/year

TOC

32.22 MM cu.ft./year	*	11.0 lb/MM cu.ft.	=	354.42 lb./year
354.42 lb./year	/	5491.2 operating hours/year	=	0.0645 lb./hour
354.42 lb./year	/	2000 lb./ton	=	0.1772 tons/year

PM 2.5

32.22 MM cu.ft./year	*	5.7 lb/MM cu.ft.	=	183.65 lb./year
183.654 lb./year	/	5491.2 operating hours/year	=	0.0334 lb./hour
183.654 lb./year	/	2000 lb./ton	=	0.0918 tons/year

Ammonia

32.22 MM cu.ft./year	*	3.2 lb/MM cu.ft.	=	103.1 lb./year
103.104 lb./year	/	5491.2 operating hours/year	=	0.0188 lb./hour
103.104 lb./year	/	2000 lb./ton	=	0.0516 tons/year

Extremely Urgent

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TITLE V PERMIT STATEMENT

Facility Name: Foam Fabricators, Inc
City: Jackson
County: Madison

Date Application Received: August 29, 2022
Date Application Deemed Complete: August 29, 2022

Emission Source Reference No.: 57-0221
Permit No.: 580745

INTRODUCTION

This narrative is being provided to assist the reader in understanding the content of the attached Title V operating permit. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-3-9-.02(11)(f)1.(v). The primary purpose of the Title V operating permit is to consolidate and identify existing state and federal air requirements applicable to Foam Fabricators, Inc and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

Acronyms

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

I. Identification Information

A. Source Description

Foam Fabricators, Inc manufactures expandable polystyrene for use in packaging, componentry, and proprietary products.

Emission Sources:

01: Expansion/molding of polystyrene beads using pentane as a blowing agent, consisting of pre-expanders, bag storage, molding machines, and warehouse storage.

05: 10.5 MMBtu/hr natural gas-fired primary boiler, ID #BL01

B. Facility Classification

1. Attainment or Non-Attainment Area Location

Area is designated as an attainment area for all criteria pollutants.

2. Company is located in a Class II area.

C. Regulatory Status

1. PSD/NSR

This facility ***would be*** considered a major source for **PSD** purposes, but has accepted an emission limitation to stay below the PSD applicability threshold.

2. Title V Major Source Status by Pollutant (Facility-Wide Table includes insignificant sources)

Pollutant	Is the pollutant emitted?	If emitted, what is the facility's status?		
		Major Source Status	Non-Major Source Status	Potential to Emit (tons per year)
PM	yes		yes	1.1
PM_{10}	yes		yes	1.1
SO_2	yes		yes	0.1
VOC	yes	yes		809.9
NO_X	yes		yes	9.2
CO	yes		yes	7.7
Individual HAP	yes		yes	<0.01
Total HAPs	yes		yes	<0.01
GHG (CO_2e)	yes		yes	n.d.

3. MACT Standards

List MACT Rule(s) if applicable:

This facility ***is not*** a major source for HAPs. This facility ***is not*** subject to a proposed or final MACT standard.

4. Program Applicability

Are the following programs applicable to the facility?

PSD (**no**) – The facility ***would be*** a major source for VOCs under PSD, but has accepted an emissions limit to stay below the PSD applicability threshold.

NSPS (**yes**) – This facility is subject to 40 CFR 60, Subpart Dc (Standards of Performance for New Stationary Sources – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units), for Source 05, the 10.5 MMBtu/hr primary boiler. The Source 08 8.4 MMBtu/hr secondary boiler (insignificant source) is not subject to 40 CFR 60, Subpart Dc, as it has a heat input rate of less than 10 MMBtu/hr.

NESHAP (**no**) – This facility is not subject to any NESHAP requirements. The Source 05 and Source 08 boilers are not subject to Subpart JJJJJJ as each is a gas-fired boiler under the following operational definition:

> Gas-fired boiler includes any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing, maintenance, or operator training on liquid fuel. Periodic testing, maintenance, or operator training on liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

MACT (**no**) – This facility is not subject to any MACT requirements.

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

The permittee is not required to file an accidental release plan pursuant to Section 112(r) of the Clean Air Act and 1200-03-32 of TAPCR.

D. CAM Plan

This facility is not currently subject to regulations under 40 CFR Part 64 (Compliance Assurance Monitoring) since the VOC emissions above 100 tons per year do not utilize and are not required to have a control device.

IV. Public Participation Procedures

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

1. EPA
2. State of Mississippi

B. Public Notice Date: June 20, 2025.

C. Public Hearing Date: Pending public notice period.

D. EPA Comments: Pending EPA review.

V. Significant Changes since Last Permit Issuance and Public Notice

1. No major modifications, minor modifications, or administrative amendments were issued in the duration of the previous Title V Operating Permit #572557. One operational flexibility change, consisting of a molding press replacement for Source 01, was approved for Title V Operating Permit #572557.