

PUBLIC NOTICE

Seaman Corporation 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 **Seaman Corporation** with a site address of 225 N Industrial Drive. They have applied for renewal of their existing major source (Title V) operating permit for their Fabric and Vinyl Coating 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:

Division of Air Pollution Control
Johnson City Environmental Field Office
2305 Silverdale Drive
Johnson City, TN 37601

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 source(s) may be addressed to Derek Briggs at (615) 979-0964 or by e-mail at Derek.Briggs@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 **May 9, 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, 500 James Robertson Parkway 7th Floor, Nashville, Tennessee 37243.
2. **E-mail:** Submit electronic comments to air.pollution.control@tn.gov.

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

Individuals with disabilities who wish to review information maintained at the above-mentioned depositories should contact the Tennessee Department of Environment and Conservation to discuss any auxiliary aids or services needed to facilitate such review. Such contact may be in person, by writing, telephone, or other means, and should be made no less than ten days prior to the end of the public comment period to allow time to provide such aid or services. Contact the Tennessee Department of Environment and Conservation ADA Coordinator, Davy Crockett Tower, 5th Floor, 500 James Robertson Parkway, Nashville, TN 37243, 1-(866)-253-5827. Hearing impaired callers may use the Tennessee Relay Service, 1-(800)-848-0298.

DRAFT TITLE V PERMIT STATEMENT (RENEWAL)

Facility Name: Seaman Corporation
City: Bristol
County: Sullivan

Date Application Received: January 10, 2024
Date Application Deemed Complete: January 10, 2024
Emission Source Reference No.: 82-0007
Permit No.: 582095

INTRODUCTION

This narrative is being provided to assist the reader in understanding the content of the attached Title V operating permit. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-03-09-.02(11)(f)1.(v). The primary purpose of the Title V operating permit is to consolidate and identify existing state and federal air requirements applicable to Seaman Corporation 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
NSR	New Source Review
PM	Particulate Matter
SO ₂	Sulfur Dioxide
VOC	Volatile Organic Compound
NO _x	Nitrogen Oxides
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
GHG	Greenhouse Gas
TPY	Tons Per Year
NESHAP	National Emission Standards for Hazardous Air Pollutants
MACT	Maximum Achievable Control Technology
GACT	Generally Available Control Technology
NSPS	New Source Performance Standards

I. Identification Information

A. Source Description

Fabric and Vinyl Coating facility. Operations include fabric coating and mixing with RTO (Regenerative Thermal Oxidizer) control. These products are used for truck tarps, commercial building roofing, liners for containers, liners for truck transport, liners for water barriers, and roll-up doors. The source is subject to NSPS Subpart VVV and Tenn. Comp. R. & Regs. 1200-03-18. The source has

agreed to limit HAP emissions to less than 10 ton for any individual HAPs and less than 25 tons for combined total HAPs affectively exempting the facility from the requirements of NESHAP Subpart OOOO.

List and describe emission source(s):

82-0007-01: Line 1: PVC Plastisol Vinyl / Fabric Coating with RTO Control:

PVC coatings are prepared in mixers. Knife over roll coater applies PVC coating to continuous web of vinyl coated fabric substrate previously coated on Line 2, or to a continuous web of uncoated nylon or polyester fabric substrate. After coating, material enters 8.5 MMBtu/hr natural gas fired oven for curing. This source is **not** subject to NSPS Subpart VVV, because it was constructed prior to the effective date.

82-0007-01: Line 2: PVC Primer Fabric Coating with RTO Control:

PVC primers are prepared in mixers. Pad roll coater applies primer to continuous web of uncoated nylon or polyester fabric substrate. After coating, material enters a 8.5 MMBtu/hr natural gas fired oven for curing. This source is **not** subject to NSPS Subpart VVV, because it was constructed prior to the effective date.

82-0007-06: Line 3: Urethane Primer Fabric Coating with RTO Control:

Urethane primers are prepared in mixers. Knife over roll coater applies polyurethane based coatings to continuous web of uncoated nylon or polyester fabric substrates. After coating, material enters steam-heated oven for curing. This source is subject to NSPS Subpart VVV.

82-0007-13: Line 10: Dry Blend Vinyl Coating “No” VOC Control:

Hot melt roll coater applying PVC or polyurethane based dry coatings to continuous web of coated fabric substrate previously coated on Lines 2, 3 or 11. A 3.2 MMBtu/hr gas fired oil heater provides roll heating for this line. This source is subject to NSPS Subpart VVV.

82-0007-02: Line 11: Vinyl / Fabric Coating with RTO Control:

PVC Coatings are prepared in mixers. Pad roll or knife over roll coating heads coating to a continuous web of uncoated fabric or vinyl coated substrate. After coating material enters an oil heated oven for curing. Oven heat is provided by a 3.5 MMBtu/hr gas fired oil heater. This source is subject to NSPS Subpart VVV. The permittee submitted data and a letter dated June 3, 2019, demonstrating that the line 11 (source 02) qualifies for the limited requirements (< 95 megagrams of VOC usage) of 40 CFR 60 Subpart VVV.

82-0007-08: PVC Resin Silos with Fabric Filter Control:

Two (2) Vertical silos for storage of dry, granular PVC resin. Emissions only occur during filling. Baghouses are used for PM emissions control.

82-0007-09: Dry Blend Mixer with Fabric Filter Control:

Mixes dry ingredients into dry blend for use on Line 10. This source is subject to NSPS Subpart VVV.

82-0007-03: Boiler 9.9 MMBtu/hr (Natural Gas-Fired)

B. Facility Classification

1. Attainment or Non-Attainment Area Location

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

2. Company *is* located in a ***Class II area*** (This means that the facility is not located within a national park or national wilderness area; see 40 CFR 52.21(e) for complete definition).

C. Regulatory Status**1. PSD/NSR**

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

2. Title V Major Source Status by Pollutant

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

3. MACT Standards

This facility *is not* a major source for HAPs. This facility is subject to a final MACT Standard as an area source. List MACT Rule(s) if applicable:

Fabric Coating: 40 CFR part 63 subpart OOOO

4. Program Applicability

Are the following programs applicable to the facility?

PSD (*yes, facility has undergone PSD review. Any further changes will require a PSD analysis.*)

NESHAP (*yes, area source for MACT: 40 CFR 63 Subpart OOOO*)

NSPS (*yes, 40 CFR 61, Subpart VVV*)

II. Compliance Information**A. Compliance Status**

Is the facility currently in compliance with all applicable requirements? *Yes*

The only compliance issue concerns the plant wide allowable VOC emission limit of 244.80 tons per year as specified in permit 573891. This is only a concern as the facility has voluntarily elected to reduce VOC emissions via the use of an RTO and actual emissions are significantly lower. The facility has agreed in the letter dated April 10, 2024, to a VOC emission limit of 244.80 tons per 12-consecutive months for the purpose of PSD avoidance. The emission limit was established pursuant to TAPCR 1200-03-07-.07(2), TAPCR 1200-03-18-.02(2), and the letter dated April 10, 2024.

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.

This facility *is not* subject to TAPCR 1200-03-32.

IV. Public Participation Procedures

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

1. EPA-Region 4
2. State of North Carolina-Division of Environmental Management, Air Quality Section
3. State of Virginia- Virginia Dept. of Environmental Quality

Public Participation Important Dates:

EPA concurrent review requested	<u>Yes</u>
Public Notice publication date	<u>April 10, 2025</u>
Public Notice period completion date	<u>May 9, 2025</u>
Public Notice publication comments	<u>TBD</u>
EPA review period completion date	<u>May 27, 2025</u>
EPA review comments	<u>TBD, 2025</u>

V. Permit History:

Title V Operating Permit No. 582095 represents the fifth renewal of the original Title V Permit No. 548468 issued July 23, 1998. The following changes have occurred since the first Title V permit was issued.

1. Minor Modification #1 issued February 16, 2000

The facility added another fabric coating line. This process is subject to NSPS (40 CFR 60, Subpart VVV) and will use a regenerative thermal oxidizer as control for VOC and HAP emissions. Maximum increase in actual emissions expected from this project is 163.2 tons per year. The facility expects to stay below their facility wide VOC limit of 244.8 tons per year. The HAP emissions are also expected to be below the facility wide limit of 9.9 tons per year of single HAP and 24.9 tons per year of combined HAPs. There are no new applicable requirements.

2. Minor Modification #2 issued

A new PVC resin silo (#2) with baghouse control was added.

3. Construction Permit #957846P issued on January 18, 2005

Modification of coating line #3 (Source 06) to accommodate wider fabric webs.

4. Permit Renewal #560398 issued on October 23, 2007**5. Minor Modification #1 to Permit #560398 issued on March 3, 2008**

Addition of coating line #11 and removal of coating line #7.

6. Minor Modification #2 to Permit #560398 issued on December 29, 2011

Addition of storage silo #2 (Source 12).

7. Permit Renewal #566036 issued on September 13, 2013

8. Permit Renewal #573891 issued on July 11, 2019

The two silos were combined into the same source (80-0007-08). Coating lines 1 and 2 were combined and are now identified as source 01. Source 01 was constructed prior to the effective date and is not subject to 40 CFR 60 Subpart VVV. The permittee requested that coating line 11 (identified as source 02) be allowed to operate under limited requirements of 40 CFR 60, Subpart VVV. Source 02 and source 13 (coating line 10) are only subject to the requirements of §§60.744(b), 60.747(b), and 60.747(c). Coating line 3 (identified as source 06) is subject to the full requirements of 40 CFR 60, Subpart VVV. In an email received by the permittee dated May 28, 2019, the permittee noted that propane is no longer available at the facility. Thus, propane usage was removed from the permit.

During the 2010 destruction efficiency testing of coating lines 1, 3, and 11, the destruction efficiency was 98.7% at an average temperature of 1558 degrees Fahrenheit. Credit for the destruction efficiency can only be given to coating lines 1, 3, and 11. If the permittee desires credit for coating line 2, emission testing would be required. Coating lines 1 and 11 are located in rooms meeting the requirements for permanent total enclosure (PTE). The capture efficiency of coating line 3 was measured by liquid to gas material balance. This measurement resulted in a capture efficiency of more than 90%, meeting the requirements of 40 CFR 60, Subpart VVV.

The permittee submitted data, and a letter dated June 3, 2019, demonstrating that the line 11 (source 02) qualifies for the limited requirements (< 95 megagrams of VOC usage) of 40 CFR 60, Subpart VVV. The permittee proposed operating line 11 without PTE. Since records indicate that the source did not exceed the threshold; therefore, coating line 11 is not subject to the full requirement under Subpart VVV. If coating line 11 is operated without PTE, credit for RTO control cannot be given for destruction efficiency for this line.

The permittee proposed retesting of the coating lines due to chances in the operation of coating line 11. The permittee will be allowed credit for capture and destruction efficiency for line 11 based on the outcome of the new emission test. Most likely a permit amendment would be required, if testing results show significant changes in capture and control.

All coating lines are subject to Tenn. Comp. R. & Regs. 1200-03-18. The permittee shall not cause or allow the application of any coating or ink, on any vinyl coating line, with VOC content in excess 3.8 pounds per gallon (0.33 lbs/lbs) of coating or ink, excluding water and/or exempt compounds, as applied. In addition, the permittee shall not cause or allow the application of any coating, on any fabric coating line, with VOC content that exceed 2.9 (0.25 lbs/lbs) pound per gallon of coating, excluding water and/or exempt compounds, as applied. The VOC content was converted to pound of VOC per pound of coating using the density of information submitted on June 3, 2019, using a worst-case scenario of 11.6 pounds per gallon of coating.

9. Permit Renewal #582095 issued on TBD, 2024

Conditions A1 through E2 have been updated with the most recent approved standard language.

Condition E3-1a updated to reflect new Responsible Official Dave Dehlman.

Condition E3-4 updated to use latest standard language and provide clarity on recordkeeping for as-supplied and as-applied VOC/HAP coatings.

Conditions E3-7, E3-9, E3-11, E3-14, E4-3, E8-1, E9-1, E9-2, E9-3, E9-4, E9-5, E9-6, and E10-1 updated to use latest standard language and provide additional clarity on compliance.

Added Condition E3-15 for clarity on capture and control efficiency.

Removed Condition E10-2 due to it now being the compliance method for Condition E10-1.

Added Attachment 3: PSD Avoidance/VOC Agreement Letter, added Attachment 4: 9.9 MMBtu/hr Boiler AP-42 Emission Factor Agreement Letter, and added Attachment 5: APC 36 – Title V Fee Selection Form.

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



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

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

Date Issued: TBD, 2025

Permit Number: 582095

Date Expires: TBD, 2030

Issued To:

Seaman Corporation

Installation Address:

225 N. Industrial Drive
Bristol

Installation Description: Fabric and Vinyl Coating Operation

82-0007-01: Line 1: PVC Plastisol Vinyl / Fabric Coating with RTO Control
82-0007-01: Line 2: PVC Primer Fabric Coating with RTO Control
82-0007-06: Line 3: Urethane Primer Fabric Coating with RTO Control
82-0007-13: Line 10: Dry Blend Vinyl Coating "without" Control
82-0007-02: Line 11: Vinyl / Fabric Coating with RTO Control
82-0007-08: PVC Resin Silos with Fabric Filter Control
82-0007-09: Dry Blend Mixer with Fabric Filter Control
82-0007-03: Boiler 9.9 MMBtu/hr (Gas-Fired)

NSPS Subpart VVV
NESHAP Subpart OOOO

Emission Source Reference No.: 82-0007

Renewal Application Due Date:

Between TBD, 2029 and TBD, 2029

Primary SIC: 313320

Information Relied Upon:

Application dated January 10, 2024

(continued on the next page)

TECHNICAL SECRETARY

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

POST AT INSTALLATION ADDRESS

CONTENTS

SECTION A

GENERAL PERMIT CONDITIONS

A1.	Definitions.....	1
A2.	Compliance requirement	1
A3.	Need to halt or reduce activity	1
A4.	The permit.....	1
A5.	Property rights.....	1
A6.	Submittal of requested information	1
A7.	Severability clause	2
A8.	Fee payment	2
A9.	Permit revision not required	2
A10.	Inspection and entry	2
A11.	Permit shield	3
A12.	Permit renewal and expiration.....	3
A13.	Reopening for cause	3
A14.	Permit transference	4
A15.	Air pollution alert	4
A16.	Construction permit required	4
A17.	Notification of changes	4
A18.	Schedule of compliance	4
A19.	Title VI.....	4
A20.	112 (r).....	5

SECTION B

GENERAL CONDITIONS for MONITORING, REPORTING, and ENFORCEMENT

B1.	Recordkeeping	6
B2.	Retention of monitoring data	6
B3.	Reporting.....	6
B4.	Certification.....	6
B5.	Annual compliance certification	6
B6.	Submission of compliance certification.....	7
B7.	Reserved.....	7
B8.	Excess emissions reporting	7
B9.	Malfunctions, startups and shutdowns - reasonable measures required	7
B10.	Reserved.....	8
B11.	Report required upon the issuance of notice of violation.....	8

CONTENTS

SECTION C

PERMIT CHANGES

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

SECTION D

GENERAL APPLICABLE REQUIREMENTS

D1.	Visible emissions	11
D2.	General provisions and applicability for non-process gaseous emissions	11
D3.	Non-process emission standards	11
D4.	General provisions and applicability for process gaseous	11
D5.	Particulate emissions from process emission sources	11
D6.	Sulfur dioxide emission standards	11
D7.	Fugitive dust.....	11
D8.	Open burning	12
D9.	Asbestos	12
D10.	Annual certification of compliance.....	12
D11.	Emission Standards for Hazardous Air Pollutants	12
D12.	Standards of Performance for New Stationary Sources	12
D13.	Gasoline Dispensing Facilities	12
D14.	Internal Combustion Engines	12
D15.	Maintenance	12

CONTENTS

SECTION E

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

E1.	Fee payment: actual emissions basis	13
E2.	Reporting requirements	15
E3.	General Permit Conditions	17
E4.	Line 1-PVC Plastisol Vinyl Coating Line	22
E4.	Line 2-PVC Primer Fabric Coating Line	22
E5.	Line 3-Urethane Primer Fabric Coating Line	24
E6.	Line 11-Dry Blend Vinyl coating line	26
E7.	Line 10-Dry Blend Vinyl coating line	27
E8.	Dry Blend Mixer	28
E9.	Boiler	29
E10.	PVC Resin Silos	30

END OF DRAFT PERMIT NUMBER 582095	31
--	-----------

ATTACHMENT 1	Opacity Matrix Decision Tree for EPA Method 9	1 page
ATTACHMENT 2	Chapter 18 Compliance Calculations	1 page
ATTACHMENT 3	PSD Avoidance/VOC Agreement Letter	1 page
ATTACHMENT 4	9.9 MMBtu/hr Boiler AP-42 Emission Factor Agreement Letter	2 pages
ATTACHMENT 5	APC 36 – Title V Fee Selection Form	2 pages

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 PM₁₀) 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. §68-201-109 (emergency orders) including the authority of the Governor under the section;
 2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Federal Act; or
 4. The ability of EPA to obtain information from a source pursuant to section 114 of the Federal Act.
- (c) Permit shield is granted to the permittee.
- (d) The permit shield does not apply to permit changes made under the minor permit modification procedures of TAPCR subpart 1200-03-09-.02(11)(f)5(ii) nor the administrative permit amendment procedures of TAPCR part 1200-03-09-.02(11)(f)4, except that the permit shield may be extended for administrative permit amendments that meet the relevant requirements of TAPCR subparagraph 1200-03-09-.02(11)(e), subparagraph 1200-03-09-.02(11)(f) and subparagraph 1200-03-09-.02(11)(g) for significant permit modifications.
- (e) The permit shield does not apply to off-permit changes made under the operational flexibility provisions of TAPCR part 1200-03-09-.02(11)(a)4.

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

A12. Permit renewal and expiration.

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

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

A13. Reopening for cause.

- (a) A permit shall be reopened and revised prior to the expiration of the permit under any of the circumstances listed below:
1. Additional applicable requirements under the Federal Act become applicable to the sources contained in this permit provided the permit has a remaining term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the permit expiration date of this permit, unless the original has been extended pursuant to TAPCR part 1200-03-09-.02(11)(a)2.
 2. Additional requirements become applicable to an affected source under the acid rain program.
 3. The Technical Secretary or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 4. The Technical Secretary or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (b) Proceedings to reopen and issue a permit shall follow the same proceedings as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists, and not the entire permit. Such reopening shall be made as expeditiously as practicable.
- (c) Reopenings for cause shall not be initiated before a notice of such intent is provided to the permittee by the Technical Secretary at least 30 days in advance of the date that the permit is to be reopened except that the Technical Secretary may provide a shorter time period in the case of an emergency. An emergency shall be established by the criteria of T.C.A. 68-201-109 or other compelling reasons that public welfare is being adversely affected by the operation of a source that is in compliance with its permit requirements.
- (d) If the Administrator finds that cause exists to terminate, modify, or revoke and reissue a permit as identified in A13, 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 1200-03-09-.02(11)(e)6 for such revisions made pursuant to item (c) of this condition which meet the relevant requirements of TAPCR subparagraph 1200-03-09-.02(11)(e), TAPCR subparagraph 1200-03-09-.02(11)(f) and TAPCR subparagraph 1200-03-09-.02(11)(g) for significant permit modifications.
 - (c) Proceedings to review and grant administrative permit amendments shall be limited to only those parts of the permit for which cause to amend exists, and not the entire permit.

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

- C4. Minor permit modifications.**
- (a) The permittee may submit an application for a minor permit modification in accordance with TAPCR subpart 1200-03-09-.02(11)(f)5(ii).
 - (b) The permittee may make the change proposed in its minor permit modification immediately after an application is filed with the Technical Secretary.
 - (c) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.
 - (d) Minor permit modifications do not qualify for a permit shield.

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

C5. Significant permit modifications.

(a) The permittee may submit an application for a significant modification in accordance with TAPCR subpart 1200-03-09-.02(11)(f)5(iv).

(b) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.

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

C6. New construction or modifications.

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

(a) The permittee shall designate in their construction permit application the route that they desire to follow for the purposes of incorporating the newly constructed or modified sources into their existing operating permit. The Technical Secretary shall use that information to prepare the operating permit application submittal deadlines in their construction permit.

(b) Sources desiring the permit shield shall choose the administrative amendment route of TAPCR part 1200-03-09-.02(11)(f)4 or the significant modification route of TAPCR subpart 1200-03-09-.02(11)(f)5(iv).

(c) Sources desiring expediency instead of the permit shield shall choose the minor permit modification procedure route of TAPCR subpart 1200-03-09-.02(11)(f)5(ii) or group processing of minor modifications under the provisions of TAPCR subpart 1200-03-09-.02(11)(f)5(iii) as applicable to the magnitude of their construction.

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

SECTION D

GENERAL APPLICABLE REQUIREMENTS

D1. Visible emissions.

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

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

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

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

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

D3. Non-process emission standards. The permittee shall not cause, suffer, allow, or permit particulate emissions from non-process sources in excess of the standards in TAPCR Chapter 1200-03-06.**D4. General provisions and applicability for process gaseous emissions.** Any person constructing or otherwise establishing an air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize equipment and technology which is deemed reasonable and proper by the Technical Secretary.

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

D5. Particulate emissions from process emission sources. The permittee shall not cause, suffer, allow, or permit particulate emissions from process sources in excess of the standards in TAPCR part 1200-03-07.**D6. Sulfur dioxide emission standards.** The permittee shall not cause, suffer, allow, or permit sulfur dioxide emissions from process and non-process sources in excess of the standards in TAPCR Chapter 1200-03-14. Regardless of the specific emission standard, new process sources shall utilize the best available control technology as deemed appropriate by the Technical Secretary of the Tennessee Air Pollution Control Board.**D7. Fugitive Dust.**

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

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

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

TAPCR 1200-03-08

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

TAPCR 1200-03-04

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

TAPCR 0400-30-38-.01(2) and 40 CFR, Part 61

- D10. Annual certification of compliance.** The generally applicable requirements set forth in Section D of this permit are intended to apply to activities and sources that are insignificant emission units or activities. By annual certification of compliance with the conditions in this Section the permittee shall be considered to meet the monitoring and related record keeping and reporting requirements of TAPCR subpart 1200-03-09-.02(11)(e)1(iii) and part 1200-03-10-.04(2)(b)1 and the compliance requirements of TAPCR subpart 1200-03-09-.02(11)(e)3(i). The permittee shall submit compliance certification for these conditions annually.

- D11. Emission Standards for Hazardous Air Pollutants.** The permittee shall comply with all applicable requirements of TAPCR Chapter 0400-30-38 for all emission sources subject to a requirement contained therein.

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

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

- D14. Internal Combustion Engines.**

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

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

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

TAPCR 0400-30-38 and 39

- D15. Maintenance.** 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

82-0007	<u>Facility Description:</u>	Fabric and Vinyl Coating Facility. Operations include mixing and coating of uncoated nylon or polyester fabric and vinyl coated fabric substrate.
----------------	-------------------------------------	---

Conditions E1 through E10 apply to all sources in Section E of this permit unless otherwise noted.
--

E1. Fee payment

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 82-0007

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	70.7	AEAR	
SO₂	2.9	AEAR	
VOC	244.8	AEAR	Includes all VOC and HAP fee emissions.
NO_x	N/A	AEAR	
Facility-Wide Total HAP Limit	N/A	AEAR	Fee emissions are included in VOC above
Facility-Wide Individual HAP Limit	N/A	AEAR	Fee emissions are included in VOC above
HAZARDOUS AIR POLLUTANTS (HAPs) NOT INCLUDED ABOVE*			
		AEAR	
		AEAR	
		AEAR	
MISCELLANEOUS POLLUTANTS NOT LISTED ABOVE**			
EACH MISC POLLUTANT NOT LISTED ABOVE			
		AEAR	
		AEAR	
		AEAR	
		AEAR	

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, 2024** and ends **June 30, 2025**. The next AAP begins **July 1, 2025** and ends **June 30, 2026** unless a request to change the annual accounting period is submitted by the responsible official as required by subparagraph 1200-03-26-.02(9)(b) of the TAPCR and approved by the Technical Secretary. If the permittee wishes to revise their annual accounting period or their annual emission fee basis as allowed by subparagraph 1200-03-26-.02(9)(b) of the TAPCR, the responsible official must submit the request to the Division in writing on or before December 31 of the annual accounting period for which the fee is due. If a change in fee basis from allowable emissions to actual emissions for any pollutant is requested, the request from the responsible official must include the methods that will be used to determine actual emissions. **Changes in fee bases must be made using the Title V Fee Selection form, form number APC 36 (CN-1583), included as an attachment to this permit and available on the Division of Air Pollution Control's website.**

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

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

- (1) **each regulated pollutant** (Particulate matter [PM], SO₂, 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

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** 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
Old permit #573891	January 1, 2025	day before new permit issuance (with year)
New permit #582095	Issuance Date of new permit (with year)	June 30, 2025

These semiannual reports shall include:

- (1) Any monitoring and recordkeeping required by conditions **E3-5, E3-6, E3-14, E5-6, E6-4, E7-4, and E9-1** of this permit. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.

- (2) The visible emission evaluation readings from condition **E3-2** of this permit if required. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (3) Identification of all instances of deviations from **ALL PERMIT REQUIREMENTS**. The record of deviations/excursions shall include, at a minimum, the time the deviation/excursion was discovered, the corrective action taken, and the time that the deviation/excursion was rectified.

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

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

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

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

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

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

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

Permit Number	Reporting Period Begins	Reporting Period Ends
Old permit #573891	January 1, 2025	day before new permit issuance (with year)
New Permit #582095	Issuance Date of new permit (with year)	December 31, 2025

These certifications shall be submitted to:

TN APCD and EPA

**Division of Air Pollution Control
Johnson City Environmental Field Office
2305 Silverdale Drive
Johnson City, TN 37601
or
APC.JCEFO@tn.gov**

and

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

- (c) **NSPS semiannual reports.** The permittee shall submit NSPS semiannual reports of the recorded information outlined below. The report shall be due within 60 days after the end of each reporting period identified in **Condition E2(a)** of this permit. 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(es) below:

Division of Air Pollution Control Davy Crockett Tower 500 James Robertson Parkway, 7 th Floor Nashville, TN 37207	<u>or</u>	Portable Document Format (pdf) email to: Air.Pollution.Control@tn.gov
---	------------------	---

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

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

E3. General Permit Requirements

E3-1. Identification of Responsible Official, Technical Contact, and Billing Contact

- a) The application that was utilized in the preparation of this permit is dated January 10, 2024, and signed by Dave Dehlman, Vice President of Operations, for the permitted facility. If this person terminates employment or is assigned different duties and is no longer a Responsible Official for this facility as defined in part 1200-03-09-.02(11)(b)21 of the Tennessee Air Pollution Control Regulations, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty (30) days of the change. The notification shall include the name and title of the new Responsible Official and certification of truth and accuracy. All representations, agreement to terms and conditions, and covenants made by the former Responsible Official that were used in the establishment of the permit terms and conditions will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements, and/or covenants.
- b) The application that was utilized in the preparation of this permit is dated January 10, 2024, and identifies Andrew Shimko as the Principal Technical Contact for the permitted facility. If this person terminates employment or is assigned different duties and is no longer the Principal Technical Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty (30) days of the change. The notification shall include the name and title of the new Principal Technical Contact and certification of truth and accuracy.
- c) The application that was utilized in the preparation of this permit is dated January 10, 2024, and identifies Andrew Shimko as the Billing Contact for the permitted facility. If this person terminates employment or is assigned different duties and is no longer the Billing Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty (30) days of the change. The notification shall include the name and title of the new Billing Contact and certification of truth and accuracy.

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

- E3-2.** Visible emissions from all stacks at this facility shall not exhibit greater than twenty percent (20%) opacity, except for one (1) six-minute period in any one (1) hour period and for no more than four (4) six-minute periods in any twenty-four (24) hour period. Visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

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

Compliance Method: Compliance with this opacity limitation shall be certified through utilization of the Division's Opacity Matrix dated June 18, 1996, amended September 11, 2013, using EPA Method 9 that is enclosed as Attachment 1.

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

- E3-3.** Record keeping requirements for this facility, including all data and calculations, must be updated and maintained based on the following schedule:

<u>Record Keeping Type</u>	<u>Update Requirement</u>
Monthly Log	Recorded within 30 days after the end of the month
Weekly Log	Recorded within 7 days after the end of the week
Daily Log	Recorded within 7 days after the end of the day

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

- E3-4.** The as-supplied VOC and HAP content of all VOC and HAP-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 and HAP content by weight. If new materials are used, or if material formulation is changed, logs used to calculate emissions of VOC and HAP shall be updated within 30 days from the initial date of usage of the new or altered material.

The as-applied HAP content of all HAP-containing materials (all coatings, inks, adhesives, thinners, and solvents) to be used by this source shall be determined by using either EPA Method 311 of appendix A of 40 CFR part 63 or Safety Data Sheet (SDS) or vendor formulation data which explicitly list the HAP content by weight. The volatile organic content must be determined by EPA Method 24 of appendix A of 40 CFR part 60, or Safety Data Sheet (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 and HAP shall be updated within 30 days from the initial date of usage of the new or altered material.

Compliance Method: The results of the determinations for all VOC- and HAP-containing materials shall be compiled in the following tabular format or an alternative format which readily provides the same required information. This table, along with purchase orders and/or invoices for all VOC- and HAP-containing materials, along with current SDS, must be maintained and kept available for inspection by the Technical Secretary or a Division representative. The SDS must explicitly list the VOC and HAP content by weight for all VOC- and HAP-containing materials. If SDS are not available with this information, vendor formulation data containing the required information for those materials must also be maintained. These records must be retained in accordance with **Condition E2(d)**. Scanned documents (maintained electronically) may be used to fulfill this requirement.

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

Coatings used as supplied

Process Material Description	Material Density (lbs/gal)	VOC Content (% weight)	HAP Content (% weight)
Material #1			
Material #2			
Etc.			

Coatings used as applied (produced on site)

Process Material Description	Material Density (lbs/gal)	VOC Content (% weight)	HAP Content (% weight)
Material #1			
Material #2			
Etc.			

- E3-5.** The permittee shall keep records for each calendar month of the usage rate and VOC and HAP emissions of each adhesive and clean-up solvent, used at this facility, which are not used as constituents of the fabric or vinyl coatings. The value shall be added to the facility wide emission in accordance with **Condition E3-6**. This information must be maintained at the source location and kept available for inspection by the Technical Secretary's representative for five years.

PLANTWIDE CLEAN-UP SOLVENT AND ADHESIVE USE

Month ____/Year ____

MATERIAL NAME	Material Usage (lbs/month)	VOC in Material (lbs/lbs)	VOC emissions (lbs/month)*	HAP content (%)	HAP emissions (lbs/month)
Material ₁					
Material ₂					

Material _i					
Total					

* VOC emissions in lbs/month = (material usage in lbs) X (0.1 lbs of VOC emitted / lbs material usage); this is based on the company's statement that the clean up solvent is partly recovered). The emission factor of 0.1 lbs emissions/ lbs of VOC comes from EPA's FIRE database, version 6.22 (for SCC 4-02-011-05)

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

- E3-6.** Combined VOC emissions for this facility shall not exceed 244.8 tons during all intervals of 12-consecutive months. Emissions of any hazardous air pollutant (HAP) listed in Section 112 of the Federal Clean Air Act shall not exceed 9.9 tons during all intervals of 12 consecutive months. Emissions of any combination of HAPs shall not exceed 24.9 tons during all intervals of 12 consecutive months.

This facility is subject to the requirements found in MACT Rule for Printing, Coating, and Dyeing of Fabrics and Other Textiles (40 CFR part 63 subpart OOOO). This facility shall emit less than 9.9 tons during all intervals of 12-consecutive months of any single hazardous air pollutant and less than 24.9 tons during all intervals of 12-consecutive months of any combination of hazardous air pollutants. Compliance with these limitations shall insure that the facility meets the definition of an area source under the MACT Rule for Printing, Coating, and Dyeing of Fabrics and Other Textiles (40 CFR 63 Subpart OOOO). In the event that these limits are exceeded, this facility shall comply with all requirements found in 40 CFR 63 Subpart OOOO-MACT Rule for Printing, Coating, and Dyeing of Fabrics and Other Textiles.

TAPCR 1200-03-07-.07(2), 40 CFR Part 63 Subpart OOOO, the signed permit application dated January 10, 2024, and the agreement letter dated April 10, 2024. The VOC limit was established to avoid PSD by voluntary use of an RTO.

Compliance Method: The permittee shall keep records for each coating line in the following format or an alternative format which readily provides the same required information to show compliance with the above limits.

MONTHLY VOC/HAP EMISSIONS LOG

MONTH:

Material Name	Usage (lbs per month)	VOC Content (lbs VOC per lbs)	(**)VOC Emissions (tons VOC per month)	HAP ₁ Content (lbs HAP ₁ per lbs)	(**)HAP ₁ Emissions (tons HAP ₁ per month)	HAP _p Content (lbs HAP _p per lbs)	(**)HAP _p Emissions (tons HAP _p per month)	(**)Total HAP Emissions (tons HAP ₁ thru HAP _p per month)
Material ₁								
Material ₂								
Material _i								
TOTAL								

Note: i = 1, 2, 3,... n, where n represents the number of different materials, and p = 1, 2, 3,... m, where m represents the number of different hazardous air pollutants. The permittee shall add additional columns and rows as necessary.

YEARLY VOC/HAP EMISSIONS LOG

Month, Year	VOC Emissions (tons VOC per month)	(*)VOC Emissions (tons VOC per 12 months)	HAP ₁ Emissions (tons HAP ₁ per month)	(*)HAP ₁ Emissions (tons HAP ₁ per 12 months)	HAP _p Emissions (tons HAP _p per month)	(*)HAP _p Emissions (tons HAP _p per 12 months)	Total HAP Emissions (tons HAP ₁ through HAP _p per month)	(*)Total HAP Emissions (tons HAP ₁ through HAP _p per 12 months)
January, Year								
February, Year								
etc.								

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

(**) The emissions of VOC and HAP controlled by RTO is calculated by multiplying VOC and HAP generated by (1-overall reduction efficiency) established by the most recent source test. Based on 2010 emission testing of coating lines 1, 3, and 11, the capture and control efficiency of the RTO was 98.7% at an average temperature of 1558 degrees Fahrenheit.

TAPCR 1200-03-10

- E3-7.** Only natural gas shall be used as fuel for sources at this facility, including the RTO. Should the permittee need to modify the sources to allow the use of a fuel other than natural gas, a Title V modification shall first be applied for and received in accordance with 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 annually certify compliance with this condition at the address listed in **Condition E2(b)**.

- E3-8.** Particulate matter, sulfur dioxide, VOC, and nitrogen oxides (NO_x) emissions from fuel usage at this facility (82-0007) shall be calculated and maintained by record keeping of the following usage logs. These logs shall be used in the actual emissions analysis required by **Condition E1** of this permit. They must be retained for a period of not less than five years and shall be made available for review upon request of the Technical Secretary's representative.

MONTHLY COMBUSTION EMISSIONS LOG FOR SOURCE 82-0007

MONTH/YEAR (Fee Accounting Period is July 1 thru June 30 of the following year)	Boiler, Ovens, and RTO Natural Gas Usage (standard cubic feet per month)
July/year	
Aug/year, etc	
Jun/year	
Total	NGU12

EQUATIONS FOR THE NATURAL GAS EMISSIONS LOG CALCULATIONS FOR SOURCE 82-0007:

1. PM Emissions (tons PM per year) = (NGU12 in scf/12 months)(ef=7.6 pounds PM/10⁶scf)/(2000 lbs/ton)
 2. NO_x Emissions (tons NO_x per year) = (NGU12 in scf/12 months)(ef = 100 pounds NO_x/10⁶ scf)/(2000 lbs/ton) + (NGRTO12 in scf/12 months)(ef= 168 pounds NO_x/10⁶ scf)/(2000lb/ton)
 3. SO₂ Emissions (tons SO₂ per year) = (NGU12 in scf/12 months)(ef= 0.6 pounds SO₂/10⁶ scf)/(2000 lbs/ton)
 4. VOC Emissions (tons VOC per year) = (NGU12 in scf/12 months)(ef= 5.5 pounds VOC/10⁶ scf)/(2000 lbs/ton)
- Where ef = natural gas combustion emission factor from AP-42 Fifth Edition, Supplement D (July 1998) and RTO manufacturer's data

YEARLY COMBUSTION EMISSIONS LOG FOR SOURCE 82-0007

YEAR (Fee Accounting Period is July 1 thru June 30 of the following year)	PM EMISSIONS (tons PM per year)	VOC EMISSIONS (tons VOC per year)	SO ₂ EMISSIONS (tons SO ₂ per year)	NO _x EMISSIONS (tons NO _x per year)

TAPCR 1200-03-26

- E3-9.** 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.

- E3-10.** Unless otherwise noted, the sources required to be controlled by the RTO and baghouses shall not operate unless the control device(s) is in operation. In the event a malfunction/failure of a control device(s) occurs, the operation of the process(es) controlled by the control device(s) shall be regulated by the provisions of Chapter 1200-3-20 of the Tennessee Air Pollution Control Regulations.

TAPCR 1200-03-09

- E3-11.** Insignificant activities, as stated by the company in the Title V Application per Rule 1200-03-09-.04(5), are listed below. Additional insignificant activities may be added and operated at any time with the provision that a written notification shall be submitted to the Technical Secretary, including an updated APC 2 Application Form along with a Truth, Accuracy, and Completeness Statement signed by a responsible official. The permit may be updated to include additional insignificant sources by means of an Administrative Amendment, if necessary.

Activity	TAPCR Exemption Rule
Parts Washers (2)	1200-03-09-.04(5)(f)(76)
Laboratory Testing	1200-03-09-.04(5)(f)(19)
Plasticizer Tanks	1200-03-09-.04(5)(g)(20)
Water Cooling Tower	1200-03-09-.04(5)(f)(15)
Line 10 Ink Jet Printer	1200-03-09-.04(5)(a)(4)(i)
Dry Blend Mixing System	1200-03-09-.04(5)(a)(4)(i)

TAPCR 1200-03-09-.04(5)(a)4.(i)

- E3-12.** This source shall comply with all applicable state and federal air pollution regulations. This includes, but is not limited to, all applicable provisions of the Tennessee Air Pollution Control Comprehensive Rules and Regulations, federal regulations published under 40 CFR 61 and 40 CFR 63 for sources of hazardous air pollutants, and federal regulations published under 40 CFR 60, New Source Performance Standards.

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

- E3-13.** Sources at this facility shall operate in accordance with the terms of this permit, the information submitted in the approved permit application referenced in **Condition E3-1**, and any documented agreements made with the Technical Secretary.

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

- E3-14.** A. The permittee shall continuously monitor and record (i.e., a minimum of once every fifteen minutes) the RTO combustion chamber temperature using a thermocouple during operation of the RTO. The RTO shall be operated with a minimum combustion chamber temperature of 1558°F averaged over a three-hour block period when an associated coating line is in operation (Line 1, 3, or 11). This requirement is based on the results of the most recent capture efficiency and destruction efficiency testing of the RTO on January 6 and 7, 2010. The first three-hour block period of each day begins at 12:00 midnight and ends at 2:59 am. The second three-hour block period of each day begins at 3:00 am and ends at 5:59 am, and etc.

Compliance Method: Compliance with the above minimum combustion chamber temperature requirement and all permanent total enclosure criteria for Lines 1, 3, and 11 shall assure an overall VOC destruction efficiency of 98.7% as indicated by the results of the most recent performance testing of the RTO on January 6 and 7, 2010. Any deviations from the RTO's minimum combustion chamber temperature requirement (three-hour block data averaging basis) during which the average temperature is more than 50°F below the minimum combustion chamber temperature of 1558°F shall be recorded in a deviation log within seven days of the incident. An explanation of the cause of the incident and the corrective action taken shall be included in the deviation log. The combustion chamber temperature shall be recorded in either electronic or manual format. Manual format records found below, or in an alternative format, which provides the same information shall also include the initials of the person performing the readings, along with the date, time, and any relevant comments. Times that the source is not in operation shall be noted. These records shall be retained in accordance with **Condition E2(d)**.

B. Pursuant to the requirements of the Compliance Assurance Monitoring (CAM) Rule (40 CFR 64), the permittee shall install, calibrate, certify to the Technical Secretary, operate, and maintain continuous monitoring equipment on the Regenerative Thermal Oxidizer (RTO) which shall monitor the combustion chamber temperature at all times when associated coating line(s) are in operation. The monitoring equipment shall meet the following requirements:

1. The continuous temperature monitoring equipment shall be equipped with a continuous recorder and have an accuracy of ± 1 percent (1.8 percent in degrees Fahrenheit) of the combustion temperature being measured expressed in degrees Celsius, or 0.5°C, whichever is greater.
2. The continuous recorder may be any device, which records the combustion temperature at least four times per hour, at equally spaced intervals.
3. The temperature monitor and recorder shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

In the event of any 3-hour block of time, when at least one associated coating line is in operation, during which the average combustion zone temperature in the RTO is more than 28°C (50°F) below the average combustion temperature of 1558°F (the most recent emission test which demonstrated that the source was in compliance) shall be considered an excursion.

Compliance Method: Records of the RTO temperature, required above, shall be recorded in a suitable permanent format (see example below) and kept available for inspection by the Division. These records must be retained for a period of not less than five (5) years. The date each temperature measurement began shall be entered in the log no later than seven (7) days for which the data is required.

The coating lines will not be considered controlled by RTO in the event of temperature excursion. The permittee shall track the excursions for the coating lines controlled by RTO. When the control device is not operating or not meeting the minimum temperature requirements, the destruction efficiency and capture efficiency may not be used to reduce VOC emissions. When a control device is not used, emissions of VOC will be calculated using the VOC content and amount of the material used.

Thermocouple temperature averaging methods shall be the same as the thermocouple average temperature method used during the most recent emission test.

Date/Time	Temperature	3-hour block Temperature	Temperature Excursion (Yes/No)	Coating line Numbers Control by RTO

40 CFR 64.3

E4. Source Specific Permit Requirements for Coating Lines 1 and 2

82-0007-01	Line 1:	PVC Plastisol Vinyl / Fabric Coating with RTO Control: PVC coatings are prepared in mixers. Knife over roll coater applies PVC coating to continuous web of vinyl coated fabric substrate previously coated on Line 2, or to a continuous web of uncoated nylon or polyester fabric substrate. After coating, material enters 8.5 MMBtu/hr natural gas fired oven for curing. Emissions from this operation include volatile organic compounds, products of combustion (insignificant quantities), and PM from the mixing process, which is controlled by a baghouse.
------------	----------------	---

82-0007-01	Line 2:	PVC Primer Fabric Coating with RTO Control: PVC primers are prepared in mixers. Pad roll coater applies primer to continuous web of uncoated nylon or polyester fabric substrate. After coating, material enters a 8.5 MMBtu/hr natural gas fired oven for curing. Emissions from this source include volatile organic compounds, products of combustion (insignificant quantities), and PM from the mixing process, which is controlled by a baghouse.
------------	----------------	---

Conditions E4-1 through E4-3 apply to source 82-0007-01 unless noted otherwise

- E4-1.** The permittee shall not cause or allow the application of any coating or ink, on any vinyl coating line, with VOC content in excess 3.8 pounds per gallon (0.33 lbs/lbs) of coating or ink, excluding water and/or exempt compounds, as applied.

TAPCR 1200-03-18-.16(3)

The permittee shall not cause or allow the application of any coating, on any fabric coating line, with VOC content that exceeds 2.9 pounds per gallon (0.25 lbs/lbs) of coating, excluding water and/or exempt compounds, as applied.

TAPCR 1200-03-18-.15

Compliance Method: Compliance shall be demonstrated by compliance with **Conditions E4-2** and maintaining records of VOC content as noted below. If compliance with this condition can be shown by record keeping, RTO control is optional. As an alternative to compliance with these emission limits, the permittee may route the VOC emissions to the RTO and demonstrate, based on emission testing, that the overall emission reduction efficiency achieved is greater than or equal to the overall emission reduction efficiency required:

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

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

The VOC content of any new coating shall be determined as stated above. The results of all of these determinations for both existing and new coatings for the emission source of concern shall also be compiled in a tabular or spreadsheet format and maintained at the source location. This information shall be retained for a period of at least 5 years and shall be made available for inspection by the Technical Secretary's representative.

* A solvent-based coating is one which contains 5 percent or less water by weight in its volatile fraction.

** A water-based coating is one which contains more than 5 percent water by weight in its volatile fraction.

TAPCR 1200-03-18

- E4-2.** Records shall be kept for the usage of material containing volatile organic compounds and hazardous air pollutants. Emissions of VOC and HAP shall be determined from these records for compliance and fee purposes in the format given in **Condition E3-6**. Additionally records of when the emissions from each line are routed to the RTO shall also be kept for compliance purposes.

TAPCR 1200-03-10

- E4-3.** Particulate matter emissions from the above referenced coating lines and mixers shall not exceed 3.59 pounds per hour on a daily average. For fee purposes actual emissions are assumed to be equal to allowable emissions, unless otherwise demonstrated.

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

Compliance Method: The permittee shall operate and maintain a baghouse to control PM emissions. The source(s) controlled by the baghouse(s) shall not operate unless each control device is installed and operated. The permittee shall monitor the baghouse control devices for this source as follows:

- (a) For baghouse(s) with an exhaust gas flow rating of more than 2,000 actual cubic feet per minute (acfm), the permittee shall:
- (1) Assure continued compliance by maintaining the proposed minimum pressure drop of 0.5 inches of water across each baghouse (unless notified by the Division that an alternate pressure drop must be used) and recording one pressure drop reading per day while the source is in operation; conducting weekly visual inspections of the exterior of the baghouse and the baghouse ductwork, including the baghouse exhaust, and recording the inspections in a log that includes the date and time of the inspection. The log shall be maintained in the format as shown below, or in an alternative format, which readily provides the same information. If the permittee finds that a sub-minimum pressure drop, abrasion hole, emissions problem, or plugging problem has developed during an inspection of the baghouse(s), the permittee shall initiate corrective action within 24 hours and complete corrective action as expeditiously as practical. The permittee shall record all corrective action taken, including the date and time of initiation and completion of all corrective actions, in the log.
 - (2) For lower pressure drop reading(s) resulting from replacement of bags, the permittee shall record the deviation(s) in the log. Due allowance will be made for lower pressure drop reading(s) which follow replacement of bags provided the permittee establishes to the satisfaction of the Technical Secretary that these lower readings resulted from the replacement of bags.
 - (3) In summary, the log shall include the initials of the person performing the pressure drop reading (if manual format is used) and inspection, any corrective action(s)/deviation(s), along with the date, time, and any relevant comments. Days that the source is not in operation shall be noted. These records shall be retained in accordance with **Condition E2(d)**.

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

20__ DAILY COATING LINE MIXER BAGHOUSE READINGS FOR SOURCE 01, BAGHOUSE #2										
JAN <input type="checkbox"/> FEB <input type="checkbox"/> MAR <input type="checkbox"/> APR <input type="checkbox"/> MAY <input type="checkbox"/> JUN <input type="checkbox"/> JUL <input type="checkbox"/> AUG <input type="checkbox"/> SEP <input type="checkbox"/> OCT <input type="checkbox"/> NOV <input type="checkbox"/> DEC <input type="checkbox"/>										
1 st Shift <input type="checkbox"/> Shift Start Time: _____ Shift End Time: _____										
2 nd Shift <input type="checkbox"/> Shift Start Time: _____ Shift End Time: _____										
3 rd Shift <input type="checkbox"/> Shift Start Time: _____ Shift End Time: _____										
Day	Time		Mixer(s) operating?		Baghouse operating?		Pressure Drop (inches of water)	Comments / Corrective Actions	Initials	
	Reading	Inspection	Yes	No	Yes	No			Reading	Inspection
1			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
2			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
3			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
...			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
31			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

E5. Source Specific Permit Requirements for Coating Line 3

82-0007-06	Line 3:	Urethane Primer Fabric Coating with RTO Control: Urethane primers are prepared in mixers. Knife over roll coater applies polyurethane based coatings to continuous web of uncoated nylon or polyester fabric substrates. After coating, material enters steam-heated oven for curing. Emissions from this source are volatile organic compounds, including hazardous air pollutants. This source is subject to NSPS Subpart VVV.
------------	----------------	--

Conditions E5-1 through E5-6 apply to source 82-0007-06 unless noted otherwise
--

- E5-1.** The permittee shall not cause or allow the application of any coating or ink, on any vinyl coating line, with VOC content in excess 3.8 pounds per gallon (0.33 lbs/lbs) of coating or ink, excluding water and/or exempt compounds, as applied.

TAPCR 1200-03-18-.16(3)

The permittee shall not cause or allow the application of any coating, on any fabric coating line, with VOC content that exceeds 2.9 pounds per gallon (0.25 lbs/lbs) of coating, excluding water and/or exempt compounds, as applied.

TAPCR 1200-03-18-.15

Compliance Method: Compliance shall be demonstrated by compliance with **Conditions E5-2** and **Conditions E5-4** and maintaining records of VOC content as noted below.

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

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

The VOC content of any new coating shall be determined as stated above. The results of all of these determinations for both existing and new coatings for the emission source of concern shall also be compiled in a tabular or spreadsheet format and maintained at the source location. This information shall be retained for a period of at least 5 years and shall be made available for inspection by the Technical Secretary's representative.

* A solvent-based coating is one which contains 5 percent or less water by weight in its volatile fraction.

** A water-based coating is one which contains more than 5 percent water by weight in its volatile fraction.

TAPCR 1200-03-18

- E5-2.** Records shall be kept for the usage of material containing volatile organic compounds and hazardous air pollutants. Emissions of VOC and HAP shall be determined from these records for compliance and fee purposes in the format given in **Condition E3-6**. Additionally records of when the emissions from each line are routed to the RTO shall also be kept for compliance purposes.

TAPCR 1200-03-10

NSPS Requirements

- E5-3.** For coating line 3 subject to 40 CFR 60 Subpart VVV, the permittee shall either:

- (1) Reduce VOC emissions to the atmosphere from the coating operation by at least 90 percent ("emission reduction" standard); or
- (2) Install, operate, and maintain a total enclosure around the coating operation and vent the captured VOC emissions from the total enclosure to a control device that is at least 95 percent efficient (alternative standard).

40 CFR 60.742(b)

Compliance Method: A stack test was performed on January 6 and 7, 2010, to determine capture and control efficiency of the RTO from the coating operation by capturing, venting, and measuring all VOC emissions from that coating operations. This stack test demonstrated that this source meets the above requirements. Compliance with this condition shall be demonstrated by compliance with **Conditions E3-10 and E3-14**.

- E5-4.** The permittee shall reduce the VOC emissions to the atmosphere from the coating operation by at least 90 percent (the "emission reduction" method).

40 CFR 60.742(b)

Compliance Method: Compliance with this condition shall be demonstrated by compliance with **Conditions E3-10 and E3-14**.

- E5-5.** The permittee shall install, operate, and maintain a cover on each mixer used to mix coatings for this Coating Line.

40 CFR §60.742(c)(2)

Compliance Method: Compliance with this condition is demonstrated by the following (40 CFR §60.743(d)):

1. Covers shall satisfy the specifications below:
 - a. Cover shall be closed at all times except when adding ingredients, withdrawing samples, transferring the contents, or making visual inspection when such activities cannot be carried out with cover in place. Such activities shall be carried out through ports of the minimum practical size;
 - b. Cover shall extend at least 2 centimeters beyond the outer rim of the opening or shall be attached to the rim;
 - c. Cover shall be of such design and construction that contact is maintained between cover and rim along the entire perimeter;
 - d. Any breach in the cover (such as a slit for insertion of a mixer shaft or port for addition of ingredients) shall be covered consistent with the requirement above when not actively in use. An opening sufficient to allow safe clearance for a mixer shaft is acceptable during those periods when the shaft is in place; and;
 - e. A polyethylene or nonpermanent cover may be used provided it meets the requirements above. Such a cover shall not be reused after once being removed.
2. Procedures detailing the proper use of covers, as specified above, shall be posted in all areas where the affected coating mix preparation equipment is used.

- E5-6.** The permittee shall submit quarterly reports when the following events occur:

1. All 3-hour periods (during actual coating operation) during which the average combustion temperature of the RTO is more than 50°F (28°C) below the average combustion temperature of the RTO during most recent performance test that demonstrated compliance.

2. All periods during actual mixing or coating when a required monitoring device (if any) was malfunctioning or not operating;
3. All periods during actual mixing or coating when the RTO was malfunctioning or not operating;
4. If quarterly reports are not required because no periods specified above have occurred, the permittee shall submit semiannual "statements" clarifying this fact.

Quarterly reports shall be submitted (see address in **Condition E2(c)**), if required, and must be postmarked within 30 days of the end of the reporting period. Semiannual "statements" shall be included in the semiannual report specified in **Condition E2 (a)** of the Title V Permit.

40 CFR 60.747

E6. Source Specific Permit Requirements for Coating Line 11

82-0007-02	Line 11:	Vinyl / Fabric Coating with RTO Control: PVC Coatings are prepared in mixers. Pad roll or knife over roll coating heads coating to a continuous web of uncoated fabric or vinyl coated substrate. After coating material enters an oil heated oven for curing. Oven heat is provided by a 3.5 MMBtu/hr gas fired oil heater. Emissions from this source include volatile organic compounds, products of combustion (insignificant quantities), and PM from the mixing process, which is controlled by a baghouse.
------------	-----------------	---

Conditions E6-1 through E6-4 apply to source 82-0007-02 unless noted otherwise
--

- E6-1.** The permittee shall not cause or allow the application of any coating or ink, on any vinyl coating line, with VOC content in excess 3.8 pounds per gallon (0.33 lbs/lbs) of coating or ink, excluding water and/or exempt compounds, as applied.

TAPCR 1200-03-18-.16(3)

The permittee shall not cause or allow the application of any coating, on any fabric coating line, with VOC content that exceeds 2.9 pounds per gallon (0.25 lbs/lbs) of coating, excluding water and/or exempt compounds, as applied.

TAPCR 1200-03-18-.15

Compliance Method: Compliance shall be demonstrated by compliance with **Conditions E6-2** and maintaining records of VOC content as noted below. If compliance with this condition can be shown by record keeping, RTO control is optional. As an alternative to compliance with these emission limits, the permittee may route the VOC emissions to the RTO and demonstrate that the overall emission reduction efficiency achieved is greater than or equal to the overall emission reduction efficiency required.:

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

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

The VOC content of any new coating shall be determined as stated above. The results of all of these determinations for both existing and new coatings for the emission source of concern shall also be compiled in a tabular or spreadsheet format and maintained at the source location. This information shall be retained for a period of at least 5 years and shall be made available for inspection by the Technical Secretary's representative.

* A solvent-based coating is one which contains 5 percent or less water by weight in its volatile fraction.

** A water-based coating is one which contains more than 5 percent water by weight in its volatile fraction.

TAPCR 1200-03-18

- E6-2.** Records shall be kept for the usage of material containing volatile organic compounds and hazardous air pollutants. Emissions of VOC and HAP shall be determined from these records for compliance and fee purposes in the format given in **Condition**

E3-6. Additionally records of when the emissions from each line are routed to the RTO shall also be kept for compliance purposes.

TAPCR 1200-03-10

NSPS Requirements

E6-3. The maximum input of VOC for Line 11 shall not exceed 94.5 megagrams (104.7 tons) per 12-month period. This source is subject only to the requirements in §§60.744(b), 60.747(b), and 60.747(c) of 40 CFR part 60 subpart VVV. If the amount of VOC used increases to 95 Mg or greater per 12-month period, the facility is subject to all the requirements of this subpart. Once a facility has become subject to the requirements of this subpart, it will remain subject to those requirements regardless of changes in annual VOC use.

E6-4. The permittee shall report the following to the Technical Secretary:

- A. Semiannual estimates of the projected annual amount of VOC to be used for the manufacture of polymeric coated substrate at the affected coating operation in that year; and
- B. Maintain records of actual VOC used.

Semiannual “estimates” shall be included in the semiannual report specified in **Condition E2 (a)** of the title V permit.

40 CFR 60.747

E7. Source Specific Permit Requirements for Coating Line 10

82-0007-13	Line 10:	Dry Blend Vinyl Coating: prepared with hot melt roll coater applying PVC or polyurethane based dry coatings to continuous web of coated fabric substrate previously coated on Lines 2, 3, or 11. A 3.2 MMBtu/hr gas fired oil heater provides roll heating for this coating line. Emissions from this source are volatile organic compounds, including hazardous air pollutants.
------------	-----------------	--

Conditions E7-1 through E7-4 apply to source 82-0007-13

E7-1. The permittee shall not cause or allow the application of any coating or ink, on any vinyl coating line, with VOC content in excess 3.8 pounds per gallon (0.33 lbs/lbs) of coating or ink, excluding water and/or exempt compounds, as applied.

TAPCR 1200-03-18-.16(3)

The permittee shall not cause or allow the application of any coating, on any fabric coating line, with VOC content that exceeds 2.9 pounds per gallon (0.25 lbs/lbs) of coating, excluding water and/or exempt compounds, as applied.

TAPCR 1200-03-18-.15

Compliance Method: Compliance shall be demonstrated by compliance with **Conditions E7-2** and maintaining records of VOC content as noted below.

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

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

The VOC content of any new coating shall be determined as stated above. The results of all of these determinations for both existing and new coatings for the emission source of concern shall also be compiled in a tabular or spreadsheet format and maintained at the source location. This information shall be retained for a period of at least 5 years and shall be made available for inspection by the Technical Secretary’s representative.

* A solvent-based coating is one which contains 5 percent or less water by weight in its volatile fraction.

** A water-based coating is one which contains more than 5 percent water by weight in its volatile fraction.

TAPCR 1200-03-18

- E7-2.** Records shall be kept for the usage of material containing volatile organic compounds. Emissions of VOC and HAP shall be determined from these records for compliance and fee purposes in the format given in **Condition E3-6**. Additionally records of when the emissions from each line are routed to the RTO shall also be kept for compliance purposes.

TAPCR 1200-03-10

NSPS Requirements

- E7-3.** The maximum input of VOC for Line 10 shall not exceed 94.5 megagrams (104.7 tons) per 12-month period. This source is subject only to the requirements in §§60.744(b), 60.747(b), and 60.747(c) of 40 CFR part 60 subpart VVV. If the amount of VOC used increases to 95 Mg or greater per 12-month period, the facility is subject to all the requirements of this subpart. Once a facility has become subject to the requirements of this subpart, it will remain subject to those requirements regardless of changes in annual VOC use.

- E7-4.** The permittee shall report the following to the Technical Secretary:

- A. Semiannual estimates of the projected annual amount of VOC to be used for the manufacture of polymeric coated substrate at the affected coating operation in that year; and
- B. Maintain records of actual VOC used.

Semiannual “estimates” shall be included in the semiannual report specified in **Condition E2 (a)** of the title V permit.

40 CFR 60.747

E8. Source Specific Permit Requirements for the Dry Blend Mixer

82-0007-09	Dry Blend Mixer:	Mixes dry ingredients into dry blend for use on Line 10. Emissions from this source are PM from the mixing process, which is controlled by a baghouse.
------------	-------------------------	--

Condition E8-1 applies to source 82-0007-09

- E8-1.** Particulate matter emitted from this source shall not exceed 4.0 pounds per hour based on a daily average. For Fee purposes, actual emissions are assumed to be equal to allowable emissions, unless otherwise demonstrated.

TAPCR 1200-03-07-.02(4)

Compliance Method: The permittee shall operate and maintain a baghouse to control PM emissions. The source(s) controlled by the baghouse(s) shall not operate unless each control device is installed and operated. The permittee shall monitor the baghouse control devices for this source as follows:

- (a)** For baghouse(s) with an exhaust gas flow rating of more than 2,000 actual cubic feet per minute (acfm), the permittee shall:

- (1) Assure continued compliance by maintaining the proposed minimum pressure drop of 0.5 inches of water across each baghouse (unless notified by the Division that an alternate pressure drop must be used) and recording one pressure drop reading per day while the source is in operation; conducting weekly visual inspections of the exterior of the baghouse and the baghouse ductwork, including the baghouse exhaust, and recording the inspections in a log that includes the date and time of the inspection. The log shall be maintained in the format as shown below, or in an alternative format, which readily provides the same information. If the permittee finds that a sub-minimum pressure drop, abrasion hole, emissions problem, or plugging problem has developed during an inspection of the baghouse(s), the permittee shall initiate corrective action within 24 hours and complete corrective action as expeditiously as practical. The permittee shall record all corrective action taken, including the date and time of initiation and completion of all corrective actions, in the log.

- (2) For lower pressure drop reading(s) resulting from replacement of bags, the permittee shall record the deviation(s) in the log. Due allowance will be made for lower pressure drop reading(s) which follow replacement of bags provided the permittee establishes to the satisfaction of the Technical Secretary that these lower readings resulted from the replacement of bags.
- (3) In summary, the log shall include the initials of the person performing the pressure drop reading (if manual format is used) and inspection, any corrective action(s)/deviation(s), along with the date, time, and any relevant comments. Days that the source is not in operation shall be noted. These records shall be retained in accordance with **Condition E2(d)**.

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

20__ DAILY DRY BLEND MIXER BAGHOUSE READINGS FOR SOURCE 09, BAGHOUSE #1										
JAN□ FEB□ MAR□ APR□ MAY□ JUN□ JUL□ AUG□ SEP□ OCT□ NOV□ DEC□										
1 st Shift <input type="checkbox"/> Shift Start Time: _____ Shift End Time: _____ 2 nd Shift <input type="checkbox"/> Shift Start Time: _____ Shift End Time: _____ 3 rd Shift <input type="checkbox"/> Shift Start Time: _____ Shift End Time: _____										
Day	Time		Mixer(s) operating?		Baghouse operating?		Pressure Drop (inches of water)	Comments / Corrective Actions	Initials	
	Reading	Inspection	Yes	No	Yes	No			Reading	Inspection
1			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
2			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
3			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
...			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
31			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

E9. Source Specific Permit Requirements for the Boiler

82-0007-03	Boiler:	The boiler has a rated heat input capacity of 9.9 MMBtu/hr. It is permitted to burn natural gas. Emissions from this source are the products of combustion.
------------	----------------	---

Conditions E9-1 through E9-6 apply to source 82-0007-03

- E9-1.** Only natural gas shall be used as fuel for the 9.9 MMBtu/hr boiler. Should the permittee need to modify the boiler to allow the use of a fuel other than natural gas, a Title V modification shall first be applied for and received in accordance with 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 capacity and type of fuel used by the boiler. 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. Monthly records of fuel usage shall be included in the semiannual reports according to **Condition E2** and shall be kept at the site location to demonstrate compliance with this condition.

- E9-2.** Particulate matter (PM) emitted shall not exceed 0.074 pounds per hour on a daily average basis.

TAPCR 1200-03-06-.01(7) and the agreement letter dated October 10, 2024, from the permittee. This limit is more stringent than TAPCR 1200-03-06-.02(2).

Compliance Method: Compliance with this emission limitation shall be assured by using the maximum rated design heat input capacity of 9.9 MMBtu/hr for the boiler and the emission factor of 7.6 pounds of particulate matter per one million standard cubic feet of natural gas fired from Table 1.4-2, Emission Factors for Criteria Pollutants and Greenhouse Gases from Natural

Gas Combustion, factor from AP-42, *Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*.

- E9-3.** Sulfur dioxide (SO₂) emitted from this fuel burning unit shall not exceed 0.0058 pounds per hour on a daily average and 0.025 tons during any period of 12-consecutive months.

TAPCR 1200-03-14-.01(3) and the agreement letter dated October 10, 2024, from the permittee. This limit is more stringent than 1200-03-14-.02(2)(a).

Compliance Method: Compliance with this emission limitation shall be assured by using the maximum rated design heat input capacity of 9.9 MMBtu/hr for the boiler and the emission factor of 0.6 pounds of sulfur dioxide per one million standard cubic feet of natural gas fired from Table 1.4-2, Emission Factors for Criteria Pollutants and Greenhouse Gases from Natural Gas Combustion, factors from AP-42, *Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*.

- E9-4.** Nitrogen Oxides (NO_x) emissions from this fuel burning unit shall not exceed 4.25 tons during any period of 12-consecutive months.

TAPCR 1200-03-06-03(2) and the agreement letter dated October 10, 2024, from the permittee.

Compliance Method: Compliance with this emission limitation shall be assured by using the maximum rated design heat input capacity of 9.9 MMBtu/hr for the boiler and the emission factor of 100 pounds of nitrogen oxides per one million standard cubic feet of natural gas fired from Table 1.4-2, Emission Factors for Criteria Pollutants and Greenhouse Gases from Natural Gas Combustion, factors from AP-42, *Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*.

- E9-5.** VOC emissions from this fuel burning unit shall not exceed 0.23 tons during any period of 12-consecutive months.

TAPCR 1200-03-06-03(2) and the agreement letter dated October 10, 2024, from the permittee.

Compliance Method: Compliance with this emission limitation shall be assured by using the maximum rated design heat input capacity of 9.9 MMBtu/hr for the boiler and the emission factor of 5.5 pounds of volatile organic compounds per one million standard cubic feet of natural gas fired from Table 1.4-2, Emission Factors for Criteria Pollutants and Greenhouse Gases from Natural Gas Combustion, factor from AP-42, *Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*.

- E9-6.** Carbon monoxide emissions from this fuel burning unit shall not exceed 3.6 tons during any period of 12-consecutive months.

TAPCR 1200-03-06-03(2) and the agreement letter dated October 10, 2024, from the permittee.

Compliance Method: Compliance with this emission limitation shall be assured by using the maximum rated design heat input capacity of 9.9 MMBtu/hr for the boiler and the emission factor of 84 pounds of carbon monoxide per one million standard cubic feet of natural gas fired from Table 1.4-2, Emission Factors for Criteria Pollutants and Greenhouse Gases from Natural Gas Combustion, factor from AP-42, *Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*.

E10. Source Specific Permit Requirements for the Silos

82-0007-08	PVC Resin Silos:	Two (2) Vertical silos for storage of dry, granular PVC resin. Emissions only occur during filling. Baghouses are used for PM emissions control.
------------	-------------------------	--

Conditions E10-1 through E10-2 apply to source 82-0007-08

E10-1. Particulate matter (PM) emitted from this source shall not exceed 0.25 grains per dry standard cubic foot of exhaust gas (4.73 lb/hr based on maximum flow rate). For fee purposes, actual emissions are assumed to be equal to allowable emissions, unless otherwise demonstrated.

TAPCR 1200-03-07-.04(2)

Compliance Method: The permittee shall operate and maintain a baghouse to control PM emissions. The source shall not operate unless the baghouse is in operation. The permittee shall inspect the baghouse on a semi-annual basis during source operation. The permittee shall initiate, as well as record, corrective action within 24 hours and complete, as well as record, corrective action as expediently as practical if the permittee finds that a problem has developed during an inspection of the baghouse. Inspection records for the baghouses should include: if the source is in operation, if the control device is in operation, if the control device is free of abrasion holes, emissions problems, or plugging problem, and the initials of the person performing the inspection(s) and corrective action(s), along with the date, time, and any relevant comments. Days that the source is not in operation shall be noted. These records shall be retained and reported in accordance with **Condition E2(d)**.

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

E10-2. *Reserved*

END OF DRAFT PERMIT NUMBER: 582095

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, SO₂, NO_x, HCl, HF, HBr, Ammonia, and Methane.

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

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

Reader Error

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

EPA Method 9, NSPS or NESHAPS stipulate opacity standards:

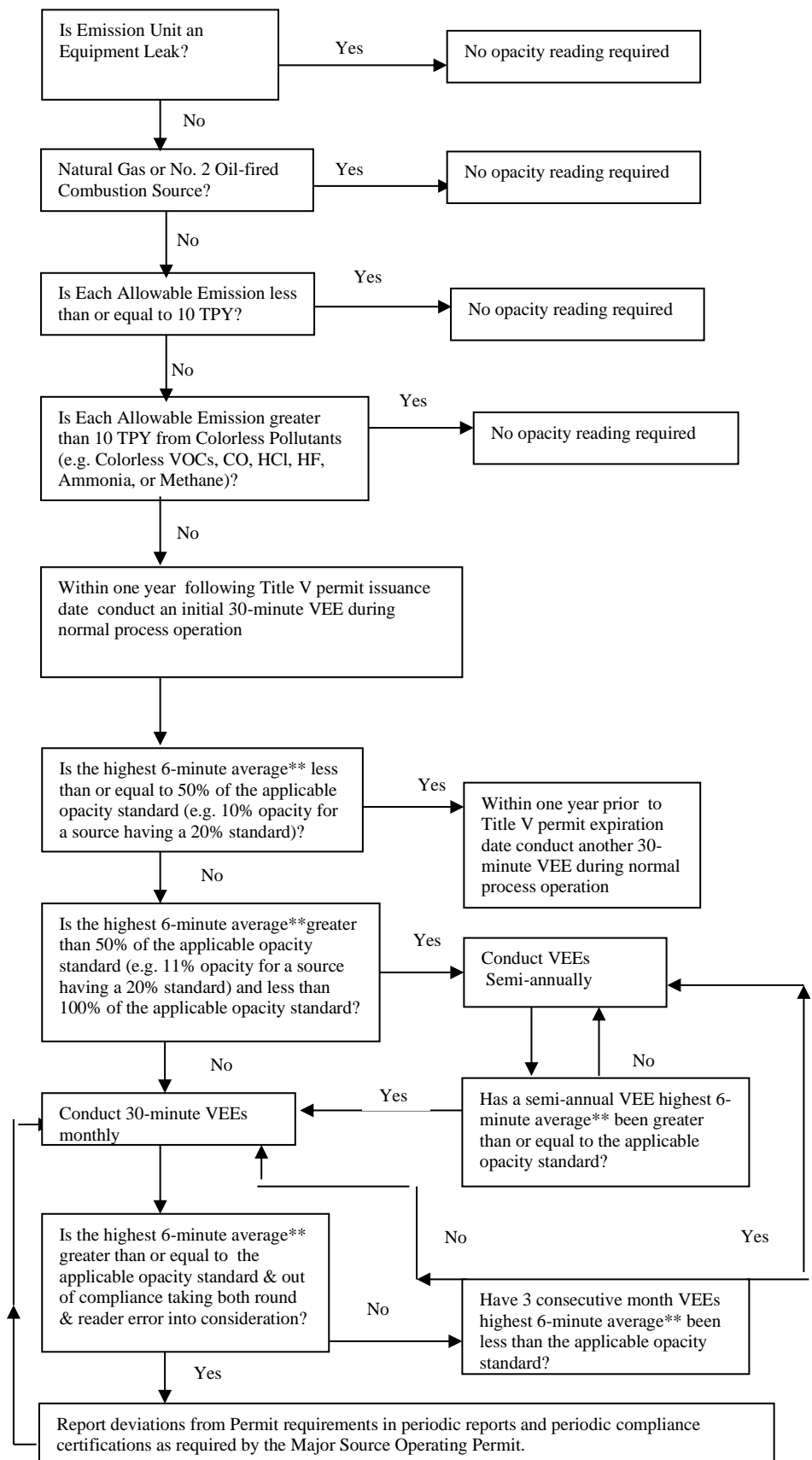
EPA guidance is to allow only engineering round. No allowance for reader error is given.

*Not applicable to Asbestos manufacturing subject to 40 CFR 61.142

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

DATED JUNE 18, 1996

AMENDED SEPTEMBER 11, 2013



ATTACHMENT 2

CHAPTER 18 COMPLIANCE CALCULATIONS

**CALCULATION OF WORST-CASE REQUIRED CONTROL EFFICIENCY ON BRISTOL LINE
3 PER Tenn. Comp. R. & Regs. 1200-3-18-.15**

Parameters set in Title V Permit in 2006 significant modification:

1. Max. VOC Content = 85%
2. Min. Overall Control Efficiency = 90% (required by NSPS, 40 CFR 60 Subpart VVV)

Emissions limit for fabric coating from 1200-3-18-.15 is 2.9 lb VOC/gal coating

Converting to lb VOC/gal solids:

$$S = (2.9 \text{ lb VOC/gal}) / [1 - (2.9 \text{ lb VOC/gal}) / (7.36 \text{ lb VOC/gal VOC})] = 4.79 \text{ lb VOC/gal solids}$$

$$\text{Required Control Efficiency } E = (\text{VOC}_a - S) / \text{VOC}_a \times 100\%$$

Density of urethane adhesive = 7.2 lb/gal

$$\text{Max VOC Content in lb/gal} = (7.2 \text{ lb ctng/gal ctng}) \times (0.85 \text{ lb VOC/lb ctng}) = 6.12 \text{ lb/gal ctng}$$

$$\text{VOC}_a = (6.12 \text{ lb VOC/gal}) / [1 - (6.12 \text{ lb VOC/gal}) / (7.36 \text{ lb VOC/gal VOC})] = 36.3 \text{ lb VOC/gal solids}$$

$$\text{Required Control Efficiency } E = (36.3 - 4.79) / 36.3 \times 100\% = 86.9\%$$

The highest possible control efficiency required by Tenn. Comp. R. & Regs. 1200-3-18-.15 under the conditions of the existing Title V permit is less than the 90% control efficiency required by 40 CFR 60 Subpart VVV.

ATTACHMENT 3

PSD Avoidance/VOC Agreement Letter



Seaman Corporation

Innovative Customer Solutions through Fiber and Polymer Technology

P.O. BOX 3946 • 225 N. INDUSTRIAL DR. • BRISTOL, TENNESSEE 37625
PHONE: (423) 989-5200 • FAX: (423) 989-5215 • www.seamancorp.com

10 April 2024

State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
312 Rosa L. Parks Ave., 15th Floor
Nashville, TN 37243

RE: Permit Agreement Letter
Seaman Corporation
225 N. Industrial Dr., Bristol, TN 37620
Emission Source Ref #: 82-0007

Dear Technical Secretary:

On behalf of Seaman Corporation, we have elected to take a limit on volatile organic compounds (VOC) to stay below the major stationary source thresholds for PSD avoidance (TAPCR 1200-3-09-.01(4)(b)1.ii). The following limitations are agreed upon for the above referenced facility:

- Combined VOC emissions for this facility shall not exceed 244.8 tons during all intervals of 12 consecutive months.

Seaman Corporation shall assure/demonstrate compliance with this limitation by recording monthly the VOC content and quantity of each coating used on each coating line, the resulting VOC emissions (considering applicable RTO capture and control), and calculating the 12-month rolling sum of VOC emissions.

Should you have any questions or require additional information, please contact Andrew Shimko via phone at (330) 202-4470 or via e-mail at ashimko@seamancorp.com.

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

Signature

DAVE DEHLMAN

VICE PRESIDENT-OPERATIONS

Date

4-15-2024

ATTACHMENT 4

9.9 MMBtu/hr Boiler AP-42 Emission Factor Agreement Letter



Seaman Corporation

Innovative Customer Solutions through Fiber and Polymer Technology

P.O. BOX 3946 • 225 N. INDUSTRIAL DR. • BRISTOL, TENNESSEE 37625
PHONE: (423) 989-5200 • www.seamancorp.com

10 October 2024

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

RE: Permit Agreement Letter
Seaman Corporation
225 N. Industrial Dr., Bristol, TN 37620
Emission Source Ref #: 82-0007-03 (Boiler)

Dear Technical Secretary:

On behalf of Seaman Corporation, the following limitations are agreed upon for the above referenced facility:

- **Particulate Matter (PM) emitted from the Boiler shall not exceed 0.074 lb/hr and 0.33 ton/12 consecutive months.**
Compliance Method: Compliance shall be assured by using the maximum rated heat input of the boiler (9.9 MMBtu/hr) and the emission factor of 7.6 lb PM/MMscf from Table 1.4-2 of AP-42, *Compilation of Air Pollutant Emission Factors for Stationary Sources, Fifth Edition*.
- **Sulfur Dioxide (SO₂) emitted from the Boiler shall not exceed 0.0058 lb/hr and 0.025 ton/12 consecutive months.**
Compliance Method: Compliance shall be assured by using the maximum rated heat input of the boiler (9.9 MMBtu/hr) and the emission factor of 0.6 lb PM/MMscf from Table 1.4-2 of AP-42, *Compilation of Air Pollutant Emission Factors for Stationary Sources, Fifth Edition*.
- **Nitrogen Oxides (NO_x) emitted from the Boiler shall not exceed 0.97 lb/hr and 4.25 ton/12 consecutive months.**
Compliance Method: Compliance shall be assured by using the maximum rated heat input of the boiler (9.9 MMBtu/hr) and the emission factor of 100 lb PM/MMscf from Table 1.4-1 of AP-42, *Compilation of Air Pollutant Emission Factors for Stationary Sources, Fifth Edition*.

- **Volatile Organic Compounds (VOC) emitted from the Boiler shall not exceed 0.053 lb/hr and 0.23 ton/12 consecutive months.**
Compliance Method: Compliance shall be assured by using the maximum rated heat input of the boiler (9.9 MMBtu/hr) and the emission factor of 5.5 lb PM/MMscf from Table 1.4-2 of AP-42, *Compilation of Air Pollutant Emission Factors for Stationary Sources, Fifth Edition*.
- **Carbon Monoxide (CO) emitted from the Boiler shall not exceed 0.82 lb/hr and 3.6 ton/12 consecutive months.**
Compliance Method: Compliance shall be assured by using the maximum rated heat input of the boiler (9.9 MMBtu/hr) and the emission factor of 84 lb PM/MMscf from Table 1.4-1 of AP-42, *Compilation of Air Pollutant Emission Factors for Stationary Sources, Fifth Edition*.

Should you have any questions or require additional information, please contact Andrew Shimko via phone at (330) 202-4470 or via e-mail at ashimko@seamancorp.com.

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

Signature 
DAVE DEHLMAN
VICE PRESIDENT-OPERATIONS

Date 10/10/2024

ATTACHMENT 5

APC 36 – Title V Fee Selection Form



DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor, Nashville, TN 37243
Telephone: (615) 532-0554, Email: Air.Pollution.Control@TN.gov

APC 36

TITLE V FEE SELECTION

Type or print and submit to the email address above.			
FACILITY INFORMATION			
1. Organization's legal name and SOS control number [as registered with the TN Secretary of State (SOS)]			
2. Site name (if different from legal name)			
3. Site address (St./Rd./Hwy.)			County name
City			Zip code
4. Emission source reference number		5. Title V permit number	
FEE SELECTION			
This fee selection is effective beginning January 1, _____. When approved, this selection will be effective until a new Fee Selection form is submitted. Fee Selection forms must be submitted on or before December 31 of the annual accounting period.			
6. Payment Schedule (choose one):			
Calendar Year Basis (January 1 – December 31) <input type="checkbox"/>		Fiscal Year Basis (July 1 – June 30) <input type="checkbox"/>	
7. Payment Basis (choose one):			
Actual Emissions Basis <input type="checkbox"/> Allowable Emissions Basis <input type="checkbox"/> Combination of Actual and Allowable Emissions Basis <input type="checkbox"/>			
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.

