

PUBLIC NOTICE

Sonoco Metal Packaging, LLC 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 **Sonoco Metal Packaging, LLC** with a site address of 2719 AJ Bush Drive, Dandridge, TN 37725. They have applied for renewal of their existing major source (Title V) operating permit for a food and aerosol can manufacturing operation (Division identification number: 45-0085 and 579656).

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

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

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

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

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 Mr. J. Dolzen at (615) 393-9934 or by e-mail at Justin.Dolzen@tn.gov.

Interested parties are invited to review these materials and comment. In addition, a public hearing may be requested at which written or oral presentations may be made. To be considered, written comments or requests for a public hearing must be received no later than 4:30 PM on **July 6, 2026**. 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, TN 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.

TITLE V PERMIT STATEMENT

Facility Name: Sonoco Metal Packaging, LLC
City: Dandridge
County: Jefferson

Date Application Received: December 3, 2021
Date Application Deemed Complete: December 3, 2021

Emission Source Reference Number: 45-0085
Permit Number: 579656

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 **Sonoco Metal Packaging, LLC** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

Acronyms

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

I. Identification Information

A. Source Description:

Sonoco Metal Packaging, LLC is a food-and-aerosol-can manufacturing facility. The following sources are included in the facility's Title V Permit:

45-0085-01: Six 3-Piece Food Can Manufacturing Lines

45-0085-03: Two 3-Piece Aerosol Can Manufacturing Lines

45-0085-04: One 2-Piece Aerosol IDA Can Manufacturing Line and One 2-Piece Food Can Manufacturing Line with Regenerative Thermal Oxidizer

1. Attainment or Non-Attainment Area Location

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

2. Facility 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).

B. Regulatory Status

1. PSD/NSR

This facility *is not* a major source under PSD. The facility has requested a limitation on VOC to avoid PSD applicability.

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	No	Yes
PM ₁₀	Yes	no	Yes
SO ₂	Yes	No	Yes
VOC	Yes	Yes	No
NO _x	Yes	No	Yes
CO	Yes	No	Yes
Individual HAP	Yes	No	Yes
Total HAPs	Yes	No	Yes
GHG	Yes	No	Yes

3. 40 CFR Part 63 MACT/GACT Standards

This facility *is not* a major source of HAP emissions. This facility *is not* subject to a final 40 CFR Part 63 MACT/GACT Standard. Also, the facility *has not* become subject to *40 CFR Part 63 Subpart KKKK—National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans*, because it became an area source for HAP with the issuance of Construction Permit 960431P on November 9, 2006; prior to the *40 CFR Part 63 Subpart KKKK* existing affected source compliance date of November 13, 2006. Construction Permit 960431P limited facility-wide emissions of HAP (9.9 tons during all intervals of 12 consecutive months for a single HAP and 24.9 tons during all intervals of 12 consecutive months for all HAPs combined).

4. Program Applicability

Are the following programs applicable to the facility?

PSD (*no*)

NESHAP (*no*)

NSPS (*no*)

II. 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* required to submit an accidental release plan pursuant to Section 112(r) of the CAA and TAPCR 1200-03-32.

D. Greenhouse Gas (GHG) Emissions

This facility is *not* a major source of GHG emissions.

E. Compliance Assurance Monitoring (CAM)

Source 04 is subject to CAM. The permittee's CAM plan is incorporated into the permit by reference.

III. Permit History

A. Title V Operating Permit No. 555920, was issued to this facility on October 3, 2003

B. Construction Permit 960431P, issued on November 9, 2006, limited facility-wide emission limits for VOC (99.0 tons during all intervals of twelve (12) consecutive months) and HAP (9.9 tons during all intervals of twelve (12) consecutive months for a single HAP and 24.9 tons during all intervals of twelve (12) consecutive months for all HAPs combined).

C. Conditional Major Operating Permit No. 459075, issued January 24, 2007, maintained the facility-wide emission limits on VOC (99.0 tons during all intervals of twelve (12) consecutive months) and HAP (9.9 tons during all intervals of twelve (12) consecutive months for a single HAP and 24.9 tons during all intervals of twelve (12) consecutive months for all HAPs combined).

D. Construction Permit 961558P, issued on June 12, 2008, added Source 03, and also maintained facility-wide emission limits for VOC (99.0 tons during all intervals of twelve (12) consecutive months) and HAP (9.9 tons during all intervals of twelve (12) consecutive months for a single HAP and 24.9 tons during all intervals of twelve (12) consecutive months for all HAPs combined). Source 03 started up November 13, 2008.

E. Construction Permit 967648P, issued on October 24, 2013, modified Source 03, added Source 04, increased facility-wide emission limits for VOC (to 249.0 tons during all intervals of twelve (12) consecutive months), and maintained facility-wide emission limits for HAP (9.9 tons during all intervals of twelve (12) consecutive months for a single HAP and 24.9 tons during all intervals of twelve (12) consecutive months for all HAPs combined), and required the facility to re-apply for a

Title V permit. This permit was amended twice. The first amendment changed the name from Ball Metal Food and Household Products Corporation to Ball Metal Food Container, LLC; and the second amendment extended the permit expiration date from October 23, 2014, to October 23, 2015.

F. Title V Operating Permit No. 571236, was applied for on January 4, 2016, and issued June 14, 2017.

G. The first renewal, Title V Operating Permit No. 579656, was issued on **draft**.

Changes incorporated as part of this renewal:

1. The permit shell (Sections A-D) were updated.
2. Conditions E1 and E2 were updated.
3. Previous Conditions E3-2 and E3-3 were combined into a single condition (E3-2). Previous Condition E3-4 was removed as Excess Emissions and Malfunctions are addressed in Conditions B8 and B9. Previous Condition E3-5 was revised. Previous Condition E3-7 was removed as Accidental Release Plans are addressed in Condition A20. Previous Condition E3-8 was incorrect and was removed. Previous Condition E3-9 was removed as applicable federal air pollution regulations are addressed in Conditions D11, D12, and D14. Previous Condition E3-15 was removed. Monthly VOC/HAP emission logs were reformatted. Example logs for previous Condition E3-14 were added. E3 conditions were renumbered as needed.
4. The table in Condition E4-4 was updated to correct an error.
5. Condition E5-1 was updated based on a change in exhaust rate.
6. Condition E6-1 was rendered redundant by changes to Conditions E6-4 and E6-8 and was replaced by a condition which incorporates the facility's CAM plan by reference.
7. Previous Condition E6-3 pertained to a testing requirement which has been fulfilled, and was therefore removed.
8. Condition E6-7 was updated based on a change in exhaust rate.
9. The table in Condition E6-9 was updated to correct an error.
10. An updated agreement letter was added as Attachment 2.
11. The CAM plan for Source 04 was added as Attachment 4.

IV. Public Participation Procedures

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

- A. EPA, Region IV
- B. State of North Carolina - Division of Environmental Management
- C. State of Virginia-Virginia Department of Environmental Quality
- D. Knox County Department of Air Pollution Control
- E. Eastern Band of Cherokee
- F. State of Kentucky - Division for Air Quality

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



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

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

Date Issued: draft

Permit Number:
579656

Date Expires: draft

Issued To:

Sonoco Metal Packaging, LLC

Installation Address:

2719 AJ Bush Drive
Dandridge

Installation Description: Food and Aerosol Can Manufacturing

01: Six 3-Piece Food Can Manufacturing Lines
03: Two 3-Piece Aerosol Can Manufacturing Lines
04: One 2-Piece Aerosol IDA Can Manufacturing Line
and One 2-Piece Food Can Manufacturing line with RTO

Facility ID: 45-0085

Renewal Application Due Date:

Between draft, and draft

Primary SIC: 34

Information Relied Upon:

Renewal Application dated December 3, 2021, and addendum received March 13, 2025
Administrative Amendment Application Dated March 29, 2022

(continued on the next page)

TECHNICAL SECRETARY

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

POST AT INSTALLATION ADDRESS

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ATTACHMENT 1	Title V Fee Selection Form	2 pages
ATTACHMENT 2	Agreement Letters	2 pages
ATTACHMENT 3	Opacity Matrix Decision Tree for Visible Emission Evaluation by EPA Method 9, dated June 18, 1996, and amended September 11, 2013	1 page
ATTACHMENT 4	Compliance Assurance Monitoring (CAM) Plan	1 page

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	US Environmental Protection Agency Via EPA's Compliance and Emissions Data Reporting Interface (CEDRI) on EPA's Central Data Exchange (CDX); or Via email to EPA_R4_CAA_Reports@epa.gov
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TAPCR 1200-03-09-.02(11)(e)3(v)(IV)

B7. Emergency provisions. An emergency constitutes an affirmative defense to an enforcement action brought against this source for noncompliance with a technology-based emission limitation due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

(a) The affirmative defense of the emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

1. An emergency occurred and that the permittee can identify the probable cause(s) of the emergency. "Probable" must be supported by a credible investigation into the incident that seeks to identify the causes and results in an explanation supported by generally accepted engineering or scientific principles.

2. The permitted source was at the time being properly operated. In determining whether or not a source was being properly operated, the Technical Secretary shall examine the source's written standard operating procedures which were in effect at the time of the noncompliance and any other code as detailed below that would be relevant to preventing the noncompliance. Adherence to the source's standard operating procedures will be the test of adequate preventative maintenance, careless operation, improper operation or operator error to the extent that such adherence would prevent noncompliance. The source's failure to follow recognized standards of practice to the extent that adherence to such a standard would have prevented noncompliance will disqualify the source from any claim of an emergency and an affirmative defense.

3. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.

4. The permittee submitted notice of the emergency to the Technical Secretary according to the notification criteria for malfunctions in TAPCR Rule 1200-03-20-.03. For the purposes of this condition, "emergency" shall be substituted for "malfunction(s)" in TAPCR Rule 1200-03-20-.03 to determine the relevant notification threshold. The notice shall include a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding the permittee seeking to establish the occurrence of an emergency has the burden of proof.

(c) The provisions of this condition are in addition to any emergency, malfunction or upset requirement contained in TAPCR Divisions 1200-03 and 0400-30 or other applicable requirement.

TAPCR 1200-03-09-.02(11)(e)7

B8. Excess emissions reporting.

(a) The permittee shall promptly notify the Technical Secretary when any emission source, air pollution control equipment, or related facility breaks down in such a manner to cause the emission of air contaminants in excess of the applicable emission standards contained in 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 20 percent for an aggregate of more than five minutes in any one hour or more than 20 minutes in any 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 (six-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 six-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. Routine 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****45-0085****Facility Description:**

This facility produces 3-piece food cans (six can lines), 3-piece aerosol cans (two can lines), 2-piece aerosol cans (one can line), and 2-piece food cans (one can line).

Conditions E1 through E2 apply to all sources in section E of this permit unless otherwise noted.

E1. Fee Payment**FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 45-0085**

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	41.35	AEAR	Includes all fee emissions.
SO ₂	0.12	AEAR	Includes all fee emissions.
VOC	249.00	AEAR	Includes all fee emissions.
NO _x	28.66	AEAR	Includes all fee emissions.
Facility-Wide Total HAP Limit	24.9	AEAR	
Facility-Wide Individual HAP Limit	9.9	AEAR	
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, 2025**, and ends **June 30, 2026**. The next Annual Accounting Period begins **July 1, 2026**, and ends **June 30, 2027**, unless a request to change the annual accounting period is submitted by the responsible official as required by subparagraph 1200-03-26-.02(9)(b) of the TAPCR and approved by the Technical Secretary. If the permittee wishes to revise their annual accounting period or their annual emission fee basis as allowed by subparagraph 1200-03-26-.02(9)(b) of the TAPCR, the responsible official must submit the request to the Division in writing on or before December 31 of the annual accounting period for which the fee is due. If a change in fee basis from allowable emissions to actual emissions for any pollutant is requested, the request from the responsible official must include the methods that will be used to determine actual emissions. Changes in fee bases must be made using the Title V Fee Selection form, form number APC 36 (CN-1583), included as an attachment 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, and 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
571236	January 1, 2026	draft
579656	draft	June 30, 2026

These semiannual reports shall include:

- (1) Any monitoring and recordkeeping required by **Conditions E3-7, E3-8, E3-9, and E6-8** 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 E3-6** 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)(c)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 **July 1** to **June 30** and shall be submitted within 60 days after the end of each 12-month period. The first annual compliance certification following issuance of this permit shall cover the following permits and reporting periods:

Permit Number	Reporting Period Begins	Reporting Period Ends
571236	July 1, 2025	Draft
579656	Draft	June 30, 2026

These certifications shall be submitted to: TN APCD and EPA

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

US EPA Region IV
Through CEDRI on the EPA's CDX
<https://cdx.epa.gov>
 or
EPA_R4_CAA_Reports@epa.gov

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

- (c) **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 December 3, 2021, and signed by the Responsible Official Rickey Cashen, Plant Manager of the permitted facility. If the designated Responsible Official terminates employment or is assigned different duties and is no longer a Responsible Official for this facility as defined in part 1200-03-09-.02(11)(b)21 of the Tennessee Air Pollution Control Regulations, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Responsible Official and certification of truth and accuracy. All representations, agreement to terms and conditions, and covenants made by the former Responsible Official that were used in the establishment of the permit terms and conditions will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements, and/or covenants.
- (b) The application that was utilized in the preparation of this permit is dated December 3, 2021, and identifies Nicholas Abbot, as the Principal Technical Contact for the permitted facility. Notification was received September 30, 2025, that Keith Lyding, Plant Engineering Manager, is now the Principal Technical Contact. If the identified Principal Technical Contact terminates employment or is assigned different duties and is no longer the Principal Technical Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Principal Technical Contact and certification of truth and accuracy.
- (c) The application that was utilized in the preparation of this permit is dated December 3, 2021, and identifies Nicholas Abbot as the Billing Contact for the permitted facility. Notification was received September 30, 2025, that Tracey Wardroup is now the Billing Contact. If the identified Billing Contact terminates employment or is assigned different duties and is no longer the Billing Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Billing Contact and certification of truth and accuracy.

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

E3-2. The following recordkeeping requirements shall apply to this facility:

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

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

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

E3-3. Records of all repair and maintenance activities required by **Condition D15** 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 30 days following the start of the repair or maintenance activity, and the completion date shall be entered in the log no later than seven days from activity completion.

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

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

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

Compliance Method: Compliance with this opacity limitation shall be demonstrated through utilization of the Division's Opacity Matrix dated June 18, 1996 (amended September 11, 2013), that is enclosed as Attachment 3.

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

E3-5. Insignificant activities identified in the Title V application per TAPCR 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 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 or Emissions Unit	Rule (TAPCR) for Insignificant or Exempt Status
None at this time	N/A

TAPCR 1200-03-09-.04(5)

E3-6. The as-supplied volatile organic compound (VOC) and hazardous air pollutant (HAP) content of all VOC and HAP-containing materials (all coatings, inks, adhesives, thinners, and solvents) to be used by this facility shall be determined from Safety Data Sheets (SDS) or manufacturer or vendor formulation data which explicitly list the VOC and HAP content by weight. If new materials are used, or if material formulation is changed, logs used to calculate emissions of VOC and HAP shall be updated within 30 days from the initial date of usage of the new or altered material.

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

Compliance Method: Purchase orders and/or invoices for all VOC- and HAP-containing materials, along with current SDS, must be maintained and kept available for inspection by the Technical Secretary or a Division representative. The SDS must explicitly list the VOC and HAP content by weight for all VOC- and HAP-containing materials. If SDS are not available with

this information, vendor formulation data containing the required information for those materials must also be maintained. Scanned documents (maintained electronically) may be used to fulfill this requirement.

- E3-7.** The maximum quantity of VOC emitted from this facility, including emissions from combustion sources and insignificant emission units and activities, shall not exceed 249.0 tons during all intervals of 12 consecutive months. This is a major new source review (PSD) avoidance limit.

TAPCR 1200-03-09-.01(4) and the agreement letter dated May 18, 2026 (Attachment 2)

Compliance Method: The permittee shall demonstrate compliance with this VOC limit by calculating the actual quantities of VOC emitted from this facility each month and during all intervals of 12 consecutive months and recording the emissions in a log. The permittee shall maintain the monthly and 12 consecutive month logs in the format provided in **Condition E3-8**, or an alternative format that readily provides the same information. All logs shall be retained as specified in **Condition E3-2**.

- E3-8.** The maximum emissions of any individual HAP and/or combination of HAPs listed in Section 112 of the Federal Clean Air Act emitted from this facility, including emissions from combustion sources and insignificant emission units and activities, shall not exceed 9.9 and 24.9 tons during all intervals of 12 consecutive months, respectively.

TAPCR 1200-03-09-.02(11)(a) and the agreement letter dated May 18, 2026 (Attachment 2)

Compliance Method: The permittee shall demonstrate compliance with these HAP limits by calculating the actual quantities of each individual HAP and total HAP emitted from this facility each month and during all intervals of 12 consecutive months and recording the emissions in a log. The permittee shall maintain the monthly and 12 consecutive month logs in the format below, or an alternative format that readily provides the same information. All logs shall be retained as specified in **Condition E3-2**.

Log E3-8A: Monthly Controlled VOC/HAP Emissions Log for Source 45-0085-04								
Month/Year:								
MATERIAL NAME	USAGE (gallons per month (gpm))	VOC CONTENT (pounds VOC per gallon)	HAP_p CONTENT (pounds HAP_p per gallon)	TOTAL HAP CONTENT (pounds HAP per gallon)	OVERALL REDUCTION EFFICIENCY (%)	VOC EMISSIONS (tons VOC per month)	HAP_p EMISSIONS (tons HAP_p per month)	TOTAL HAP EMISSIONS (tons HAP₁ through HAP_n per month)
Material #1								
Material #2								
Etc...								

Note: p = 1, 2, 3, ... n = the number of different hazardous air pollutants. Add columns as required for the number of different hazardous air pollutants. All HAP names shall be clearly identified, either in the monthly total emissions log, or on a corresponding legend.

Log E3-8A is for the monthly total of VOC and HAP emissions from various material inputs that are routed to the RTO. The VOC and HAP emitted is calculated by multiplying VOC and HAP used by (1-overall reduction efficiency) established by the most recent source test. **An overall reduction efficiency of 0% shall be used for any emissions not captured and routed to the RTO. Those emissions shall be recorded in Log E3-8B.**

Log E3-8B: Monthly Uncontrolled VOC/HAP Emissions Log for Sources 45-0085-01, 03, 04							
Month/Year:							
MATERIAL NAME	USAGE (gpm)	VOC CONTENT (pounds VOC per gallon)	HAP_p CONTENT (pounds HAP_p per gallon)	TOTAL HAP CONTENT (pounds HAP per gallon)	VOC EMISSIONS (tons VOC per month)	HAP_p EMISSIONS (pounds HAP_p per month)	TOTAL HAP EMISSIONS (tons HAP₁ through HAP_n per month)
Source 01							
Material #1							
Material #2							
Etc...							
Source 03							
Material #1							
Material #2							
Etc...							
Source 04							
Material #1							
Material #2							
Etc...							

Log E3-8C: Facility-wide 12 Consecutive Month VOC/HAP Emissions Log						
Month/Year:						
Source	VOC EMISSIONS (tons VOC per month)	(*)VOC EMISSIONS (tons VOC per 12-months)	HAP_p EMISSIONS (tons HAP_p per month)	HAP_p EMISSIONS (tons HAP_p per 12-months)	TOTAL HAP EMISSIONS (tons HAP₁ through HAP_n per month)	TOTAL HAP EMISSIONS (tons HAP₁ through HAP_n per 12-months)
01						
03						
04						
Insignificant activities and combustion sources						
Total						

(*) The Tons per 12 Month value is the sum of the VOC (or HAP) emissions in the 11 months preceding the month just completed plus the VOC (or HAP) emissions in the month just completed.

- E3-9.** The VOC content of any coating applied on a can coating line at this facility shall not exceed the following limits. These limits are expressed in units of mass of VOC (pound, lb.) per volume of coating (gallon, gal), excluding water and/or exempt compounds, as applied.

Coating Type	Limit
Sheet basecoat and sheet over varnish	2.8 lb./gal
Exterior basecoat and over varnish (two-piece can)	2.8 lb./gal
Interior body spray coat	4.2 lb./gal
Two-piece can exterior end coat	4.2 lb./gal
Side seam spray coat	5.5 lb./gal
End sealing compound coat	3.7 lb./gal

Pursuant to TAPCR 1200-03-18-.02(10), multiple lines or operations of a source category which are served by a common control system may be treated as a single line or operation for the purpose of determining compliance with the limits above. In this case, the most stringent standard applicable to any of the lines or operations shall be the applicable standard for the purpose of compliance determination.

TAPCR 1200-03-18-.12(3)(a) and (b), 1200-03-18-.12(4), and 1200-03-18-.12(5)(a) and (b)

Compliance Method: The permittee shall demonstrate compliance with this condition using one or more of the following options. The permittee must specify the option used for each coating line (or emission source).

- (a) The permittee shall use only coatings with a VOC content less than the applicable value listed above. Records for this compliance method shall be retained in Log E3-9A, or a similar format that readily provides the same information.
- (b) The permittee must calculate the daily weighted average mass of VOC/gallon, excluding water and/or exempt compounds, as applied, during each calendar day, and maintain records of this information in Log E3-9B, or a similar format that readily provides the same information.
- (c) The permittee shall utilize a capture system and control device and demonstrate compliance as specified in **Condition E6-7**.
- (d) When complying with option (a) or (b), calculations shall be maintained in a log that contains the following information for all input materials subject to Rule 12 used during each day. These logs must be maintained at the source location and kept available for inspection by the Technical Secretary or a Division representative
 - (1) Daily usage and VOC content (lb/gal) of each coating;
 - (2) Coating type(s) of each coating; and if complying with option (b);
 - (3) Daily weighted average emissions in lb VOC/gallon, excluding water and/or exempt compounds, as applied, for each subject coating line.

Log E3-9A: Compliant Coating Log				
Month/Year: _____				
Coating Name	Coating Type	Line #	Limit (lb/gal)	VOC Content (lb/gal)

Log E3-9B: Weighted Average VOC Content Log			
Date: _____			
Coating Line # _____			
Coating Type – Sheet basecoat and sheet over varnish – Limit 2.8 lb/gallon			
Material	VOC Content (lb/gallon)	Material Usage (gal/day)	VOC Emitted (lb/day)
Coating 1			
Coating 2			
Etc.			
Total		[1]	[2]
Daily Weighted Average VOC lb/gal ([2] / [1])			
Coating Type – Exterior Basecoat and over varnish (two-piece can) – Limit 2.8 lb/gallon			
Material	VOC Content (lb/gallon)	Material Usage (gal/day)	VOC Emitted (lb/day)
Coating 1			
Coating 2			
Etc.			
Total		[3]	[4]
Daily Weighted Average VOC lb/gal ([4] / [3])			
Etc.			

45-0085-01: Six 3-piece food can manufacturing process lines (Can Lines 1, 2, 3, 6, 7, 8): The permittee receives tin-plated sheets of steel which are cut into smaller rectangular sections called body blanks and fed into a body maker. The body maker rolls the body blank into a cylinder and transfers it through welding rolls. With the application of electrical current and pressure to the overlapping edges of the can body, a weld is performed creating the side seam of the can. The welded can body or cylinder is then transferred over a liquid side stripe spray nozzle, where an organic lacquer is applied over the strip of bare metal exposed during the weld. The can body then passes through a natural gas or propane-fired oven where the coating is cured.

Emissions are vented at two stages in the coating process: 1) Coating overspray is removed via an exhaust hood which goes through a triple filter and then vents through a stack to the atmosphere. 2) Oven emissions driven off during the coating process are routed through a second stack and vented to the atmosphere.

Conditions **E4-1** through **E4-4** apply to source 45-0085-01

E4-1. PM emitted from this source shall not exceed 1.0 pound per hour, on a daily average basis.

TAPCR 1200-03-07-.01(5) and the agreement letter dated May 18, 2026 (Attachment 2)

Compliance Method: The permittee shall operate and maintain exhaust filter control for each can line. Each can line shall not operate unless the exhaust filters are in place. The permittee shall perform and record weekly visual inspections of the exhaust filters and replace filter(s) as needed. The permittee shall initiate, as well as record, corrective action within 24 hours and complete, as well as record, corrective action as expeditiously as practical if the permittee finds that a problem has developed during an inspection of the exhaust filter(s). Inspection and filter replacement records shall be kept and shall include the initials of the person performing the inspection(s) and corrective action(s), along with the date, time, and any relevant comments. Weeks that the source is not in operation shall be noted. All logs shall be retained as specified in **Condition E3-2**.

E4-2. The VOC content of any coating on any can coating line included in this source shall not exceed the limits in **Condition E3-9**.

TAPCR 1200-03-18-.12(3)(a)

Compliance Method: Compliance with this condition shall be demonstrated as specified in **Condition E3-9**.

E4-3. VOC and HAP emissions from this source, when combined with VOC and HAP emissions from all other sources at this facility, including insignificant emission units and activities, shall not exceed the facility-wide limits specified in **Conditions E3-7** and **E3-8**.

TAPCR 1200-03-09-.01(4) and 1200-03-09-.02(11)(a)

Compliance Method: Compliance with this condition shall be demonstrated as specified in **Conditions E3-7** and **E3-8**.

E4-4. For fee purposes, the permittee shall assume that each unit described below operated at its design heat input using natural gas or propane, operating 8,760 hours per year and utilizing AP-42 Emission Factors. The potential emissions in the following table are from the products of combustion for each unit and represent the worst-case scenario between natural gas and propane combustion.

Unit Description	Design Heat Input (MMBtu/hr)	Potential Emissions			
		PM (tons/year)	SO ₂ (tons/year)	NO _x (tons/year)	VOC (tons/year)
Line 1 Side Seam Stripe Oven	0.6	0.02	0.002	0.38	0.03
Line 2 Side Seam Stripe Oven	0.6	0.02	0.002	0.38	0.03
Line 3 Side Seam Stripe Oven	0.6	0.02	0.002	0.38	0.03
Line 6 Side Seam Stripe Oven	0.6	0.02	0.002	0.38	0.03
Line 7 Side Seam Stripe Oven	0.6	0.02	0.002	0.38	0.03
Line 8 Side Seam Stripe Oven	0.6	0.02	0.002	0.38	0.03
Total:	3.6	0.12	0.01	2.25	0.17

TAPCR 1200-03-26-.02(2)(d)3

45-0085-03: Two 3-piece aerosol can manufacturing process lines (Aerosol Can Lines 5 and 9): The permittee receives tin-plated sheets of steel which are cut into smaller rectangular sections called body blanks and fed into a bodymaker. The bodymaker rolls the body blank into a cylinder and transfers it through welding rolls. With the application of electrical current and pressure to the overlapping edges of the can body, a weld is performed creating the side seam of the can. The welded can body or cylinder is then transferred over a liquid side stripe spray nozzle, where an organic lacquer is applied over the strip of bare metal exposed during the weld. The can body then passes through a natural gas or propane fired oven where the coating is cured.

Emissions are vented at two stages in the coating process: 1) Coating overspray is removed via an exhaust hood which goes through a triple filter and then vents through a stack to the atmosphere. 2) Oven emissions driven off during the coating process are routed through a second stack and vented to the atmosphere.

Conditions E5-1 through E5-4 apply to source 45-0085-03

E5-1. PM emitted from this source shall not exceed 0.02 grains per dry standard cubic foot (0.81 lb/hr), on a daily average basis.

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

Compliance Method: The permittee shall operate and maintain exhaust filter control for each can line. Each can line shall not operate unless the exhaust filters are in place. The permittee shall perform and record weekly visual inspections of the exhaust filters and replace filter(s) as needed. 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 exhaust filter(s). Inspection and filter replacement records shall be kept and shall include the initials of the person performing the inspection(s) and corrective action(s), along with the date, time, and any relevant comments. Weeks that the source is not in operation shall be noted. All logs shall be retained as specified in **Condition E3-2**.

E5-2. The VOC content of any coating on any can coating line included in this source shall not exceed the limits in **Condition E3-9**.

TAPCR 1200-03-18-.12(3)(a)

Compliance Method: Compliance with this condition shall be demonstrated as specified in **Condition E3-9**.

E5-3. VOC and HAP emissions from this source, when combined with VOC and HAP emissions from all other sources at this facility, including insignificant emission units and activities, shall not exceed the facility-wide limits specified in **Conditions E3-7 and E3-8**.

TAPCR 1200-03-09-.01(4) and 1200-03-09-.02(11)(a)

Compliance Method: Compliance with this condition shall be demonstrated as specified in **Conditions E3-7 and E3-8**.

E5-4. For fee purposes, the permittee shall assume that each unit described below operated at its design heat input using natural gas or propane, operating 8,760 hours per year and utilizing AP-42 Emission Factors. The potential emissions in the following table are from the products of combustion for each unit and represent the worst-case scenario between natural gas and propane combustion.

Unit Description	Design Heat Input (MMBtu/hr)	Potential Emissions			
		PM (tons/year)	SO ₂ (tons/year)	NO _x (tons/year)	VOC (tons/year)
Line 5 Aerosol Stripe Oven	0.6	0.02	0.002	0.38	0.03
Line 9 Aerosol Stripe Oven	3.25	0.11	0.01	2.03	0.16
Total:	3.85	0.13	0.012	2.41	0.19

TAPCR 1200-03-26-.02(2)(d)3

45-0085-04: 2-Piece Aerosol IDA Can Manufacturing Line with Regenerative Thermal Oxidizer (RTO) (Two-piece Can Line G3): The permittee receives steel coils as feed stock. The steel coil is fed through a cupper in which cups are stamped out of the coil. The cups are then transferred to bodymakers where the cups are drawn and ironed into an aerosol can shape and the end of the can is trimmed to a specific length. The formed cans are then sent to a washer in which hot water and mild soap are used to remove any oils remaining on the can from the cupping and forming process. The back end of the washer is a drying oven and a source of emissions from the combustion of natural gas or propane.

From the washer oven, the cans travel to a bottom spray machine to apply basecoat (IDA Bottom Coater Spray) to the dome part of the can. The overspray from this process will be captured through a filter system and then ducted to the RTO for destruction. The cans will travel to an induction oven (IDA Bottom Coater Oven) in which the coating is heat cured on the can. The induction oven is electrically heated; emissions are captured and ducted to the RTO. The cans then travel to a basecoater machine (IDA Base Coater) so roll applied basecoat can be applied to the rest of can. The cans then go through a pin oven (IDA Base Coater Oven) so that the basecoat can be heat cured. The pin oven uses natural gas or propane as fuel; emissions from the products of combustion and the cured basecoat are ducted to the RTO. The cans are basecoated so that a label can be applied by ink later in the process. Note: The bottom coat can also be roll applied instead of spray applied.

After base coating, the can is decorated with inks and an over varnish that protects the ink decoration. There are two decorators (IDA Decorator 1 and 2). A dedicated pin oven is associated with each decorator. The inks and over varnish are heat cured in the pin ovens (IDA Deco Oven 1 and 2). Products of combustion from natural gas or propane and emissions from the cured inks and over varnish are ducted to the RTO. Once the outside of the can is decorated, a coating (IDA Inside Spray) is spray applied to the inside of the can. Note that not every can will be required to have inside spray applied. Overspray from this process is filtered and ducted to the RTO. The cans receive a small ink dot in this operation to identify the specific spray gun that applied the coating to the can. This ink is invisible except under a black light. The coated cans are then heat cured in an internal bake oven (IDA Internal Bake Oven). Products of combustion from natural gas or propane and emissions from the cured inside spray are ducted to the RTO.

2-Piece Food Can Manufacturing Line with RTO (Can Line 307): Steel is received as coil feed stock. The coil is fed to the cupper to be stamped out and formed into cups. The cups are then transferred via conveyor to be fed through bodymakers. Cups are then drawn and ironed into a cylindrical food can shape with a dome profile placed on the bottom. Cylinders are then sent to trimmers to be trimmed to a specific length depending on the can size. The formed cans are then transferred to a wash system where the cans are washed with hot water and a mild detergent to remove any remaining oils on the can from the cupping and bodymaker process. The formed cylinder is then passed under a curtain of "washcoat" that will protect the outside of the can. The "washcoat" application and drip area have a dedicated exhaust. From there the can passes to the back end of the washer into the oven. The oven is a source of emissions from the combustion of natural gas. The stack exhausts to the RTO.

From the washer oven, the cans travel to a machine for flanging and beading. The can then exits to a light tester for quality testing. Cans are then sent to the inside spray machines, and a coating is sprayed into the formed cans. Overspray from this process is filtered and ducted to the RTO. The cans receive a small ink dot in this operation to identify the specific spray machine that applied the coating to the can. The coated cans are then heat cured in an internal bake oven. Products of combustion from natural gas and emissions from the cured inside spray are ducted to the RTO. Finally, cans are then conveyed to one last quality check point. Once they pass through, they will move onto a palletizer and are stored in the warehouse.

Conditions E6-1 through E6-9 apply to source 45-0085-04

- E6-1.** The permittee shall comply with the requirements of 40 CFR Part 64 and the requirements established in the CAM plan for the regenerative thermal oxidizer (RTO) associated with Source 04, which is incorporated into this permit by reference and is included as Attachment 4.

TAPCR 1200-03-09-.03(8) and 40 CFR Part 64

Compliance Method: Compliance with this condition is assured by compliance with **Conditions E6-3, E6-5**, and annual RTO burner inspections. Logs of burner inspections shall be retained as specified in **Condition E3-2**.

- E6-2.** VOC and HAP emissions from this source, when combined with VOC and HAP emissions from all other sources at this facility, including insignificant emission units and activities, shall not exceed the facility-wide limits specified in **Conditions E3-7 and E3-8**.

TAPCR 1200-03-09-.01(4) and 1200-03-09-.02(11)(a)

Compliance Method: Compliance with this condition is assured through the use of an emission capture and control system (RTO). The permittee shall operate and maintain an emission capture and control system (RTO) to control emissions of VOC and HAP from this source. The RTO shall have combustion zone temperature monitoring equipment that is installed, calibrated, operated, and maintained according to the vendor's specifications at all times the RTO is in use. The vendor's specifications shall be maintained at the source location and readily available for inspection by the Technical Secretary or a Division representative. Emissions of VOC and HAP shall be calculated as specified in **Conditions E3-7** and **E3-8**.

- E6-3.** The permittee shall continuously monitor and record (i.e., a minimum of once every 15 minutes) the RTO combustion chamber using a thermocouple when the coating process exhaust is being directed to the RTO. The RTO shall be operated with a minimum combustion chamber temperature of 1,471°F, or the minimum temperature established during the most recently approved performance test, averaged over a 3-hour block period. If the RTO is not operating, or it is operating more than 50°F below the minimum temperature specified in this condition, the control efficiency used in emission calculations shall be zero for the 3-hour block period. This requirement is based on the results of the most recent capture efficiency and destruction efficiency testing of the RTO on November 15-16, 2023. A three-hour block average is the average temperature determined during each three-hour block period. The first three-hour block period 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.

TAPCR 1200-03-18-.03(5)(b)(9)

Compliance Method: Compliance with the above minimum combustion chamber temperature requirement and operation of the capture system as it was operated during the November 2023 performance testing shall assure an overall VOC destruction efficiency of 87.4% (based on a capture efficiency of 88.1% and an RTO destruction efficiency of 99.2%) as indicated by the results of the most recent performance testing of the RTO on November 15-16, 2023. Any periods during which the temperature (three-hour block data averaging basis) of the RTO is more than 50°F below the minimum combustion chamber temperature specified in this condition, or when the RTO is not in operation, shall be recorded in a 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 log. The combustion chamber temperature shall be recorded in either electronic or manual format. Manual format records 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 E3-2**.

- E6-4.** Any deviations from the minimum required temperature (based on a 3-hour data block average) for the RTO shall be reported by sending a copy of the notice to the Technical Secretary at the address listed in **Condition E2(b)** within 30 calendar days following the occurrence with any explanation related to the event. A copy of these notices and proof of delivery shall be maintained at the source location and made readily available for inspection by the Technical Secretary or Division representative as specified in **Condition E3-2**.

TAPCR 1200-03-18-.03(5)(c)

Compliance Method: Compliance with this condition shall be assured by submitting the notice(s) required by this condition within 30 calendar days of any temperature deviation and maintaining a record of these notices along with proof of delivery.

- E6-5.** A maintenance log for the capture system, RTO, and monitoring equipment detailing all routine and non-routine maintenance performed, including dates and duration of any outages, shall be maintained. This log shall be maintained at the source location and made readily available for inspection by the Technical Secretary or a Division representative as specified in **Condition E3-2**.

TAPCR 1200-03-18-.03(5)(b)8

Compliance Method: Compliance with this condition shall be assured based on information available to the Technical Secretary which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

- E6-6.** PM emitted from this source shall not exceed 0.02 grain per dry standard cubic foot (7.28 lb/hr), on a daily average basis.

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

Compliance Method: The permittee shall operate and maintain exhaust filter control for each can line. Each can line shall not operate unless the exhaust filters are in place. The permittee shall perform and record weekly visual inspections of the exhaust filters and replace filter(s) as needed. 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 exhaust filter(s). Inspection and filter replacement records shall be kept and shall include the initials of the person performing the inspection(s) and corrective action(s), along with the date, time, and any relevant comments. Weeks that the source is not in operation shall be noted. All logs shall be retained as specified in **Condition E3-2**.

- E6-7.** The VOC content of each coating used by this source shall not exceed the limits specified in **Condition E3-9**, as applied.

TAPCR 1200-03-18-.02(10), 1200-03-18-.12(3)(a), and 1200-03-18-.12(5)

Compliance Method: The permittee has chosen to assure compliance with the VOC content limits by means of a control device. The permittee shall ensure that:

- (a) A capture system and control device are operated at all times that the line is in operation.
- (b) The control device is equipped with the applicable monitoring equipment specified in TAPCR Chapter 18, and the monitoring equipment is installed, calibrated, operated, and maintained according to the vendor's specifications at all times the control device is in use.

The permittee shall:

- (c) Determine for each day the overall emission reduction efficiency needed to demonstrate compliance. The overall emission reduction needed is the lesser of the value calculated according to the procedure in **Condition E6-8** of this permit or 95 percent; and
- (d) Demonstrate each day that the overall emission reduction efficiency achieved is greater than or equal to the overall emission reduction efficiency required.

- E6-8.** The permittee shall determine the overall emission reduction efficiency of the control system for each day as follows:

$$E = \frac{(VOCa - S)}{(VOCa)} \times 100$$

where:

- $E =$ The required overall emission reduction efficiency of the control system;
- $VOCa =$ 1. The maximum VOC content of the coatings and/or inks, as applied, used each day on the subject line or operation, in units of lb. VOC/gal of solids, as determined by the applicable test methods and procedures specified in TAPCR Chapter 18; or
2. The weighted average VOC content, as applied, of the coatings and/or inks used each day on the subject line or operation, in units of lb. VOC/gal of solids, as determined by the applicable test methods and procedures specified in TAPCR Chapter 18 and the procedure in TAPCR 1200-03-18-.82(3)(d); and
- $S =$ VOC emission limitation in terms of lb. VOC/gal of solids = lb. VOC/gal of solids

TAPCR 1200-03-18-.82(3)(c)

- E6-9.** For fee purposes, the permittee shall assume that each unit described below operated at its design heat input using natural gas or propane, operating 8,760 hours per year, and utilizing AP-42 Emission Factors. The potential emissions in the following table are from the products of combustion for each unit, and represent the worst-case scenario between natural gas and propane combustion.

Unit Description	Design Heat Input (MMBtu/hr.)	Potential Emissions			
		PM (tons/year)	SO2 (tons/year)	NOx (tons/year)	VOC (tons/year)
2-Piece Aerosol IDA Can Manufacturing Line					
Water Heater	3.0	0.10	0.01	1.88	0.14
Washer Oven	2.0	0.07	0.01	1.25	0.10
Basecoat Oven	3.3	0.11	0.01	2.06	0.16
Deco Oven 1	3.3	0.11	0.01	2.06	0.16
Deco Oven 2	3.3	0.11	0.01	2.06	0.16
Internal Bake Oven	5.95	0.20	0.02	3.72	0.29
RTO (shared)	8.0	0.27	0.02	5.01	0.39
2-Piece Food Can Manufacturing Line					
Water Heater	3.0	0.10	0.01	1.88	0.14
Washer Oven	2.0	0.07	0.01	1.25	0.10
IBO Oven	4.5	0.15	0.01	2.82	0.22
Total:	38.35	1.29	0.12	24.00	1.85

TAPCR 1200-03-26-.02(2)(d)3

END OF PERMIT 579656

ATTACHMENT 1

Title V Fee Selection Form APC 36 (CN-1583)



TITLE V FEE SELECTION

Type or print and submit to the email address above.

FACILITY INFORMATION

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

FEE SELECTION

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

6. Payment Schedule (choose one):

Calendar Year Basis (January 1 – December 31) ☐

Fiscal Year Basis (July 1 – June 30) ☐

7. Payment Basis (choose one):

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

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

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

8. (Continued)

[illegible]

CONTACT INFORMATION (BILLING)	
NAME	
ADDRESS	
CITY	
STATE	
ZIP	
PHONE	
FAX	
E-MAIL	
DATE	

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

SIGNATURE BY RESPONSIBLE OFFICIAL

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

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

ATTACHMENT 2

Agreement Letters



May 18, 2026

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

Re: Sonoco Metal Packaging, LLC.
Chestnut Hill Facility
Permit Number: 579656
Agreement Letter - Condition Statements: E3-7, E3-8, and E4-1

Dear Mr. Dolzen,

This letter shall be included with Permit #579656, which serves as the facilities agreement with the following Permit Conditions:

E3-7 Agreement Statement:

Sonoco Metal Packaging, LLC (Sonoco) will continue to agree to a maximum quantity of VOC emitted from this facility, including emissions from combustion sources and insignificant emission units and activities, which shall not exceed 249.0 tons per year during all intervals of 12 consecutive months.

Sonoco will continue to demonstrate compliance with this VOC limit by calculating the actual quantities of VOC emitted from this facility each month and during all intervals of 12 consecutive months and recording the emissions in a log. Sonoco will continue to maintain the monthly and 12 consecutive month logs in the format provided in Condition E3-8; or an alternative format that readily provides the same information. All logs will be retained as specified in Condition E3-2 of Permit.

E3-8 Agreement Statement:

Sonoco Metal Packaging, LLC (Sonoco) will continue to agree to maximum emissions of any HAP and/or combination of HAPs listed in Section 112 of the Federal Clean Air Act emitted from this facility, including emissions from combustion sources and insignificant emission units and activities, which shall not exceed 9.9 and 24.9 tons during all intervals of 12 consecutive months.

Sonoco will continue to demonstrate compliance with these HAP limits by calculating the actual quantities of each individual HAP and total HAP emitted from this facility each month and during all intervals of 12 consecutive months and recording the emissions in a log. Sonoco will continue to maintain the monthly and 12 consecutive month logs in the format provided in Condition E3-8; or an alternative format that readily provides the same information. All logs will be retained as specified in Condition E3-2 of Permit.

E4-1 Agreement Statement:

Sonoco Metal Packaging, LLC (Sonoco) will continue to agree to a limit on particulate matter emissions from Source 45-0085-01 (Six 3-piece food can manufacturing process lines (Can Lines 1,2,3,6,7,8)) of 1.0 pound per hour on a daily average.

To demonstrate compliance, Sonoco will continue to operate and maintain exhaust filter control for each can line. Each can line shall not operate unless the exhaust filters are in place. Sonoco will perform and record weekly visual inspections of the exhaust filters and replace filter(s) as needed. Sonoco will initiate, as well as record, corrective action within 24 hours and complete, as well as record, corrective action as expeditiously as practicable if the permittee finds that problem has developed during an inspection of the exhaust Filter(s). Inspection and filter replacement records shall be kept and shall include the initials of the person performing the inspection(s) and corrective action(s), along with the date, time, and any relevant comments. Any week that the source is not in operation shall be noted. All logs will be retained as specified in Condition E3-2 of Permit.

If you have any question regarding this letter of agreement, please contact Keith Lyding, Plant Engineering Manager at (865) 413-0807, Keith.Lyding@sonoco.com.

Sincerely,



Ricky Cashen
Sonoco Metal Packaging, LLC – Chestnut Hill Facility
Plant Manager

ATTACHMENT 3

OPACITY MATRIX DECISION TREE for VISIBLE EMISSION EVALUATION METHOD 9 Dated June 18, 1996, and Amended 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, NO₂, 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

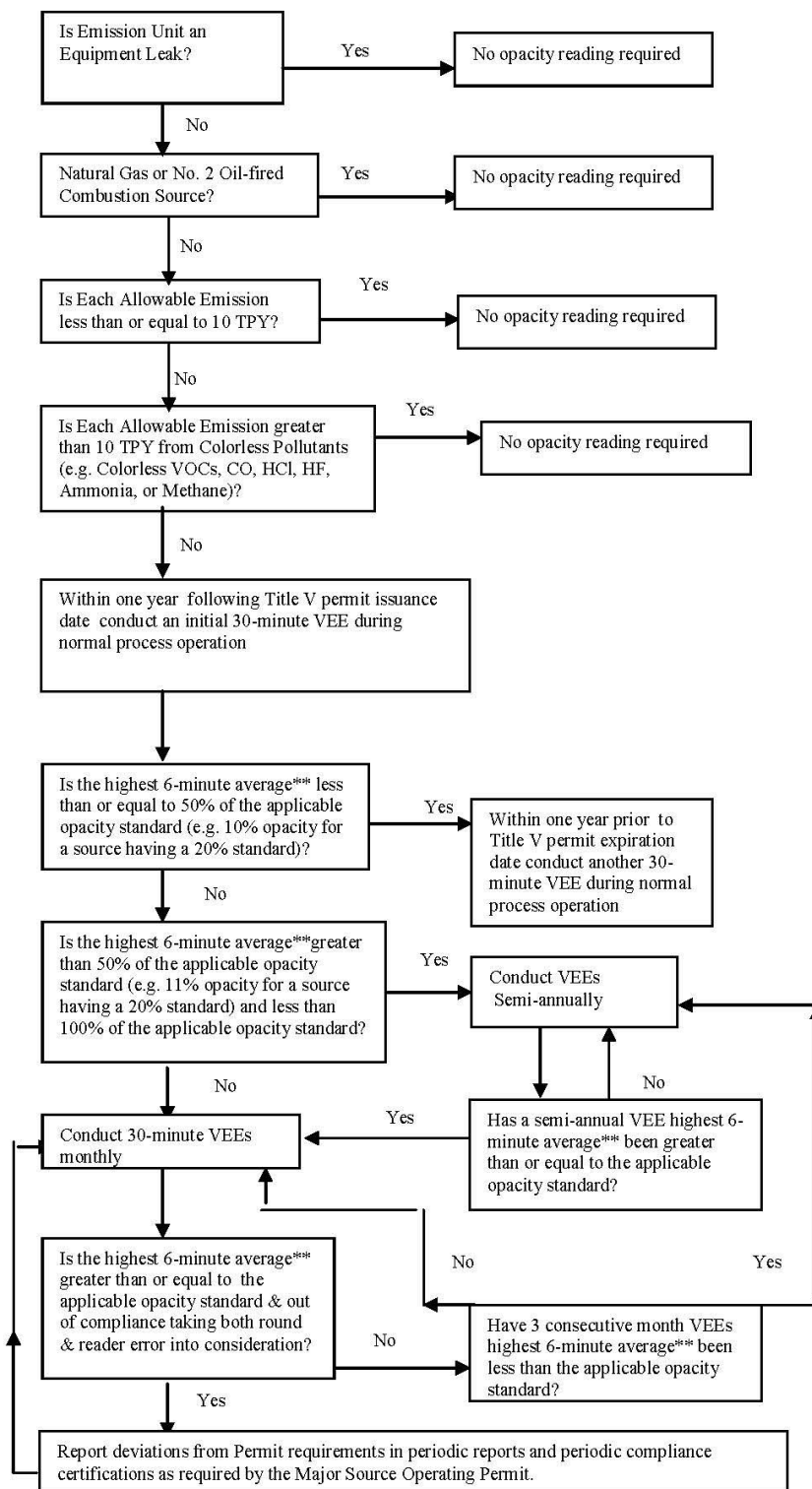
EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards: The TAPCD guidance is to declare non-compliance when the highest six-minute average*** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

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 4

CAM Plan

Regenerative Thermal Oxidizer (RTO) for VOC Control: Chestnut Hill Facility**Table A - Monitoring Approach**

	Indicator No. 1	Indicator No. 2
I. Indicator Measurement Approach	Chamber temperature	Work Practice
	The chamber temperature is monitored with a thermocouple.	Inspection and maintenance of the burner
II. Indicator Range	An excursion is defined as the average 3 hour block temperature readings less than (i.e., $1,549 - 50 = 1,499$)°F or as stated in the most recent stack test.	An excursion is defined as failure to perform annual inspection.
III. Performance Criteria	The sensor is located in the incinerator chamber as an integral part of the incinerator design. The minimum tolerance of the thermocouple is $\pm 4^\circ\text{F}$ or $\pm 0.75\%$ (of temperature measured in degrees Celsius), whichever is greater. The minimum chart recorder sensitivity (minor division) is 20°F .	Not applicable
A. Data Representativeness		
B. Verification of Operational Status	Not applicable	Not applicable
C. QA/QC Practices and Criteria	Accuracy of the thermocouple will be verified by a second, or redundant, thermocouple probe inserted into the incinerator chamber with a handheld meter. This validation check will be conducted at least annually. The acceptance criterion is $\pm 30^\circ\text{F}$.	Not applicable
D. Monitoring Frequency Data Collection Procedure	Temperature measured continuously.	Annual inspection of the burner
	Temperature recorded continuously, documenting data results every 15 minutes.	Record results of annual inspections
Averaging Period	3 hour block.	Not applicable