

PUBLIC NOTICE

Ventek Solutions LLC has applied to the Tennessee Department of Environment and Conservation, Division of Air Pollution Control for renewal of their existing 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 Title V operating renewal permit is identified as follows: Division identification number 60-0184/581131. The applicant is **Ventek Solutions** (Facility ID 60-0184; Division renewal permit no. 581131) with a site address of 1323 North Main Street, Mount Pleasant TN. They have applied for renewal of their existing major source (Title V) operating permit for their foam molding operation.

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

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

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

Tennessee Department of Environment and Conservation
Columbia Environmental Field Office
Division of Air Pollution Control
1421 Hampshire Pike
Suite 100
Columbia, TN 38401

and

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

Also, if you require a copy of the draft/ proposed permit it is available electronically by accessing the TDEC Air Pollution Control Public Participation Opportunity (APC PPO) page:

<http://www.tn.gov/environment/ppo-public-participation/ppo-public-participation/ppo-air.html>

Questions concerning the source may be addressed to Elizabeth Terranova at (865) 323-3891 or by e-mail at Elizabeth.Terranova@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 April 29, 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, Nashville, Tennessee 37243.
2. **E-mail:** Submit electronic comments to air.pollution.control@tn.gov.

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

Individuals with disabilities who wish to review information maintained at the above-mentioned depositories should contact the Tennessee Department of Environment and Conservation to discuss any auxiliary aids or services needed to facilitate such review. Such contact may be in person, by writing, telephone, or other means, and should be made no less than ten days prior to the end of the public comment period to allow time to provide such aid or services. Contact the Tennessee Department of Environment and Conservation ADA Coordinator, Davy Crockett Tower, 6th Floor, 500 James Robertson Parkway, Nashville, TN 37243, 1-(866)-253-5827. Hearing impaired callers may use the Tennessee Relay Service, 1-(800)-848-0298.

STATE OF TENNESSEE
AIR POLLUTION CONTROL BOARD
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, pp. 32295-32312). This permit is issued in accordance with the provisions of paragraph 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations (TAPCR). The permittee has been granted permission to operate an air contaminant source in accordance with emission limitations, monitoring requirements set forth herein.

Date Issued: TBD

Permit Number: 581131

Date Expires: TBD

Issued To:
Ventek Solutions LLC

Installation Address:
1323 North Main Street
Mt. Pleasant

Installation Description: Custom-shape, expandable foam products manufacturing

ESRN	Description
60-0184-01	Fuel Burning Installation: Two Natural Gas-Fired Steam Boilers (25.1 MMBtu/hr and 20.4 MMBtu/hr).
60-0184-02	Expandable Polystyrene Foam Products Manufacturing

Facility ID No.: 60-0184

Renewal Application Due Date:
Between TBD and TBD

Primary SIC: 30

Information Relied Upon:

Administrative Amendment #1 letter dated April 29, 2024, and application dated June 3, 2024
Title V Renewal Application dated February 10, 2023

TECHNICAL SECRETARY

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

POST AT INSTALLATION ADDRESS

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END OF TITLE V PERMIT 581131

ATTACHMENT 1	Opacity Matrix Decision Tree for Visible Emission Evaluation Method 9, dated June 18, 1996 (amended September 11, 2013)
ATTACHMENT 2	Example Log
ATTACHMENT 3	Agreement Letter dated March 25, 2026
ATTACHMENT 4	Title V Fee Selection Form APC 36 (CN-1583)

SECTION A

GENERAL PERMIT CONDITIONS

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

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

TAPCR 1200-03 and 0400-30

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

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

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

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

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

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

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

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

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

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

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

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

- A8. **Fee payment.**

- (a) The permittee shall pay an annual Title V fee in accordance with TAPCR 1200-03-26-.02(9) based upon the applicable base fee; the applicable permit modification fee(s); the responsible official's choice of actual emissions, allowable emissions, or a combination of actual and allowable emissions; and on the responsible official's choice of annual accounting period. An emission cap of 4,000 tons per year per regulated pollutant per major source SIC Code shall apply to actual or allowable based emission fees. A Title V annual emission fee will not be charged for emissions in excess of the cap. Title V annual emission fees will not be charged for carbon monoxide or for greenhouse gas pollutants solely because they are greenhouse gases.
- (b) Title V sources shall pay allowable based emission fees until the beginning of the next annual accounting period following receipt of their initial Title V operating permit. At that time, the permittee shall begin paying their Title V fee based upon the applicable base fee; the applicable permit modification fee(s); and their choice of actual or allowable based fees, or mixed actual and allowable based fees. Once permitted, the Responsible Official may revise their existing fee choice by submitting a written request to the Division no later than December 31 of the annual accounting period for which the fee is due.
- (c) When paying annual Title V emission fees, the permittee shall comply with all provisions of TAPCR Rule 1200-03-26-.02 and paragraph 1200-03-09-.02(11) applicable to such fees.
- (d) Where more than one allowable emission limit is applicable to a regulated pollutant, the allowable emissions for the regulated pollutants shall not be double counted. Major sources subject to the provisions of TAPCR paragraph 1200-03-26-.02(9) shall apportion their emissions as follows to ensure that their fees are not double counted.
1. Emissions of hazardous air pollutants (HAP) that are included in the particulate matter (including PM₁₀) category or the volatile organic compound category shall be included in those categories.
 2. HAP that are not included in either the particulate matter category or volatile organic compound category shall be included in the category of Hazardous Air Pollutants Not Included Above.
 3. Each individual HAP is subject to the 4,000 ton cap provisions of TAPCR subparagraph 1200-03-26-.02(2)(i).
 4. Major sources that wish to pay annual emission fees for PM₁₀ on an allowable emission basis may do so if they have a specific PM₁₀ allowable emission standard. If a major source has a total particulate emission standard, but wishes to pay annual emission fees on an actual PM₁₀ emission basis, it may do so if the PM₁₀ actual emission levels are proven to the satisfaction of the Technical Secretary. The method to demonstrate the actual PM₁₀ emission levels must be made as part of the source's major source operating permit in advance in order to exercise this option. The PM₁₀ emissions reported under these options shall not be subject to fees under the family of particulate emissions. The 4,000 ton cap provisions of TAPCR subparagraph 1200-03-26-.02(2)(i) shall also apply to PM₁₀ emissions.
- (e) Emissions of pollutants that do not fall in one of the listed categories shall be included in the category of Miscellaneous Pollutants Not Listed Above. Each miscellaneous pollutant is subject to the 4,000-ton cap provisions.

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

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

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

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

- (a) Enter upon, at reasonable times, the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) As authorized by the Clean Air Act and Chapter 1200-03-10 of the TAPCR, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
- (e) "Reasonable times" shall be considered to be customary business hours unless reasonable cause exists to suspect noncompliance with the Act, TAPCR Division 1200-03 or any permit issued pursuant thereto and the Technical Secretary specifically authorizes an inspector to inspect a facility at any other time.

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

A11. Permit shield.

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

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

A12. Permit renewal and expiration.

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

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

A13. Reopening for cause.

- (a) A permit shall be reopened and revised prior to the expiration of the permit under any of the circumstances listed below:
 - 1. Additional applicable requirements under the Federal Act become applicable to the sources contained in this permit provided the permit has a remaining term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the permit expiration date of this permit, unless the original has been extended pursuant to TAPCR part 1200-03-09-.02(11)(a)2.
 - 2. Additional requirements become applicable to an affected source under the acid rain program.
 - 3. The Technical Secretary or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - 4. The Technical Secretary or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (b) Proceedings to reopen and issue a permit shall follow the same proceedings as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists, and not the entire permit. Such reopening shall be made as expeditiously as practicable.
- (c) Reopenings for cause shall not be initiated before a notice of such intent is provided to the permittee by the Technical Secretary at least 30 days in advance of the date that the permit is to be reopened except that the Technical Secretary may provide a shorter time period in the case of an emergency. An emergency shall be established by the criteria of T.C.A. 68-201-109 or other compelling reasons that public welfare is being adversely affected by the operation of a source that is in compliance with its permit requirements.
- (d) If the Administrator finds that cause exists to terminate, modify, or revoke and reissue a permit as identified in A13, he is required under federal rules to notify the Technical Secretary and the permittee of such findings in writing. Upon receipt of such notification, the Technical Secretary shall investigate the matter in order to determine if he agrees or disagrees with the Administrator's findings. If he agrees with the Administrator's findings, the Technical Secretary shall conduct the reopening in the following manner:
 - 1. The Technical Secretary shall, within 90 days after receipt of such notification, forward to EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate. If the Administrator grants additional time to secure permit applications or additional information from the permittee, the Technical Secretary shall have the additional time period added to the standard 90-day time period.
 - 2. EPA will evaluate the Technical Secretary's proposed revisions and respond as to their evaluation.

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

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

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

- (a) Transfer of ownership permit application is filed consistent with the provisions of TAPCR paragraph 1200-03-09-.03(6), and
- (b) written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Technical Secretary.

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

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

A16. Construction permit required. Except as exempted in TAPCR Rule 1200-03-09-.04, or excluded in TAPCR subparagraph 1200-03-02-.01(1)(aa) or TAPCR subparagraph 1200-03-02-.01(1)(cc), this facility shall not begin the construction of a new air contaminant source or the modification of an air contaminant source which may result in the discharge of air contaminants without first having applied for and received from the Technical Secretary a construction permit for the construction or modification of such air contaminant source.

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

A17. Notification of changes. The permittee shall notify the Technical Secretary 30 days prior to commencement of any of the following changes to an air contaminant source which would not be a modification requiring a construction permit.

- (a) change in air pollution control equipment
- (b) change in stack height or diameter
- (c) change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

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

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

TAPCR 1200-03-09-.02(11)(d)3, 1200-03-09-.03(8), 0400-30-38, 0400-30-39, and 40 CFR Part 70.5(c)

A19. Title VI.

- (a) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - 1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to Section 82.156.
 - 2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to Section 82.158.
 - 3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to Section 82.161.
- (b) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.
- (c) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR, Part 82, Subpart G, Significant New Alternatives Policy Program.

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

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

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

SECTION B

GENERAL CONDITIONS for MONITORING, REPORTING, and ENFORCEMENT

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

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

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

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

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

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

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

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

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

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

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

- (a) The identification of each term or condition of the permit that is the basis of the certification;
- (b) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any

other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;

- (c) The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in B5(b) above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion* or exceedance** as defined below occurred; and
- (d) Such other facts as the Technical Secretary may require to determine the compliance status of the source.
 * "Excursion" shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.
 ** "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

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

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

The Tennessee Department of Environment and Conservation Environmental Field Office specified in Section E of this permit	and	Air Enforcement Branch US EPA Region IV 61 Forsyth Street, SW Atlanta, Georgia 30303
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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 twenty (20) percent for an aggregate of more than five (5) minutes in any one (1)hour or more than 20 minutes in any twenty-four (24) hour period; provided, however, that for fuel burning installations with fuel burning equipment of input capacity greater than 600 million btu per hour, the permittee shall not cause, suffer, allow, or permit discharge of a visible emission from any fuel burning installation with an opacity in excess of 20 percent (6-minute average) except for one six minute period per one hour of not more than 40 percent opacity. Sources constructed or modified after July 7, 1992, shall utilize 6-minute averaging.
- (b) Consistent with the requirements of TAPCR Chapter 1200-03-20, due allowance may be made for visible emissions in excess of that permitted under TAPCR Chapter 1200-03-05 which are necessary or unavoidable due to routine startup and shutdown conditions. The facility shall maintain a continuous, current log of all excess visible emissions showing the time at which such conditions began and ended and that such record shall be available to the Technical Secretary or an authorized representative upon request.

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

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

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

- D3. Non-process emission standards.** The permittee shall not cause, suffer, allow, or permit particulate emissions from non-process sources in excess of the standards in TAPCR Chapter 1200-03-06.

- D4. General provisions and applicability for process gaseous emissions.** Any person constructing or otherwise establishing an air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize equipment and technology which is deemed reasonable and proper by the Technical Secretary.

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

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

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

D7. Fugitive Dust.

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

1. Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
 2. Application of asphalt, water, or suitable chemicals on dirt roads, material stockpiles, and other surfaces which can create airborne dusts;
 3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.
- (b) The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five (5) minutes per hour or 20 minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in TAPCR Chapter 1200-03-20.

TAPCR 1200-03-08

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

TAPCR 1200-03-04

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

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

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

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

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

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

- D14. Internal Combustion Engines.**

- (a) All stationary reciprocating internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR Rule 0400-30-38-.01.
- (b) All stationary compression ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR Chapter 0400-30-39.
- (c) All stationary spark ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR Chapter 0400-30-39.

TAPCR 0400-30-38 and 39

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

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

SECTION E

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

60-0184	Facility Description:	Foam molding facility in which expandable polystyrene (EPS) and/or polystyrene co-polymer (ARCEL, etc.) beads are expanded and molded into custom shapes for packaging, materials handling, and structural component uses.
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E1. Fee payment

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 60-0184

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	2.02	AEAR	Includes all fee emissions.
SO₂	0.20	AEAR	Includes all fee emissions.
VOC	247.10	AEAR	Includes all fee emissions.
NO_x	13.60	AEAR	Includes all fee emissions.
Facility-Wide Total HAP Limit		AEAR	Included in VOC emissions for fee purposes.
Facility-Wide Individual HAP Limit		AEAR	Included in VOC emissions for fee purposes.
MISCELLANEOUS POLLUTANTS NOT LISTED ABOVE**			
EACH MISC POLLUTANT NOT LISTED ABOVE			N/A

NOTES

AAP The Annual Accounting Period (AAP) is a 12 consecutive month period that either (a) begins each July 1st and ends June 30th of the following year when fees are paid on a fiscal year basis, or (b) begins January 1st and ends December 31st of the same year when paying on a calendar year basis. The Annual Accounting Period at the time of permit renewal issuance began **January 1, 2026, and ends December 31, 2026**. The next Annual Accounting Period begins **January 1, 2027, and ends December 31, 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) and approved by the Technical Secretary. If the permittee wishes to revise their annual accounting period or their annual emission fee basis as allowed by subparagraph 1200-03-26-.02(9)(b), the responsible official must submit the request to the Division in writing on or before December 31 of the annual accounting period for which the fee is due. If a change in fee basis from allowable emissions to actual emissions for any pollutant is requested, the request from the responsible official must include the methods that will be used to determine actual emissions. **Changes in fee bases must be made using the Title V Fee Selection form (Attachment 4), form number APC 36 (CN-1583), included as an attachment to this permit and available on the Division of Air Pollution Control’s website.**

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

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

- (1) **each regulated pollutant** (Particulate matter [PM], SO₂, VOC, NO_x and so forth. See TAPCR 1200-03-26-.02(2)(i) for the definition of a regulated pollutant.),
- (2) the **“HAP Not Included Above” Category (non-VOC and non-PM HAP not included in a facility-wide limit)**, and
- (3) the **Miscellaneous Category**

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

- * **Hazardous Air Pollutants Not Included Above:** This category is made up of hazardous air pollutants that are not included in the VOC or PM category, such as HCl and HF, and are not included in a facility-wide HAP emission limitation. **For fee computation,** each individual hazardous air pollutant is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.
- ** **Miscellaneous Pollutants Not Listed Above:** This category is for pollutants that are not included in one of the other categories but for which an emission limitation has been established in this permit (including NSPS pollutants). **For fee computation,** each pollutant in this category is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

END NOTES

- The permittee shall:**
- (1) Pay Title V **annual fees** (including the emissions fee, base fee, significant modification fee, & minor modification fee), on the emissions and year bases requested by the responsible official and approved by the Technical Secretary, for each annual accounting period (AAP) by the payment deadline(s) established in TAPCR 1200-03-26-.02(9)(a). Fees may be paid on an **actual, allowable, or mixed** emissions basis, and on either a **state fiscal year** or a **calendar year**, provided the requirements of TAPCR 1200-03-26-.02(9)(b) are met. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within 15 days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8).
 - (2) Sources paying annual fees on an allowable emissions basis: pay annual fees for each AAP no later than April 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d). TAPCR 1200-03-26-.02(9)(a)2(i)
 - (3) Sources paying annual fees on a calendar year basis and an actual or mixed emissions basis: pay annual allowable based emission fees for each AAP no later than April 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d), except as allowed by TAPCR 1200-03-26-.02(9)(g)3. TAPCR 1200-03-26-.02(9)(a)2(ii)
 - (4) Sources paying annual fees on a fiscal year basis and an actual or mixed emissions basis: for each AAP, pay an estimated 65% of the fee due no later than April 1 of the current fiscal year. The remainder of the fee for each annual accounting period is due no later than August 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d), except as allowed by TAPCR 1200-03-26-.02(9)(g)3. TAPCR 1200-03-26-.02(9)(a)2(iii)
 - (5) Sources paying annual fees on an actual emissions basis: prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
 - (a) the completed **Fee Emissions Summary Table**,
 - (b) each **actual emissions analysis** required, and
 - (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. The summary must include sufficient information for the Technical Secretary to determine the accuracy of the calculations. These calculations must be based on the Fee Year basis approved by the Technical Secretary (a state fiscal year [July 1 through June 30] or a calendar year [January 1 through December 31]). These records shall be used to complete the **actual**

emissions analyses required by the above **Fee Emissions Summary Table**.

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

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

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

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

- (7) When paying on an actual or mixed emissions basis, submit the **actual emissions analyses** at the time the fees are paid in full or earlier.
- TAPCR 1200-03-26-.02(9)(g)2
- (8) Include with each required AEAR report the following statement signed by the Responsible Official: *"I have reviewed this document in its entirety, and to the best of my knowledge, based on information and belief formed after reasonable inquiry, the statements and information contained in this document are true, accurate, and complete."*

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

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

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

The Tennessee Department of Environment and Conservation and
 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 for this permit shall cover the six-month period from July 1 through December 31 and January 1 through June 30 of the following year and shall be submitted within 60 days after the end of each six-month period. Subsequent reports shall be submitted within 60 days after the end of each six-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
572705	January 1, 2026	day before new permit issuance (with year)
581131	Issuance Date of new permit (with year)	June 30, 2026

These semiannual reports shall include:

- (1) Any monitoring and recordkeeping required by **Conditions E3-5 and E3-6** 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 E3-4** of this permit if required. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (3) Identification of all instances of deviations from **ALL PERMIT REQUIREMENTS**. The record of deviations/excursions shall include, at a minimum, the time the deviation/excursion was discovered, the corrective action taken, and the time that the deviation/excursion was rectified.

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

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

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

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

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

** “Exceedance” shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or

less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

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

Permit Number	Reporting Period Begins	Reporting Period Ends
572705	January 1, 2026	day before new permit issuance (with year)
581131	Issuance Date of new permit (with year)	December 31, 2026

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

**Division of Air Pollution Control
Columbia Environmental Field Office
1421 Hampshire Park
Columbia, Tennessee 38401**
or
APC.ColuEFO@tn.gov

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

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

(c) 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 Division representative.

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

E3. General permit conditions.

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

a) The application that was utilized in the preparation of this permit is dated February 10, 2023, and signed by Responsible Official Jason Helton, Automotive Segment Manager of the permitted facility. Notification was supplied to the Division in the application dated June 3, 2024, that Jason Robinson, Manufacturing Manager, is now the Responsible Official for 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) Notification was supplied to the Division in the application dated June 3, 2024, and was signed by Jason Robinson, Manufacturing Manager, that David Porter, Director of Engineering, would serve as the Principal Technical Contact for the permitted facility. 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) Notification was supplied to the Division in the application dated June 3, 2024, and was signed by Jason Robinson, Manufacturing Manager, that Eric Segner would serve as the Billing Contact for the permitted facility. 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

- E3-2.** The as-supplied VOC and HAP content of all VOC and HAP-containing materials (all coatings, inks, adhesives, thinners, and solvents) to be used by this source shall be determined from Safety Data Sheets (SDS) or manufacturer or vendor formulation data which explicitly list the VOC and HAP content by weight. If new materials are used, or if material formulation is changed, logs used to calculate emissions of VOC and HAP shall be updated within 30 days from the initial date of usage of the new or altered material.

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

Compliance Method: Purchase orders and/or invoices for all VOC- and HAP-containing materials, along with current SDS, must be maintained and kept available for inspection by the Technical Secretary or a Division representative. The SDS must explicitly list the VOC and HAP content by weight for all VOC- and HAP-containing materials. If SDS are not available with this information, vendor formulation data containing the required information for those materials must also be maintained. These records must be retained in accordance with **Condition E2(c)**. Scanned documents (maintained electronically) may be used to fulfill this requirement.

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

E3-3. General Recordkeeping Requirements

- (a) All recordkeeping requirements for all data required to be recorded shall follow the following schedules:

For Daily Recordkeeping	For Weekly Recordkeeping	For Monthly Recordkeeping
No later than seven days from the end of the day for which the data is required.	No later than seven days from the end of the week for which the data is required.	No later than 30 days from the end of the month for which the data is required.

- (b) The information contained in logs, records, and submittals required by this permit shall be kept at the facility’s address, unless otherwise noted, and provided to the Technical Secretary or a Division representative upon request. Computer-generated logs are acceptable. Compliance is assured by retaining the logs, records, and submittals specified in this permit for a period of not less than five years at the facility’s address. Logs and records are not required to be submitted semiannually unless specified in **Condition E2(a)(1)**.

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

- E3-4.** Visible emissions from the sources at 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 from this source 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 TAPCR 1200-03-05-.01(1)

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

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

E3-5. The Hazardous Air Pollutant (HAP) emissions from this facility, including emissions from exempt and insignificant emission units, shall not exceed the following: 9.9 tons during any period of 12-consecutive months of any individual Hazardous Air Pollutant (HAP), and 24.9 tons during any period of 12-consecutive months, of any combination of HAPs.

TAPCR 1200-03-07-.07(2) and the agreement letter dated March 25, 2026. (**Attachment 3**)

Compliance Method: The permittee shall calculate actual emissions of HAPs emitted during each calendar month and each period of 12-consecutive months and maintain records of the emissions in the log, in the format in **Attachment 2**, or in an alternative format, which readily provides the same information. These logs must be maintained at the source location and kept available for inspection by the Technical Secretary or an appointed representative. These logs must also be reported in accordance with **Condition E2** of this permit and be retained in accordance with **Condition E2(c)**.

E3-6. Volatile organic compounds (VOCs) emitted from this facility, including emissions from exempt and insignificant emission units, shall not exceed 247.1 tons during any period of 12-consecutive months. This limit was taken to avoid PSD (Prevention of Significant Air Quality Deterioration).

TAPCR 1200-03-07-.07(2), TAPCR 1200-03-09-.01(4) and the agreement letter dated March 25, 2026. (**Attachment 3**)

Compliance Method: The permittee shall calculate the actual quantities of VOCs emitted during each calendar month and each period of 12-consecutive months and maintain records of the emissions in the table below. At the time of permit issuance potential emissions from Source 01, and exempt and insignificant emission units have been calculated to be 247.1 tons per month in total. In lieu of calculating actual emissions from these sources this value should be added to the VOC total for each 12-consecutive month period. These logs must be maintained at the source location and kept available for inspection by the Technical Secretary or an appointed representative. These logs must also be reported in accordance with **Condition E2** of this permit and be retained in accordance with **Condition E2(c)**.

MONTHLY EMISSIONS LOG FOR SOURCE 60-0184-02 Year: _____

Month	Tons of VOC impregnated beads used per month	Percent of VOC by weight	Emission Fraction Rate of VOC	Tons of VOC emitted per month by Source 02
January			100%	
February			100%	
March			100%	
etc.			100%	

FACILITY-WIDE 12-CONSECUTIVE MONTH EMISSIONS LOG Year: _____

Month	Tons of VOC emitted per month by Source 02	Tons of VOC emitted per month by all other sources	Tons of VOC emitted per month (facility-wide)	Tons of VOC emitted per 12-conse. month period*
January				
February				
March				
etc.				

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

E4. Emission source.

60-0184-01	Source Description:	Fuel Burning Installation: Boilers B-2 Cleaver Brooks 600 HP (25.1 MMBtu/hr) and B-3 Cleaver Brooks 500 HP model CB 400-50 with low NOx Burner (20.4 MMBtu/hr). This source consists of two natural gas fired boilers used to provide steam for the foam products manufacturing operations. NSPS (40 CFR 60, Subpart Dc).
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E4-1. The stated heat input capacities of the boilers are as follows:

Boiler	Rated Heat Input Capacity (MMBtu/hr)	Applicable Standard
B-2	25.1	Subpart Dc
B-3	20.4	Subpart Dc

Should the permittee need to modify the boilers in a manner that increases the stated heat input rate, a construction permit or Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.01 and TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8) and the application dated February 10, 2023, from the permittee.

Compliance Method: The permittee shall maintain documentation to demonstrate the heat input rate for the boilers. Documentation shall include, but is not limited to, manufacturer’s specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

E4-2. Only natural gas shall be used as fuel for the boilers. Should the permittee need to modify the boilers to allow the use of a fuel other than natural gas, a construction permit or Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.01 and TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8) and the application dated February 10, 2023, from the permittee.

Compliance method: Compliance with this limit is assured based on the recordkeeping requirements specified in **Condition E4-9.**

E4-3. Particulate matter (PM) emitted from this source shall not exceed 0.46 pounds per hour on a daily average basis.

TAPCR 1200-03-06-.01(7) and the agreement letter dated agreement letter dated March 25, 2026. (**Attachment 3**)

Compliance Method: Compliance with the PM emission limitations is assured by compliance with **Conditions E4-1, E4-2** and the emission factor 7.6 lb/10⁶ scf from AP-42, 1.4 Natural Gas Combustion, Table 1.4-2.

E4-4. Sulfur dioxide (SO₂) emitted from this source shall not exceed 0.05 pounds per hour on a daily average basis.

TAPCR 1200-03-14-.01(3) and the agreement letter dated March 25, 2026. (**Attachment 3**)

Compliance Method: Compliance with the SO₂ emission limitations is assured by compliance with **Conditions E4-1, E4-2,** and the emission factor 0.6 lb/10⁶ scf from AP-42, 1.4 Natural Gas Combustion, Table 1.4-2.

E4-5. Volatile organic compounds (VOCs) emitted from this source shall not exceed 1.10 tons during any period of 12-consecutive months.

TAPCR 1200-03-06-.03(2) and the application dated February 10, 2023.

Compliance method: Compliance with the VOC emission limitation assured by compliance with **Conditions E4-1, E4-2,** and the emission factor 5.5 lb/10⁶ scf from AP-42, 1.4 Natural Gas Combustion, Table 1.4-2.

- E4-6.** Carbon monoxide (CO) emitted from this source shall not exceed 16.43 tons during any period of 12-consecutive months.

TAPCR 1200-03-06-.03(2) and the application dated February 10, 2023.

Compliance method: Compliance with the CO emission limitation is assured by compliance **Conditions E4-1, E4-2**, and the emission factor 84 lb/10⁶ scf from AP-42, 1.4 Natural Gas Combustion, Table 1.4-1.

- E4-7.** Nitrogen Oxides (NO_x) emitted from this source shall not exceed 13.60 tons during any period of 12-consecutive months.

TAPCR 1200-03-06-.03(2) and the application dated February 20, 2023.

Compliance method: Compliance with the NO_x emission limitation is assured by compliance with **Conditions E4-1, E4-2** and the emission factors 100 lb/10⁶ scf for boiler B-2 and 32 lb/10⁶ scf for boiler B-3 from AP-42, 1.4 Natural Gas Combustion, Table 1.4-1.

- E4-8.** NO_x emissions from boiler B-3 shall be controlled to reduce NO_x emissions by no less than 50% when combusting natural gas. (AP-42 Table 1.4-1 Controlled low-NO_x burners)

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

Compliance Method: The permittee has specified that boiler B-3 is equipped with low NO_x burners and flue gas recirculation. This unit shall not operate unless low NO_x burners and flue gas recirculation are fully operational. Documentation from the manufacturer for this unit which specifies that these features are present, and which also provides NO_x emission factors shall be maintained onsite and shall be made available for inspection by the Technical Secretary or an appointed representative.

- E4-9.** The permittee shall record and maintain records of the amount of natural gas combusted in each boiler subject to 40 CFR Subpart Dc during each calendar month. Alternatively, the permittee shall record and maintain records of the amount of natural gas delivered to the property during each calendar month.

TAPCR 1200-03-09-.03(8) and 40 CFR §60.48c(g)

Compliance Method: The permittee shall record the actual quantity of natural gas combusted or delivered to the property during each calendar month by each source subject to 40 CFR Subpart Dc in a log as found in **Attachment 2** or in an alternative format which provides the same information. The log shall be retained in accordance with **Condition E2(c)**. The log must indicate whether the record is for natural gas combusted by each boiler or natural gas delivered to the property.

60-0184-02	Source Description: Custom-shape expandable polystyrene foam products manufacturing consisting of raw material storage, three pre-expanders, 36 pre-puff storage bags, 18 molding presses, and finished goods storage.
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- E5-1.** Volatile organic compounds (VOC) emitted from this source are included in the facility-wide emission limitation outlined in **Condition E3-6**.

TAPCR 1200-03-07-.07(2) and TAPCR 1200-03-09-.01(4)

END OF TITLE V PERMIT #581131

ATTACHMENT 1

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

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

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

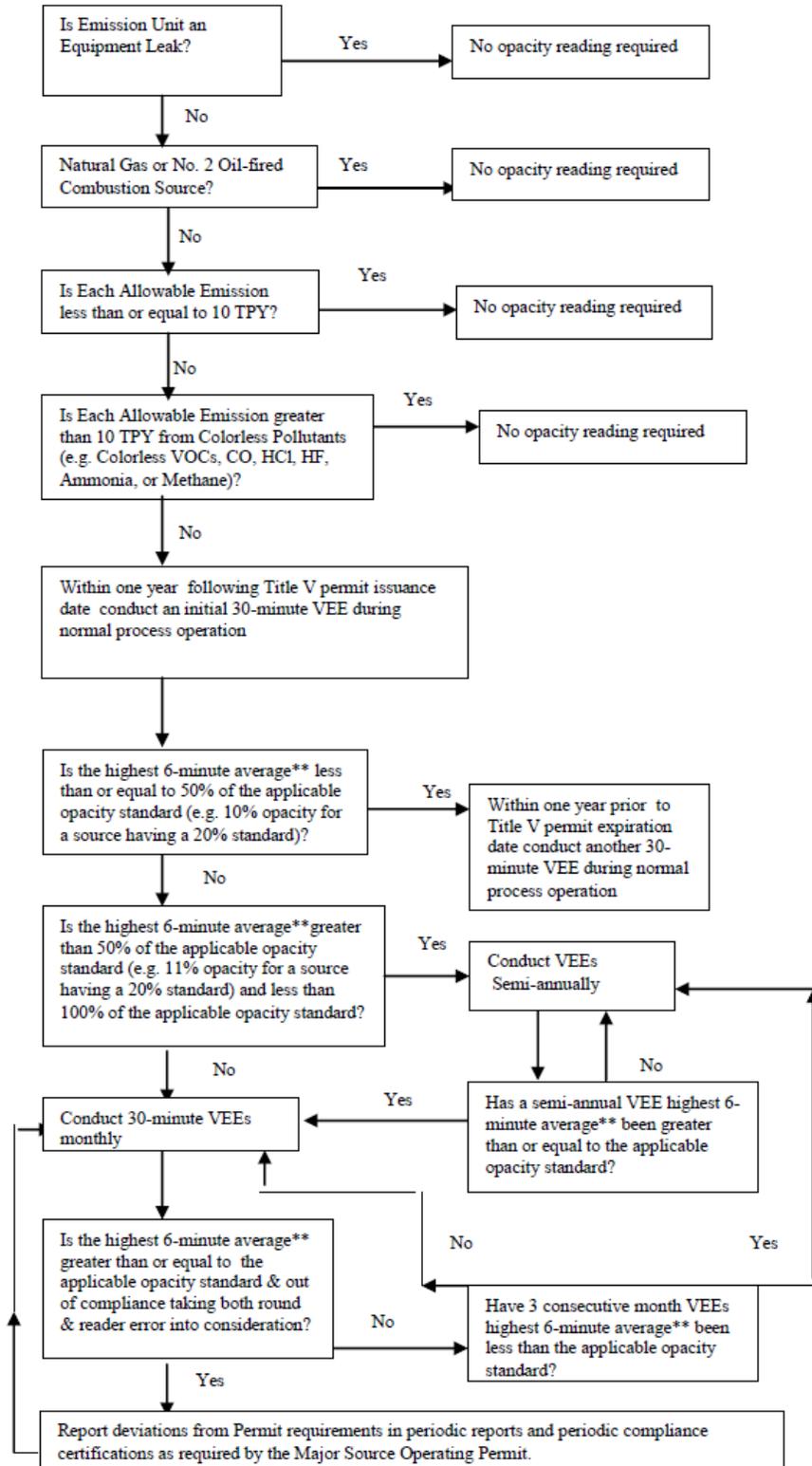
Reader Error
EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards: The TAPCD guidance is to declare non-compliance when the highest six-minute average** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

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

*Not applicable to Asbestos manufacturing subject to 40 CFR 61.142

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

Dated June 18, 1996
Amended September 11, 2013



ATTACHMENT 2

EXAMPLE LOGS

Monthly Natural Gas Combusted or Delivered Log

Year _____

Month	Natural Gas Combusted or Delivered (ft³)	Month	Natural Gas Combusted or Delivered (ft³)
January		July	
February		August	
March		September	
April		October	
May		November	
June		December	

Monthly HAP Calculation Table

Emissions										
[1]	[2]	[3]	[4]	[6]	[7]	[8]	[9]	[10]	[11]	[12]
Material ID	Material Name	Material Usage (gal/mo. or lb/mo.)	Material Density (lb/gal)	HAP ₁ Content (wt% or lb HAP ₁ /gal)	HAP ₂ ¹ Content (wt% or lb/HAP ₂ ¹ /gal)	Total HAP Content (wt% or lb HAP/gal)	HAP ₁ (lb/mo.)	HAP ₁ (tons/mo.)	Total HAP (lb/mo.)	Total HAP (tons/mo.)
Total										

¹ The columns for individual HAP should be repeated for each HAP contained in the materials used. Monthly emissions shall be calculated for each individual HAP. Identify each HAP by name and/or CAS# in the appropriate column headings.

[9] HAP₁ Emissions (lb/mo) = [3] Material Usage (gal/mo) * [4] Material Density (lb/gal) * [6] HAP₁ Content (wt%), or
 [9] HAP₁ Emissions (lb/mo) = [3] Material Usage (gal/mo) * [6] HAP₁ Content (lb/gal)

[10] HAP₁ Emissions (ton/mo) = [9] HAP₁ Emissions (lb/mo) / 2000 lb/ton

ATTACHMENT 3

AGREEMENT LETTER DATED MARCH 25, 2026

Permit Number 579204

Expiration Date: TBD



March 25, 2026

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

RE: Permit Agreement Letter
Ventek Solutions LLC
1323 North Main Street, Mount Pleasant
Emission Source Reference No. 60-0184-00 / Permit No. 581131

To the Technical Secretary:

On behalf of Ventek Solutions LLC, the following permit limitations are agreed upon for the expandable polystyrene product manufacturing operation located at the above referenced facility in order to avoid Prevention of Significant Air Quality Deterioration (PSD) pursuant to TAPCR 1200-03-09-.04(1) for Volatile Organic Compounds (VOC) emissions.

- Facility-Wide Limits
 - The Hazardous Air Pollutant (HAP) emissions from this facility, including emissions from exempt and insignificant emission units, shall not exceed the following: 9.9 tons during any period of 12-consecutive months of any individual Hazardous Air Pollutant (HAP), and 24.9 tons during any period of 12-consecutive months, of any combination of HAPs.
 - Compliance with this emission limitation shall be assured by the calculation of actual emissions of HAPs emitted during each calendar month and each period of 12-consecutive months and maintain records of the emissions in the log, in the format in Attachment 2 of permit 581131, or in an alternative format, which readily provides the same information.
 - The maximum Volatile Organic Compounds (VOCs) emitted from this facility, including insignificant and exempt sources, shall not exceed 247.1 tons during any period of 12-consecutive months.
 - Compliance with this emission limitation shall be assured by compliance with **Condition E3-6 and E4-5** of permit 581131. This condition includes recording the amount of VOC impregnated beads used, recording the VOC content of the beads (percentage of VOC by weight) during each calendar month, and calculating the VOC emissions during each calendar month and each period of 12-consecutive months.
 - Source 01
 - The maximum Particulate Matter (PM) emitted by this source shall not exceed 0.46 pounds per hour on a daily average basis.
 - The maximum Sulfur Dioxide (SO₂) emitted by this source shall not exceed 0.05 pounds per hour on a daily average basis.
 - Compliance with the emission limits shall be assured by the total heat input rate (45.5 MMBtu/hr) of the source, combusting only natural gas as outlined in **Condition E4-1 and E4-2** of permit 581131, and the boiler emission factors in Chapter 1.4 of AP-42 as outlined in **Conditions E4-3 and E4-4**.
-

Should you have any questions or require additional information, please contact Jason Robinson via phone at 717-304-1767 or via e-mail at jason.robinson@venteksolutions.com.

On behalf of Ventek Solutions Mt. Pleasant TV facility, I agree to the above limitations. I am authorized to represent and bind the facility in environmental affairs.

Signature Jason W. Helton

Name (printed) Jason Helton

Title Vice President of Operations

Date March 25, 2026

ATTACHMENT 4

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.



STATEMENT OF BASIS
Page 1 of 5
TDEC Division of Air Pollution Control

Facility Name: Ventek Solutions LLC
Permit Number: 581131
Permit Writer: ETT

Facility ID Number: 60-0184
Date Application Received: February 10, 2023
Date Application Completed: February 10, 2023

FACILITY CATEGORY

This facility is a major source of emissions. The facility-wide PTE of one or more regulated air pollutants (Volatile Organic Compounds (VOCs)) is at or above the Prevention of Significant Deterioration (PSD) and Title V major source thresholds. The facility has accepted federally enforceable limitations /restrictions to remain below (and avoid) the PSD threshold level. The PSD applicability threshold for this facility is 250 TPY because it is not one of the 28 listed source categories in the PSD regulations.

FACILITY DESCRIPTION

Foam molding facility in which expandable polystyrene (EPS) and/or polystyrene co-polymer (ARCEL, etc.) beads are expanded and molded into custom shapes for packaging, materials handling, and structural component uses.

PROJECT DESCRIPTION

Ventek Solutions LLC is requesting a Title V Operating Permit Renewal. The facility contains an expandable polystyrene foam products operation and two natural gas-fired boilers.

Emissions from this facility include Particulate Matter (PM), Sulfur Dioxide (SO₂), Carbon Monoxide (CO), Volatile Organic Compounds (VOC), Nitrogen Oxides (NO_x), and hazardous air pollutants (HAPs).

Controls at this facility include low NO_x burner and a flue gas recirculation device for boiler B-3.

COMPLIANCE STATUS

This facility is located in an attainment area for all criteria pollutants according to the NAAQS.

The date of the last inspection occurred on November 6, 2024. The facility is in compliance with the applicable requirements of the permit.

No violation of permit conditions observed.

COLLOCATION DETERMINATION

Collocation is not applicable to this facility.

PUBLIC NOTICE

This Title V Permit (Renewal) will undergo a 30-day public notice period and a 45-day EPA comment period in accordance with TAPCR 1200-03-09-.02(11). The notice was published on the TDEC website on <date>.

The affected states/counties were notified on <date>.

- State of Alabama
- Nashville/Davidson County local air pollution program
- Columbia Environmental Field Office

ADDITIONAL PUBLIC PARTICIPATION

There were no public/epa comments for this permit.

There were comments on this permit as follows: (include any comments from the public/EPA)

A public hearing was held for this permit on <date>.

A public meeting was held for this permit on <date>.



STATEMENT OF BASIS
Page 2 of 5
TDEC Division of Air Pollution Control

Facility Name: Ventek Solutions LLC
Permit Number: 581131
Permit Writer: ETT

Facility ID Number: 60-0184
Date Application Received: February 10, 2023
Date Application Completed: February 10, 2023

Table 1A: FACILITY EMISSION SOURCES

<i>Source Number</i>	<i>Source Description</i>	<i>Permitted</i>	<i>Exempt/Insignificant</i>	<i>PBR</i>
01	Fuel Burning Installation: Two Natural Gas-Fired Steam Boilers (25.1 MMBtu/hr. and 20.4 MMBtu/hr.)	X		
02	Expandable Polystyrene Foam Products Manufacturing	X		
03	Foam Operation		X	
N/A	Two 10,000-gallon fuel oil tanks, polypropylene molding presses, polypropylene curing oven, cooling towers, and repair, maintenance, cleaning operations.		X	

Table 1B: CHANGES SINCE LAST PERMIT ISSUANCE

The facility has removed the ability to burn fuel oil and requested that the permit be updated accordingly.

REGULATORY APPLICABILITY REVIEW

Regulations	Comments/ Requirements (Monitoring/Recordkeeping/Reporting/Testing)
Chapter 6 TAPCR 1200-03-06-.01(7) TAPCR 1200-03-06-.03(2)	Applicable: This facility has fuel burning sources. Compliance is assured by the following: heat input rate, fuel type, emission factors from AP-42 Chapter 1.4, recordkeeping of fuel, low NOx burners and flue gas recirculation.
Chapter 7 TAPCR 1200-03-07-.07(2)	Applicable: This facility has process emission sources. Compliance is assured by the following: monthly facility-wide recordkeeping and a 12-consecutive month recordkeeping.
Chapter 10	Not Applicable: This facility is not subject to any source testing requirements outlined in this chapter.
Chapter 14 TAPCR 1200-03-14-.01(3)	Applicable: This facility has sources that emit SO ₂ . Compliance is assured by the following: heat input rate, fuel type, and the emission factors from AP-42 Chapter 1.4.
Other state regulations: Chapter(s) 16, 18, 22, 25, 27, etc.	Not Applicable: This facility does not contain sources subject to these chapters.
40 CFR 60 (NSPS)	Applicable: The Fuel Burning Installation is subject to 40 CFR 60 Subpart Dc: Standards Of Performance For Small Industrial-Commercial-Institutional Steam Generating Units. Construction for each boiler commenced after June 9, 1989, and each boiler's heat input capacity is greater than 10 MMBtu/hr.



STATEMENT OF BASIS
Page 3 of 5
TDEC Division of Air Pollution Control

Facility Name: Ventek Solutions LLC
Permit Number: 581131
Permit Writer: ETT

Facility ID Number: 60-0184
Date Application Received: February 10, 2023
Date Application Completed: February 10, 2023

REGULATORY APPLICABILITY REVIEW

Regulations	Comments/ Requirements (Monitoring/Recordkeeping/Reporting/Testing)
40 CFR 61 <i>(NESHAP)</i>	Not Applicable: This facility does not emit the pollutants (benzene, beryllium, arsenic, vinyl chloride or radon)subject to this regulation.
40 CFR 62 <i>Federal Plans</i>	Not Applicable: This facility is not subject to any Federal Plans specified in 40 CFR 62.13
40 CFR 63 <i>(NESHAP)</i>	Not Applicable: The facility is not a major source of HAP emissions. HAP emissions are less than 10 TPY for a single HAP and 25 TPY for total HAPs.
40 CFR 68 <i>112(r)</i>	Not Applicable: The facility does not use or store the subject chemicals above threshold quantities.
40 CFR 64 <i>CAM</i>	Not Applicable: This is a Title V facility, but the Pollutant Specific Emissions Unit (PSEU) does not meet the applicability criteria outlined in 40 CFR 64.
<u>Special Conditions, Monitoring, Limits</u>	Applicable: Boiler B-3 will be equipped with low NOx burners and flue gas recirculation to comply with NOx emissions. Compliance will include boiler B-3 shall not operate unless low NOx burners and flue gas recirculation are fully operational and documentation from the manufacturer for this unit which specifies that these features are present, and which also provides NOx emission factors.
Modeling Review	Not Applicable: This facility does not emit Pb, HCl or HF.
Previous Permit Number	572705



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 TDEC Division of Air Pollution Control

Facility Name: Ventek Solutions LLC
 Permit Number: 581131
 Permit Writer: ETT

Facility ID Number: 60-0184
 Date Application Received: February 10, 2023
 Date Application Completed: February 10, 2023

EMISSION SUMMARY

Table 2: SOURCE SPECIFIC EMISSIONS

PERMIT EMISSIONS					
SOURCE 01 – Fuel Burning Installation					
Pollutant	Actual/Controlled Emissions	Regulatory Allowable Emissions	Uncontrolled Emissions	Potential to Emit (PTE)	Permitted Allowable
	lb/hr	gr/dscf/lb/hr/lb/MMBTU	lb/hr	lb/hr	gr/dscf/lb/hr/lb/MMBTU
PM/PM ₁₀ /PM _{2.5}	0.34	0.2585 lb/MMBtu (11.75 lb/hr)	0.34	0.34	0.46 lb/hr
SO ₂	0.03	5 lb/MMBtu (227.5 lb/hr)	0.03	0.03	0.05 lb/hr

PERMIT EMISSIONS				
SOURCE 01 – Fuel Burning Installation				
Pollutant	Actual/Controlled Emissions	Uncontrolled Emissions	Potential to Emit (PTE)	Allowable/Permitted Allowable
	TPY	TPY	TPY	TPY
PM/PM ₁₀ /PM _{2.5}	1.50	1.50	1.50	2.02
SO ₂	0.13	0.13	0.13	0.20
NO _x	13.60	13.60	13.60	13.60
CO	16.43	16.43	16.43	16.43
VOC	1.10	1.10	1.10	1.10

PERMIT EMISSIONS				
SOURCE 02 – Expandable Polystyrene Foam Products Manufacturing				
Pollutant	Actual/Controlled Emissions	Uncontrolled Emissions	Potential to Emit (PTE)	Allowable/Permitted Allowable
	TPY	TPY	TPY	TPY
VOC	245.0	1401.6	1401.6	<i>included in facility-wide emission table</i>

Table 3: FACILITY WIDE EMISSIONS

FACILITY WIDE EMISSIONS			
Pollutant	Actual/Controlled Emissions	Uncontrolled Emissions	Potential to Emit (PTE)
	TPY	TPY	TPY
PM/PM ₁₀ /PM _{2.5}	1.50	1.50	1.50
SO ₂	0.13	0.13	0.13
NO _x	13.60	13.60	13.60
CO	16.43	16.43	16.43
VOC	247.1	1403.7	1403.7
Single HAP	0.06	0.06	0.06
Total HAPs	0.09	0.09	0.09



STATEMENT OF BASIS
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TDEC Division of Air Pollution Control

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Table 4: FACILITY WIDE EMISSION LIMIT

Pollutant	TPY
VOC	247.1
Single HAP	9.9
Total HAPs	24.9

Note: Please reference the signed agreement letter dated March 25, 2026.

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.