

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



MINOR MODIFICATION #2

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

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

Date Issued: July 9, 2018

Date of Minor Modification #1: October 11, 2022

Permit Number: 572478

Date of Minor Modification #2: TBD

Date Expires: July 9, 2023

Issued To:

The Carlstar Group, LLC

Installation Address:

520 J. D. Yarnell Industrial Parkway
Clinton, TN 37716

Installation Description: Rubber Tire Manufacturer

01: Rubber Processing

04: Tire Building

05: Two Boilers using natural gas and #2 fuel oil

07: Raw Material Handling.

08: Rubber Mixing

Emission Source Reference No.: 01-0114

Renewal Application Due Date:

Between October 12, 2022 and January 10, 2023

Primary SIC: 3011

Information Relied Upon:

Previous Title V Permit 562998

Permit application dated January 31, 2017

Supplemental information October 16, 2017

Significant Modification Application dated May 30, 2018

Minor Modification Application dated June 1, 2022

Minor Modification Application dated November 12, 2024

Revised Minor Modification Application dated December 27, 2024

TECHNICAL SECRETARY

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

POST AT INSTALLATION ADDRESS

RDA-1298

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SECTION A

GENERAL PERMIT CONDITIONS

A permit issued under the provisions of Tennessee Comprehensive Rules and Regulations (Tenn. Comp. R. & Regs.) 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 CFR¹, Part 70.

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

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 item 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, 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)

¹ CFR = Code of Federal Regulations

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

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

A8. Fee payment.

(a) The permittee shall pay an annual Title V emission fee based upon the responsible official's choice of actual emissions, allowable emissions, or a combination of actual and allowable emissions; and on the responsible official's choice of annual accounting period. An emission cap of 4,000 tons per year per regulated pollutant per 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 pay their Title V fee based upon their choice of actual or allowable based fees, or mixed actual and allowable based fees. Once permitted, the Responsible Official may revise their existing fee choice by submitting a written request to the Division no later than December 31 of the annual accounting period for which the fee is due.

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

(d) Where more than one (1) allowable emission limit is applicable to a regulated pollutant, the allowable emissions for the regulated pollutants shall not be double counted. Major sources subject to the provisions of TAPCR Paragraph 1200-03-26-.02(9) shall apportion their emissions as follows to ensure that their fees are not double counted.

1. Sources that are subject to federally promulgated hazardous air pollutant standards that can be imposed under TAPCR Chapter 0400-30-38 or Chapter 1200-03-31 will place such regulated emissions in the regulated hazardous air pollutant (HAP) category

2. A category of miscellaneous HAPs shall be used for hazardous air pollutants listed at TAPCR part 1200-03-26-.02(2)(i)12 that are not subject to federally promulgated hazardous air pollutant standards under 40 CFR 60, 61, or 63 or TAPCR chapter 1200-03-31.

3. HAPs that are also in the family of volatile organic compounds, particulate matter, or PM₁₀ shall not be placed in either the regulated HAP category or miscellaneous HAP category.

4. Sources that are subject to a provision of TAPCR Chapter 1200-03-16 New Source Performance Standards (NSPS), TAPCR 0400-30-39 Standards of Performance for New Stationary Sources, or 40 CFR 60 for pollutants that are neither particulate matter, PM₁₀, sulfur dioxide (SO₂), volatile organic compounds (VOC), nitrogen oxides (NO_x), or hazardous air pollutants (HAPs) will place such regulated emissions in an NSPS pollutant category.

5. The regulated HAP category, the miscellaneous HAP category, and the NSPS pollutant category are each subject to the 4,000 ton cap provisions of TAPCR subpart 1200-03-26-.02(2)(i).

6. 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 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 Title V 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 subpart 1200-03-26-.02(2)(i) shall also apply to PM₁₀ emissions.

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

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

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

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

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

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

- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) As authorized by the Clean Air Act and TAPCR Chapter 1200-03-10, 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 Clean Air 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.² §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) Provided that 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

² T.C.A. = Tennessee Code Annotated

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 condition 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 Paragraph 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 1200-03-09-.03(1) and 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 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 and Toxics 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. Reserved

B8. Excess emissions reporting.

(a) The permittee shall promptly notify the Technical Secretary when any emission source, air pollution control equipment, or related facility breaks down in such a manner to cause the emission of air contaminants in excess of the applicable emission standards contained in TAPCR Division 1200-03 or any permit issued thereto, or of sufficient duration to cause damage to property or public health. The permittee must provide the Technical Secretary with a statement giving all pertinent facts, including the estimated duration of the breakdown. 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 (20) days after receipt of the notice of violation, the data required below. If this data has previously been 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 twenty (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 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 twenty (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), subparagraph 1200-03-09-.02(11)(f), and 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.

Minor Modification #2 to Permit No: 572478

Expiration Date: July 9, 2023

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

SECTION D

GENERAL APPLICABLE REQUIREMENTS

- D1. Visible emissions.** 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 twenty (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 twenty (20) percent (6-minute average) except for one six minute period per one (1) hour of not more than forty (40) percent opacity. Sources constructed or modified after July 7, 1992 shall utilize 6-minute averaging.
- 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), 1200-03-05-.03(6) and 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 Chapter 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, oil, water, or suitable chemicals on dirt roads, material stock piles, 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 twenty (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 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 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)1 and compliance requirements of TAPCR 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. Where applicable, the permittee shall comply with the TAPCR 0400-30-38 for all emission sources subject to a requirement contained therein.

TAPCR Chapter 0400-30-38

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. Where applicable, the permittee shall comply with the 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

SECTION E

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

E1 (MM2). Fee payment:

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 01-0114

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	61.40	AEAR	Includes all fee emissions
PM₁₀	N/A	AEAR	Includes all fee emissions
SO₂	9.51	AEAR	Includes all fee emissions
VOC	267.24	AEAR	Includes all fee emissions
NO_x	51.58	AEAR	Includes all fee emissions
CATEGORY OF MISCELLANEOUS HAZARDOUS AIR POLLUTANTS (HAP WITHOUT A STANDARD)*			
VOC FAMILY GROUP	N/A	AEAR	Fee emissions included in VOC
NON-VOC GASEOUS GROUP	N/A	AEAR	
PM FAMILY GROUP	N/A	AEAR	
CATEGORY OF SPECIFIC HAZARDOUS AIR POLLUTANTS (HAP WITH A STANDARD)**			
VOC FAMILY GROUP	N/A	N/A	
NON-VOC GASEOUS GROUP	N/A	N/A	
PM FAMILY GROUP	N/A	N/A	
CATEGORY OF NSPS POLLUTANTS NOT LISTED ABOVE***			
EACH NSPS POLLUTANT NOT LISTED ABOVE	N/A	AEAR	VOC emissions included above.

NOTES

AAP The **Annual Accounting Period (AAP)** is a twelve (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 minor modification #2 issuance **began July 1, 2024 and ends June 30, 2025** The next Annual Accounting Period begins **July 1, 2025**, and ends **June 30, 2026**, unless a request to change the annual accounting period is submitted by the responsible official as required by subparagraph 1200-03-26-.02(9)(b) 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.

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, SO₂, VOC, NO_x and so forth. See TAPCR 1200-03-26-.02(2)(i) for the definition of a regulated pollutant.),
- (2) **each pollutant group** (VOC Family, Non-VOC Gaseous, and Particulate Family),
- (3) **the Miscellaneous HAP Category,**
- (4) **the Specific HAP Category,** and
- (5) **the NSPS Category**

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

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

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

*** **Category Of NSPS Pollutants Not Listed Above:** This category is made-up of each New Source Performance Standard (NSPS) pollutant whose emissions are not included in the **PM, SO₂, VOC or NO_x** emissions from each source in this permit. **For fee computation,** each **NSPS pollutant not listed above** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

END NOTES

- The permittee shall:**
- (1) Pay Title V **annual emission fees**, on the emissions and year bases requested by the responsible official and approved by the Technical Secretary, for each annual accounting period (AAP) by the payment deadline(s) established in TAPCR 1200-03-26-.02(9)(g). Fees may be paid on an **actual, allowable, or mixed** emissions basis; and on either a **state fiscal year** or a **calendar year**, provided the requirements of 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 fifteen (15) days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8).
 - (2) Sources paying annual emissions fees on an allowable emissions basis: pay annual allowable based emission fees for each annual accounting period pursuant to TAPCR 1200-03-26-.02(9)(d).
 - (3) Sources paying annual emissions fees on an actual emissions basis: prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
 - (a) the completed **Fee Emissions Summary Table**,
 - (b) each **actual emissions analysis** required, and
 - (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. These calculations must be based on the annual fee basis approved by the Technical Secretary (a state fiscal year [July 1 through June 30] or a calendar year [January 1 through December 31]). These records shall be used to complete the **actual emissions analyses** required by the above **Fee Emissions Summary Table**.
 - (4) Sources paying annual emissions fees on a mixed emissions basis: for all pollutants and all sources for which the permittee has chosen an actual emissions basis, prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:

- (a) the completed **Fee Emissions Summary Table**,
- (b) each **actual emissions analysis** required, and
- (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. These calculations must be based on the fee bases approved by the Technical Secretary (payment on an actual or mixed emissions basis) and payment on a state fiscal year (July 1 through June 30) or a calendar year (January 1 through December 31). These records shall be used to complete the **actual emissions analysis**. For all pollutants and all sources for which the permittee has chosen an allowable emissions basis, pay allowable based emission fees pursuant to TAPCR1200-03-26-.02(9)(d).
- (5) When paying on an actual or mixed emissions basis, submit the **actual emissions analyses** at the time the fees are paid in full.

The annual emission fee due dates are specified in TAPCR 1200-03-26-.02 and are dependent on the Responsible Official's choice of fee basis as described above. If any part of any fee imposed under TAPCR1200-03-26-.02 is not paid within fifteen (15) days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8). Emissions for regulated pollutants shall not be double counted as specified in Condition A8(d) of this permit.

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

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

Actual Emissions Analyses to:
The Tennessee Department of Environment and Conservation
Division of Air Pollution Control
East Tennessee Permit Program
Davy Crockett Tower, 7th Floor
500 James Robertson Parkway
Nashville, Tennessee 37243

or

An electronic copy (PDF) of actual emissions analysis can also be submitted to: apc.inventory@tn.gov

E2. Reporting requirements

(a) **Semiannual reports.** Semiannual reports shall cover the 6-month periods from **October 1** through **March 31** and **April 1** through **September 30**, and shall be submitted within 60 days after the end of the 6-month periods. All instances of deviations from permit requirements must be clearly identified in these reports and the reports must be certified by a responsible official.

These semiannual reports shall include:

- (1) Reports of any monitoring, recordkeeping and calculated emission rates required by **Conditions E3-7, E4-1, E4-2, E4-5, E5-1, E5-2, E5-3, E6-8, E6-16, E7-1, and E8-2** of this permit. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (2) The visible emission evaluation readings from **Condition E3-2** for all regulated stack emission 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**.

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.

TAPCR1200-03-09-.02(11)(e)1.(iii)

(b) **Annual compliance certification.** The permittee shall submit annually compliance certifications with terms and conditions contained in Sections A, B, D, & 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.

The certification shall cover the 12-month period from October 1 to September 30, and shall be submitted within 60 days after the 12-month period ends.

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

Technical Secretary
Division of Air Pollution Control
Knoxville Environmental Field Office
3711 Middlebrook Pike
Knoxville, TN 37921

and Air Enforcement and Toxics Branch
US EPA Region IV
61 Forsyth Street, SW
Atlanta, Georgia 30303

In lieu of submitting a paper copy to the above address for the Knoxville Field Office, an electronic copy (PDF) can also be submitted to the following email address:

APC.KnoxEFO@tn.gov

1200-03-09-.02(11) e 1(iii) and 40 CFR 70.6(c)(5)(iii)

E3. General Conditions

- E3-1.** Purchase orders or invoices for all volatile organic compound (VOC) and HAP containing materials associated with the permitted processes must be maintained and kept available for inspection by the Technical Secretary or representative. These orders or invoices must be retained for not less than five (5) years. The as-supplied VOC and HAP content of all VOC-and HAP-containing materials used at this facility may be determined by using manufacturer or vendor certification that explicitly lists the VOC or HAP content by weight.

TAPCR 1200-03-09

E3-2. Visible emissions from this facility shall not exhibit greater than twenty percent (20%) opacity, except for one (1) six-minute period in any one (1) hour period and for no more than four (4) six-minute periods in any twenty-four (24) hour period. Visible emissions 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 updated on September 11, 2013. (Enclosed as Attachment 1).

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

E3-3 (SM1). The as-supplied VOC and HAP content of all VOC and HAP-containing materials to be used by this facility shall be determined as follows:

All Cements, Adhesives, Thinners, and Solvents - from Safety Data Sheets (SDS) or manufacturer or vendor formulation data which explicitly list the VOC and HAP content by weight.

The results of these determinations shall be compiled in the following tabular format or an alternative format which readily provides the same required information. This table, along with SDS or other supporting documentation for each material used, shall be maintained at the source location and made available for inspection by the Technical Secretary or their representative

As-Supplied VOC and HAP Content to 01-0114						
Process Material Description	Date of Initial Usage	Material Density (lb/gal)	VOC Content (lb/gal)	HAP #1 Content (lb/gal)	HAP #2 Content* (lb/gal)	Solids Content (lb/gal)
Material #1						
Material #2						
Material #3*						

*This table may be expanded to include additional materials and/or HAPs as required

Tenn Comp. R. & Regs. 1200-03-09-.03(8) and 1200-03-10-.02(2)(a)

E3-4. Routine maintenance, as required to maintain specified emission limits, shall be performed on the air pollution control device(s). Maintenance records shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than five years.

TAPCR 1200-03-09

E3-5. Regarding recordkeeping of logs, the following is applicable:

- (a) For sources required to maintain monthly logs:
All data, including all required calculations, must be entered in the log no later than thirty (30) days from the end of the month for which the data is required.
- (b) For sources required to maintain weekly logs:
All data, including all required calculations, must be entered in the log no later than seven (7) days from the end of the week for which the data is required.
- (c) For sources required to maintain daily logs:
All data, including all required calculations, must be entered into the log no later than seven (7) days from the end of the day for which the data is required.

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

E3-6 (SM1). Volatile organic compounds (VOC) emitted from this facility shall not exceed **267.24** tons during all intervals of 12 consecutive months.

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

Compliance Method: The permittee shall sum the monthly VOC emissions from the tables referenced below and insignificant activities on a monthly basis and enter the data in the table below or in a similar format within 30 days after the end of the month. In addition, the permittee shall calculate the 12-consecutive month summary using the month just reported plus the previous 11 months.

Monthly and 12 Consecutive Month Summary VOC Emissions							
Month/Year	VOC Emissions Table 6 (tons)	VOC Emissions Table 11 (tons)	VOC Emissions Table 13 (tons)	VOC Emissions Table 12b (tons)	Insignificant Sources (tons)	Monthly VOC Emissions (tons)	12-Consecutive Month VOC Emissions (tons)
Month 1/Year					0.085		
Month 2/Year					0.085		
Etc.							

Notes:

* The tons per 12-consecutive Month value is the sum of the VOC emissions in the 11 months preceding the month just completed plus the HAPs emissions in the month just completed. All data, including all required calculations, must be entered in accordance with **Condition E3-5**.

E3-7(SM1). Plantwide emissions of any hazardous air pollutant (HAP) listed in Section 112 of the Federal Clean Air Act shall not exceed **9.9** tons during all intervals of 12 consecutive months. Emissions of any combination of HAPs shall not exceed **24.9** tons during all intervals of 12 consecutive months.

Compliance Method: The permittee shall keep records in the following format to show compliance with the above limit.

MONTHLY TOTAL HAPs EMISSIONS FROM FACILITY (01-0114) Month _____ Year

Process	Material processed (lb/mo)	HAP1 Emission Factor (lb HAPs/lb Material Processed)	HAP1 Emitted Tons Per Month	HAP1 Emissions (tons per 12 consecutive months)*	HAPn Emission Factor (lb HAPs/lb Material Processed)	HAPn Emitted Tons Per Month	HAPn Emissions (tons per 12 consecutive months)	Total HAPs Emitted (tons/mo)	Total HAPs Emitted (tons per 12 consecutive months)
Process A									
Process B									
Etc.									
Insig. Sources									
Total									

Notes:

* The tons per 12-consecutive Month value is the sum of the HAPs emissions in the 11 months preceding the month just completed plus the HAPs emissions in the month just completed. All data, including all required calculations, must be entered in accordance with **Condition E3-5**.

E3-8. The permittee listed various insignificant and exempt activities in their Title V application per Rule 1200-03-09-.04(5). Additional insignificant activities may be added and operated at any time with the provision that a written notification shall be submitted to the Technical Secretary including an updated APC V-2 application form along with a truth, accuracy and completeness statement signed by a responsible official.

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

E3-9. The permittee shall comply with all the terms and conditions of the Title V permit #572478 and the modifications for this source.

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

E3-10 (AA1). Identification of Responsible Official, Technical Contact, and Billing Contact:

(a) The applications that were utilized in the preparation of this permit are dated January 31, 2017 and October 16, 2017. The application dated January 31, 2017, was signed by Jim Fitzgerald. The most recent application was signed by Responsible Official, Phil Hubert, Plant Manager of the permitted facility. If this person terminates his employment or is assigned different duties such that he is no longer a Responsible Official for this facility as defined in part 1200-03-09-.02(11)(b)21 of the Tennessee Air Pollution Control Regulations, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty (30) days of the change. The notification shall include the name and title of the new Responsible Official and certification of truth and accuracy. All representations, agreement to terms and conditions, and covenants made by the former Responsible Official that were used in the establishment of the permit terms and conditions will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements, and/or covenants.

(b) The applications that were utilized in the preparation of this permit are dated January 31, 2017 and October 16, 2017, and identify Joe Cox, EHS Manager as the Principal Technical Contact for the permitted facility. Correspondence dated January 15, 2020, designates Chris Blaylock, EHS Manager, as the Principal Technical Contact. The application dated April 10, 2023, notified the Division of a new Technical Contact, Mike Wharton, for the permitted facility. If this person terminates his employment or is assigned different duties such that he is no longer the Principal Technical Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty (30) days of the change. The notification shall include the name and title of the new Principal Technical Contact and certification of truth and accuracy.

(c) The applications that were utilized in the preparation of this permit are dated January 31, 2017, and October 16, 2017, and identify Joe Cox, EHS Manager as the Billing Contact for the permitted facility. Correspondence dated January 15, 2020, designates Chris Blaylock, EHS Manager, as the Billing Contact. The application dated April 10, 2023, notified the Division of a new Billing Contact, Mike Wharton, for the permitted facility. If this person terminates her employment or is assigned different duties such that he is no longer the Billing Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty (30) days of the change. The notification shall include the name and title of the new Billing Contact and certification of truth and accuracy.

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

01-0114-01	Rubber Processing	Stock rubber leaving the Banbury mixer is sent to the tread extruders to be processed.
		<p>Line #1: the “hot” feed line begins with four warming mills. The rubber is warmed by the milling process and is sent through the extruders. After the stock rubber is extruded, cement is sprayed onto the rubber and the sheets are cut into sections and sent to tire assembly. Line #1 is an existing process so it has no other requirement than the VOC emissions. Stack no. 01-E1(a) and 01-E1(b)</p> <p>Line #2: the “cold” feed line, does not require milling before extrusion. After the stock rubber is extruded, cement is sprayed onto the rubber and the sheets are cut into sections and sent to tire assembly. Undertread cementing and tread end cementing operation. NSPS Subpart BBB (Rubber Tire Manufacturing Industry) applies to this line (Line #2). Stack no. 01-E2. An additional extruder was added to Line 2, to apply gum cushion tread compound to the tread rubber.</p> <p>Line #3: includes 1st and 2nd stage tire layup machines for radial tire manufacturing</p>

E4-1. Total (uncontrolled) VOC use for the **Line 2** undertread cementing operation shall be less than or equal to the following levels, depending on the duration of the compliance period:

- (I) 3,870 kilograms (8532 lbs) of VOC per 28 days
- (II) 4,010 kilograms (8,846 lbs) of VOC per 29 days
- (III) 4,150 kilograms (9,149 lbs) of VOC per 30 days
- (IV) 4,280 kilograms (9,436 lbs) of VOC per 31 days
- (V) 4,840 kilograms (10,670 lbs) of VOC per 35 days

40 CFR Part 60 subpart BBB §60.542 (a) (1)

Compliance Method: Compliance shall be assured by maintaining records of material usage in the following form or equivalent:

Table 1: NSPS VOC EMISSIONS FOR UNDERTREAD CEMENTING

Compliance period (I), (II), ...etc	Cement Usage-exclusively for under tread cementing gallons Lc	Cement Density (pounds/gallon) Dc	Weight fraction of VOC in cement Wo	VOC emissions Pounds Mo

$$Mo = \sum (Lci)(Dci)(Woi)$$

E4-2. For each sidewall cementing operation (Lines 2 or 3):

Maintain total (uncontrolled) VOC use less than or equal to the levels specified below, depending upon the duration of the compliance period:

- (I) 3,220 kg (7,099 lb) of VOC per 28 days,
- (II) 3,340 kg (7,363 lb) of VOC per 29 days,
- (III) 3,450 kg (7,606 lb) of VOC per 30 days,
- (IV) 3,570 kg (7,870 lb) of VOC per 31 days, or
- (V) 4,030 kg (8,885 lb) of VOC per 35 days.

40 CFR Part 60 subpart BBB §60.542(a)(2) (ii)

Compliance Method: Compliance is assured by maintaining records of the amount of sidewall cement used and the VOC content of the sidewall cement used per month in the following form or equivalent.

Table 2: NSPS VOC EMISSIONS FOR SIDEWALL CEMENTING

Compliance period (I), (II), ...etc	Cement Usage-exclusively for under tread cementing gallons Lc	Cement Density (pounds/gallon) Dc	Weight fraction of VOC in cement Wo	VOC emissions Pounds Mo

E4-3. The owner or operator shall conduct monthly performance tests if not using water based tread end cements.

The owner or operator of each tread end cementing operation and each green tire spraying operation **subject to the Rubber Tire NSPS (Lines 2 and 3)**, using only water-based sprays (inside and/or outside) containing less than 1.0 percent, by weight, of VOC is not required to conduct a monthly performance test. In lieu of conducting a monthly performance test, the owner or operator of each tread end cementing operation and each green tire spraying operation shall submit formulation data or the results of Method 24 analysis annually to verify the VOC content of each tread end cement and each green tire spray material, provided the spraying formulation has not changed during the previous 12 months. If the spray material formulation changes, formulation data or Method 24 analysis of the new spray shall be conducted to determine the VOC content of the spray and reported within 30 days as required under 40 CFR §60.546(j).

40CFR Part 60 Subpart BBB §60.543(b)(4) and TAPCR 1200-03-09-.03(8)

E4-4. VOC emissions for tread-end cementing for **Lines 2 and 3** shall be no more than 10 grams of VOC (0.022 pounds) per tire cemented, on a monthly basis.

40 CFR Part 60 subpart BBB §60.542(a)(3) and TAPCR 1200-03-09-.03(8)

Compliance Method: Compliance with above limit shall be assured by maintaining records of material usage in the following form or equivalent.

Table 3: TREAD-END CEMENTING VOC EMISSIONS (LINES 2 and 3)

Month	Cement Usage- exclusively for tread end spraying (gallons) Lc	Cement Density (pounds per gallon) Dc	Weight Fraction of VOC Wo	Total VOC emissions (pounds) Mo	Number of tires produced per month To	pounds of VOC per tire G

$$Mo = \sum_{i=1}^a (Lc)(Dc)(Wo)$$

$$G = Mo/To$$

E4-5. Volatile organic compounds and hazardous air pollutants (HAPs) emitted from Lines #1, #2, and #3 including VOCs from tread cementing, solvents and rubber processing, shall be calculated by maintaining records of material usage and VOC emissions in the form of **Tables 4, 5 and 6 or equivalent**. The calculations in Table 6 will also be used to report the fee emissions required by **Condition E1**.

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

Table 4: MONTHLY VOC LOG (Rubber Processing) Month/Year: _____

	A	B	C	D	F
Type of Rubber	Total Rubber Processed (lbs.)	VOC Emission Factor*(lb VOC/lb of rubber processed.)	VOC Emissions (tons/mo.)	HAP (lbs per lb of rubber processed)	Total HAP emissions (tons/mo)
Fabric		0.000475		0.0000840	
Bead		0.0000515		0.0000225	
Tread		0.000258		0.0000585	

For each month, the monthly VOC emissions due to rubber processing operations (Column C) are to be calculated according to the following equation (letters represent columns in Table 3: $C=(A)X(B)/(2000)$).

* Rubber Manufacturers Association Emission Factors

Table 5: Material Usage

Month	Material Name	Total Material (cement, solvents etc) Used (gallons/month)	VOC content (pounds/gallon)	VOC Emissions (pounds/mo.)	HAP (%)	Total HAP emissions (pounds/mo)

Table 6: Total VOC and HAPs from rubber processing and usage

Month/Year	Total VOC Emissions (tons/mo.) From Table 4	Total VOC Emissions (tons/mo.) From Table 5	VOC Emissions during 12 consecutive months	HAP emissions from Table 4	HAP emissions from Table 5	Total combined HAPs per 12 consecutive months

01-0114-04	Tire building	Once the tire components have been assembled, the green tire is sprayed with a lubricant to prevent the tire from sticking to the press. After the tires are sprayed, they are sent to the molding and curing presses where they are given their shape. The green tires are placed in the press and steam is applied. Once the press is opened and the tires are removed, the VOCs and HAPs liberated by the curing are released into several overhead exhaust fans. NSPS
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E5-1. For each green tire spraying operation where only water-based sprays are used:

- (i) Discharge into the atmosphere no more than 1.2 grams (0.0026 pounds) of VOC per tire sprayed with an inside green tire spray for each month; and
- (ii) Discharge into the atmosphere no more than 9.3 grams (0.021 pounds) of VOC per tire sprayed with a water-based outside green tire spray for each month

40 CFR Part 60 subpart BBB §60.542(a)(5)

Compliance Method:

(a). Each owner or operator of a green tire spraying operation using water-based sprays containing less than 1.0 percent by weight of VOC, as specified under §60.543(b)(4), shall maintain records of formulation data or the results of Method 24 analysis conducted to verify the VOC content of the spray in the following log or equivalent.

40 CFR §60.545(f)

Table 7

Month	Name of the spray	VOC content <1% (yes/no)	Method 24/formulation data submitted to TDAPC? Yes/no	Date Method 24 information submitted	Date when discontinued the spray

(b) For water based sprays greater than 1% by weight of VOC, records shall be kept in the following log or equivalent:

Table 8 – VOC EMITTED PER TIRE (For both inside and outside spray)

Month	Name of the tire spray used	Operation (Inside or outside spraying)	Amount Material Used (gallons)	Material Density (lbs/gal)	Mass of VOC used, (pounds) Mo	Number of tires sprayed To	VOC pounds per tire G = Mo/To

For each affected facility that seeks to comply with a g/tire limit without the use of a VOC emission reduction system,

Calculations: Determine the total number of tires sprayed at the affected facility for the month (**To**) by the following procedure:

- (i) For a green tire spraying operation that uses water-based inside green tire sprays, **To** equals the number of green tires that receive an application of water-based inside green tire spray for the month.

- (ii) For a green tire spraying operation that uses water-based outside green tire sprays, **To** equals the number of green tires that receive an application of water-based outside green tire spray for the month.

E5-2. For each green tire spraying operation where only organic solvent-based sprays are used:

Maintain total (uncontrolled) VOC use less than or equal to the levels specified below, depending upon the duration of the compliance period:

- (I) 3,220 kilograms (**7099 pounds**) of VOC per 28 days,
- (II) 3,340 kilograms (**7363 pounds**) of VOC per 29 days,
- (III) 3,450 kilograms (**7606 pounds**) of VOC per 30 days,
- (IV) 3,570 kilograms (**7870 pounds**) of VOC per 31 days, or
- (V) 4,030 kilograms (**8885 pounds**) of VOC per 35 days, or

40 CFR Part 60 subpart BBB §60.542(a)(6)(ii)

Compliance Method: Compliance with the above shall be assured by keeping the log given below or equivalent. The permittee shall also specify the monthly work schedule to determine the compliance period .

Table 9 - VOC EMISSIONS

Month/Year _____					
Compliance period I, II, III...etc	Name of the spray material	Usage for green tires (gallons/specified compliance period)	Material Density (pounds/gallon)	Weight Fraction VOC	VOC emissions (Pounds)

E5-3. (i) The owner or operator shall conduct monthly performance tests if not using water based green tire sprays.

(ii) The owner or operator of each tread end cementing operation and each green tire spraying operation subject to the Rubber Tire NSPS, using only water-based sprays (inside and/or outside) containing less than 1.0 percent, by weight, of VOC is not required to conduct a monthly performance test. In lieu of conducting a monthly performance test, the owner or operator of each green tire spraying operation shall submit formulation data or the results of Method 24 analysis annually to verify the VOC content of each green tire spray material.

(iii) If the spray material formulation changes, formulation data or Method 24 analysis of the new spray shall be conducted to determine the VOC content of the spray and reported within 30 days as required under 40 CFR §60.546(j).

40CFR Part 60 Subpart BBB §60.543(b)(4).

Compliance Method: Compliance shall be assured by submitting Tables 7, 8 and 9 for every compliance period/month to the Technical Secretary at the end of 6 -month period with the semiannual report.

E5-4. Particulate emissions from source 04 shall not exceed **0.02** grains per dry standard cubic foot (**4.67** pounds per hour) and **20.45** tons per 12 consecutive months.

TAPCR 1200-03-7-.04(1)

Compliance Method: Routine maintenance, as required to maintain specified emission limits, shall be performed on the air pollution control device(s). Maintenance records shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than five years.

E5-5. For fee purposes, the actual emissions of volatile organic compounds shall be calculated as indicated in Table 10.

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

Table 10: Monthly VOC emissions

Month	VOC from the Mixers (lbs)	VOC from under tread cementing (lbs)	VOC from tread end cementing (lbs)	VOC from sidewall spraying	VOC from green tire spraying	VOC from curing and molding	Total VOCs from the source	Total VOCs per 12 consecutive months
Total								

E5-6. The VOC and HAP emissions from molding and curing operation shall be calculated by maintaining records of material usage in the table given below or equivalent.

Table 11 - MONTHLY MOLDING AND CURING

									Month/Year
Tires/ month	Pounds of rubber per tire	VOC Emission Factor (0.000337 lbs/lbs of rubber)	VOC emissions (pounds of VOC per month)	Total VOC (Pounds of VOC per 12 consecutive months)	HAP ₁ emission factor (44.2136 % of total VOC)	HAP ₁ emissions (lbs per month)	HAP _n * emission factor (% of total VOC)	HAP _n emissions (lbs per month)	Total HAP (pounds of HAP per 12 consecutive months)

*n: number of each individual HAP emitted

01-0114-05	Two Boilers	Two boilers (95 MMBtu/hr & 92.27 MMBtu/hr) are used to provide the steam for the facility. The primary fuel used is natural gas and the secondary fuel is #2 fuel oil. Both boilers are regulated under NSPS standard 40 CFR Part 60 Subpart Dc. The 95 MMBtu/hr boiler is subject to National Emission Standards for Hazardous Air Pollutant regulation for Industrial, Commercial and Institutional Boilers at Area Sources, Generally Applicable Control Technology (GACT) 40 CFR 63 Subpart JJJJJ (6J) and is defined under Subpart 6J as an “existing” source in the “oil subcategory”. The 92.27 MMBtu/hr boiler meets the definition of a gas-fired boiler as defined in §63.11237 of Subpart 6J and therefore is not subject to this subpart.
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E6-1. Heat input for this source shall not exceed **95** million Btu per hour (MMBtu/hr), on a daily average basis.

This emission limitation is established pursuant to TAPCR 1200-03-06-.01(7) and the agreement letter dated October 13, 2017, from the permittee.

Compliance Method: The two boilers shall not operate simultaneously. Steam from the primary boiler shall keep the second boiler in ready condition. No fuel shall be needed to keep the back-up boiler ready. Compliance with the fuel usage limit in **Condition E6-2** shall assure compliance with the heat input.

E6-2. Total fuel oil usage for this source shall not exceed **2,600,000** gallons of #2 fuel oil and **832,000,000** cubic feet of natural gas during all intervals of 12 consecutive months.

This emission limitation is established pursuant to Rule 1200-03-06-.01(7) of the Tennessee Air Pollution Control Regulations and the agreement letter, dated October 13, 2017, from the permittee. TAPCR1200-03-10-.02(2)(a)

Compliance method: Compliance shall be assured by recordkeeping of fuel usage on a monthly basis for each boiler.

Table 12: MONTHLY FUEL USAGE LOG

Month/ year	Boiler #1 (95 MMBtu/hr)		Boiler #2 (92.27 MMBtu/hr)			Total Natural Gas Usage		Total #2 Fuel Oil Usage	
	Natural Gas Usage (scf)	#2 Fuel Oil Usage (gal.)	Natural Gas Usage (scf)	#2 Fuel Oil Usage (gal.)	Operating Time on Fuel Oil (hours)	scf/mo	scf/12 cons. mo	gal/mo	gal/12 cons. mo

E6-3. Particulate matter emitted from this source shall not exceed **2.24** pounds per hour and **6.07** tons per 12 consecutive months.

This emission limitation is established pursuant to Rule 1200-03-06-.01(7) of the Tennessee Air Pollution Control Regulations and the agreement letter, dated October 13, 2017, from the permittee.

Compliance method: Compliance with the hourly emission limitation of particulate matter shall be assured by complying with **Condition E6-4**. Compliance with the annual limit shall be assured by calculating monthly emissions using emission factors published in Table 1.3-2 and Table 1.4-2 of EPA AP-42, Fifth Edition and the fuel usage identified in **Condition E6-2**. NO_x emissions for the **92.27** MMBtu/hr boiler are based on 30 ppm @ 3% excess oxygen (36.4 lb NO_x/MMscf nat. gas).

E6-4. Only natural gas or # 2 fuel oil shall be used as fuels for this source.

This emission limitation is established pursuant to Rule 1200-03-06-.01(7) and the previous Title V permit 562998.

Compliance Method: Compliance with this condition shall be assured by maintaining the records in **Table 12**.

E6-5. Sulfur dioxide emitted from this source shall not exceed **4.82** pounds per hour and **9.37** tons per 12 consecutive months.

This yearly emission limitation is established pursuant to Rule 1200-03-06-.01(7) of the Tennessee Air Pollution Control Regulations and the agreement letter, dated October 13, 2017, from the permittee.

Compliance Method: Compliance assurance is based on compliance with **Conditions E6-2** and **E6-7**.

E6-6. Nitrogen Oxides emitted from this source shall not exceed **13.57** pounds per hour and **49.41** tons per 12 consecutive months.

This emission limitation is established pursuant to Rule 1200-03-06-.01(7) of the Tennessee Air Pollution Control Regulations and the agreement letter, dated October 13, 2017, from the permittee.

Compliance Method: Compliance with hourly emission limitation of NO_x shall be assured by complying with **Condition E6-4**.

E6-7. Sulfur content of the #2 fuel oil shall not exceed 0.5%.

40 CFR Part 60 Subpart Dc

Compliance Method: The company shall obtain a certification of the fuel sulfur content (by weight) for each shipment of fuel oil from the fuel supplier. The statement shall indicate that sulfur content of the fuel oil was less than 0.5% sulfur by weight.

E6-8(SM1). The permittee shall calculate the actual emissions of nitrogen oxides, particulate matter, sulfur dioxide, and volatile organic compounds using the emission factors from the most recent edition of *AP 42, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*. The emission factors are to be used with the actual amount of fuel combusted for the current accounting period. TAPCR 1200-03-10-.02(2)(a)

Table 12b – Monthly Natural Gas/Fuel Oil Usage and Emissions										
Month/Year:										
			VOC		SO ₂		NO _x		PM	
Fuel Type	Usage	Units	Emission Factor	Emissions (tons)	Emission Factor	Emissions (tons)	Emission Factor	Emissions (tons)	Emission Factor	Emissions (tons)
Natural Gas		Cubic feet								
#2 Fuel Oil		Gallons								
Total:										

E6-9. This facility is considered an area source of HAP emissions. The 95 MMBtu/hr oil fired boiler is considered an existing affected source for National Emission Standards for Hazardous Air Pollutant for Industrial, Commercial and Institutional Boiler Area Sources regulation 40 CFR part 63, subpart JJJJJ.

40 CFR §63.11194(a)(1) and TAPCR 1200-03-09-.03(8)

E6-10. The 95 MMBtu/hr boiler achieved compliance with the work practice or management practice standard February 18, 2014.

40 CFR § 63.11196 and TAPCR 1200-03-09-.03(8)

E6-11. The permittee must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to 40 CFR part 63, subpart JJJJJ that applies to your boiler. A facility that operates under an energy management program established through energy management systems compatible with ISO 50001, that includes the affected units, also satisfies the energy assessment requirement.

Existing oil-fired boilers with heat input capacity greater than 5 MMBtu/hr that do not meet the definition of seasonal boiler or limited-use boiler, are required to conduct an initial tune-up as specified in 40 CFR § 63.11214, and conduct a tune-up of the boiler biennially as specified in 40 CFR § 63.11223.

40 CFR § 63.11201(b) and TAPCR 1200-03-09-.03(8)

The boiler had a one-time energy assessment performed by a qualified energy assessor on February 18, 2014.

E6-12. General requirements

At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

40 CFR § 63.11205 and TAPCR 1200-03-09-.03(8)

E6-13. Initial compliance requirements:

Initial compliance with applicable work practice standards, management practices, or emission reduction measures, was demonstrated February 18, 2014, for the 95 MMBtu/hr boiler.

40 CFR § 63.11210 and TAPCR 1200-03-09-.03(8)

E6-14. Initial compliance with the work practice standard, emission reduction measures, and management practice

If you own or operate an existing or new oil-fired boiler, you must conduct a performance tune-up according to 40 CFR § 63.11223(b) and you must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted a tune-up of the boiler.

A signed certification in the Notification of Compliance Status report was submitted August 19, 2014. An energy assessment of the boiler and its energy use systems was completed according to Table 2 to 40 CFR part 63, subpart JJJJJ.

40 CFR § 63.11214 and TAPCR 1200-03-09-.03(8)

E6-15. Demonstrate continuous compliance with the work practice and management practice standards

(a) For affected sources subject to the work practice standard or the management practices of a tune-up, you must conduct a performance tune-up according to paragraph (b) of this condition and keep records as required in 40 CFR § 63.11225(c) to demonstrate continuous compliance. You must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up.

(b) You must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in paragraphs (b)(1) through (7) of this condition. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.

(1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection.

(2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.

(3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection.

(4) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.

(5) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.

(6) Maintain on-site and submit, if requested by the Technical Secretary, a report containing the information in paragraphs (b)(6)(i) through (iii) of this condition.

- (i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
- (ii) A description of any corrective actions taken as a part of the tune-up of the boiler.
- (iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
- (7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

40 CFR § 63.11223 and TAPCR 1200-03-09-.03(8)

E6-16. Notification, reporting, and recordkeeping, requirements

- (a) You must submit all of the notifications that apply to you by the dates specified in section 40 CFR §63.9. The Initial Notification of Compliance Status report has been submitted for the 95 MMBtu/hr boiler.
- (b) You must prepare, by March 1 of each year, (This date is changed by mutual agreement, to coincide with annual compliance certification period for your Title V permit (October 1 through September 30) per 40 CFR §63.10(a)(5), an annual compliance certification report for the previous calendar year containing the information specified below. For boilers that are subject only to a requirement to conduct a biennial tune-up according to 40 CFR § 63.11223(a) and not subject to emission limits or operating limits, you may prepare only a biennial compliance report as specified in paragraphs (b)(1) and (2) of this condition.
 - (1) Company name and address.
 - (2) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. Your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
 - (i) "This facility complies with the requirements in 40 CFR § 63.11223 to conduct a biennial, of each boiler."
 - (ii) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."
 - (iii) "This facility complies with the requirement in 40 CFR §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."
 - (3) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.
- (c) You must maintain the records specified below:
 - (1) As required in 40 CFR § 63.10(b)(2)(xiv), you must keep a copy of each notification and report that you submitted to comply with 40 CFR part 63 subpart JJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.
 - (2) You must keep records to document conformance with the work practices, emission reduction measures, and management practices required by 40 CFR § 63.11214 and § 63.11223 as specified in paragraphs (c)(2)(i) through (ii) of this condition.
 - (i) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
 - (ii) For each boiler required to conduct an energy assessment, you must keep a copy of the energy assessment report.
 - (3) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.
 - (4) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR § 63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.
- (d) Your records must be in a form suitable and readily available for expeditious review. You must keep each record for 5 years following the date of each recorded action. You must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. You may keep the records off site for the remaining 3 years.

(e) If you have switched fuels or made a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within subpart JJJJJ, in the boiler becoming subject to subpart JJJJJ, or in the boiler switching out of subpart JJJJJ due to a change to 100 percent natural gas, or you have taken a permit limit that resulted in you being subject to subpart JJJJJ, you must provide notice of the date upon which you switched fuels, made the physical change, or took a permit limit within 30 days of the change. The notification must identify:

- (1) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that have switched fuels, were physically changed, or took a permit limit, and the date of the notice.
- (2) The date upon which the fuel switch, physical change, or permit limit occurred.

40 CFR § 63.11225 and TAPCR 1200-03-09-.03(8)

E6-17. The permittee shall comply with the applicable General Provisions to 40 CFR Part 63 Subpart JJJJJ as summarized in §40 CFR 63.11235, Table 8, for the **95** MMBtu/hr boiler. TAPCR 1200-03-09-.03(8)

E6-18. The use of #2 fuel oil in the 92.27 MMBtu boiler will be limited to periods of gas curtailment, gas supply, interruption, startups, or for periodic testing, maintenance, or operator training on liquid fuel. Periodic testing, maintenance, or operator training on liquid fuel shall not exceed a combined total of 48 hours during and calendar year.

This limitation is established pursuant to Rule 1200-03-06-.01(7) of the Tennessee Air Pollution Control Regulations and the agreement letter dated October 13, 2017, from the permittee.

Compliance Method: Compliance with this condition shall be assured by maintaining the records in **Table 12**.

01-0114-07	Raw Material Handling	Carbon black is brought in by truck or rail car and offloaded to the carbon black transporter with indoor baghouse control (650 cfm). From the transporter, carbon black is conveyed to raw material storage silos with bin vents. Carbon black is also unloaded from bulk bags in to an indoor hopper with baghouse control (600 cfm) and is conveyed to the carbon black transporter. From the storage silos, carbon black is pneumatically transferred to the day bins and then to mixing.
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E7-1. Particulate matter emissions from this source shall not exceed **0.25** gr/dscf (**2.67** pounds per hour).

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

Compliance Method: Routine maintenance, as required to maintain specified emission limits, shall be performed on the air pollution control device(s). Maintenance records shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than five years.

01-0114-08	Rubber Mixing	A conveyor feeds the raw materials into two Banbury mixers, Mixer #1 and Mixer #2. Carbon black, powders, pellets and oils are fed into the Banbury and mixed. VOCs, HAPs and PM are released during the feeding and mixing process. The particulates are controlled using a dust collector connected to each mixer.
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E8-1(MM2). Particulate emissions from rubber mixing shall be limited to **0.02** grains per dry standard cubic foot. (**5.26** pounds per hour)

This emission limitation is established pursuant to TAPCR 1200-03-07-.01(5) and the agreement letter dated August 3, 2004, from the permittee.

Compliance Method: For Rubber Mixing Dust Collector (Mixer #1) and Carbon Black Dust Collector (Mixer #2) the permittee shall follow the submitted CAM plan (Attachment 2):

Indicator	Visible Emissions	Pressure Drop
Measurement Approach	Visible Emissions from the baghouse exhaust will be monitored daily using EPA Reference Method 22-like procedures. (visible/no visible)	Pressure Drop across each dust collector or baghouse is measured with a differential pressure gauge
II. Indicator Range	An excursion is defined as the presence of visible emissions. Excursions trigger an inspection, corrective action, and reporting requirement.	Minimum pressure across the Mixer #1 dust collector and the Mixer #2 Carbon Black dust collector is 0.5 inches of water An excursion is defined as a pressure drop value expressed in inches of water, out of range established for each dust collector. Excursions trigger an inspection, corrective action and a reporting requirement.
QIP Threshold	None selected	None selected
III. Performance Criteria		
A. Data Representativeness	Measurements are made at the emission point (baghouse exhaust)	Pressure taps are located at the baghouse inlets and outlet. The gauges have a minimum accuracy of 0.25 in H ₂ O
B. Verification of operational Status	Minimum 95% of reading observed during monitoring period.	The gauges must operate at least 95% of the time the source is operating. Records must be kept to show compliance with this requirement.
C. QA/QC Practices and Criteria	The observer will be familiar with EPA Method 22.	The pressure gauges are calibrated annually. Pressure taps are checked for plugging daily and entered into a form or a checklist.
D. Monitoring frequency	Daily	Pressure drop is monitored continuously but recorded once per day.
Data Collection Procedure	The VE observation is documented	Pressure drops are manually recorded once per day for each baghouse during operation.
Averaging period	n/a	n/a

- E8-2.** Volatile Organic Compound emissions and hazardous air pollutants from this source shall be tracked by keeping records in the following format or equivalent.

TAPCR 1200-03-10

Table 13

Monthly Rubber Mixed and VOC/HAP Emissions for Rubber Mixing					
Month/Year:					
Rubber Type	Amt. Of Rubber Mixed (lbs)	VOC Emission Factor (lb VOC/ lb rubber)	VOC Emissions (tons)	HAP Emission factor lb HAP /lb rubber	HAP Emissions (tons)
Fabric Rubber		0.000136		5.91E-05	
Bead Rubber		0.000215		4.19E-05	
Tread Rubber		0.0000984		4.87E-05	

END OF MINOR MODIFICATION #2 TO PERMIT NUMBER: 572478

ATTACHMENT 1

**OPACITY MATRIX DECISION TREE for
VISIBLE EMISSION EVALUATION METHOD 9
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(1)(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.

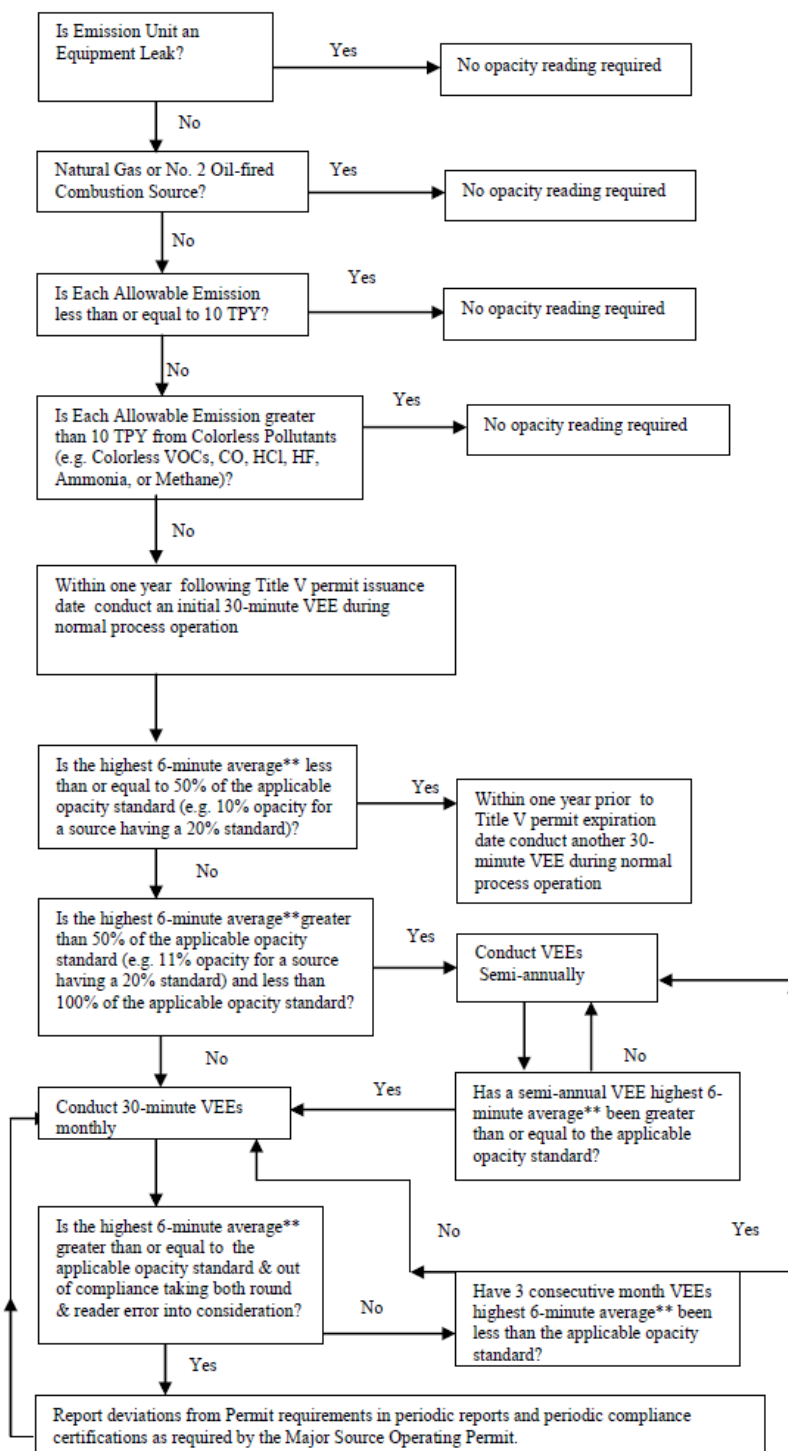
Reader Error
 EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards:
 The TAPCD guidance is to declare non-compliance when the highest six-minute average** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

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

(MM2) CAM Plan for Source 08

Submitted Electronically to: APC.KnoxEFO@tn.gov,
Cc: Air.Pollution.Control@tn.gov

November 12, 2024

Ms. Michelle Walker Owenby, Technical Secretary
Tennessee Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, Tennessee 37243

Re: Minor Modification Request
Source 01-0114-08: Rubber Mixing - CAM Plan Pressure Drop Range
The Carlstar Group – Clinton, Tennessee
Title V Operating Permit No. 572478, ESRN: 01-0114

Dear Ms. Owenby,

The Carlstar Group (Carlstar) owns and operates a tire manufacturing facility located in Clinton, Tennessee. Carlstar is submitting this minor modification request to update the pressure drop indicator range in the facility's Compliance Assurance Monitoring (CAM) plan for the Mixer #1 and Mixer #2 dust collectors. The CAM plan is contained in Condition E8-1 of the facility's Title V Operating Permit (Permit No. 572478).

The Mixer #1 and Mixer #2 dust collectors are seasoned; therefore, the operating range included in Condition 8-1 of the Title V Operating Permit No. 572478 is no longer appropriate. Overcleaning the cartridges to reduce the pressure drop below manufacturer's recommendations could result in higher emissions, shorter cartridge life, and higher energy consumption. Carlstar included updated CAM plans in the facility's Title V Operating Permit renewal application, submitted on December 22, 2022. To date, Carlstar has not received an updated Title V Operating Permit. As such, Carlstar is submitting this minor modification application to update the pressure drop range contained in Condition E8-1 of Title V Operating Permit No. 572478 to a minimum of 1.0 inches of water and a maximum of 6.0 inches of water.

Carlstar plans to make the changes outlined above to the Title V Operating Permit immediately pursuant to TAPCR 1200-3-9-.02(11)(f)5.(ii). This minor modification request includes the required Title V application forms and suggested amended permit condition (CAM plan) with compliance methods.

Title V Minor Modification Procedure

Carlstar has determined that this permit modification request meets the minor modification requirements contained in TAPCR 1200-3-9-.02(11)(f)5.

Submitted Electronically to: APC.KnoxEFO@tn.gov,
Cc: Air.Pollution.Control@tn.gov

December 27, 2024

Ms. Michelle Walker Owenby, Technical Secretary
Tennessee Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, Tennessee 37243

Re: Minor Modification Request
Source 01-0114-08: Rubber Mixing - CAM Plan Pressure Drop Range
The Carlstar Group – Clinton, Tennessee
Title V Operating Permit No. 572478, ESRN: 01-0114

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Carlstar submitted a minor modification application to amend the pressure drop range in Condition E8-1 of Title V Operating Permit No. 572478 on November 18, 2024. After discussions with TDEC, Carlstar would like to submit this minor modification application to update the pressure drop requirement contained in the facility's CAM plan to a minimum of 0.5 inches of water.

Carlstar plans to make the changes outlined above to the Title V Operating Permit immediately pursuant to TAPCR 1200-3-9-.02(11)(f)5.(ii). This minor modification request includes the required Title V application forms and suggested amended permit condition (CAM plan) with compliance methods.

Title V Minor Modification Procedure

Carlstar has determined that this permit modification request meets the minor modification requirements contained in TAPCR 1200-3-9-.02(11)(f)5.

Indicator	Visible Emissions	Pressure Drop
Measurement Approach	Visible Emissions from the dust collector exhaust will be monitored daily using EPA Reference Method 22-like procedures. (visible/no visible)	Pressure Drop across each dust collector is measured with a differential pressure gauge.
II. Indicator Range	An excursion is defined as the presence of visible emissions. Excursions trigger an inspection, corrective action, and reporting requirement.	Minimum pressure across the Mixer #1 dust collector and the Mixer #2 dust collector is 0.5 inches of water. An excursion is defined as a pressure drop value expressed in inches of water, out of range established for each dust collector. Excursions trigger an inspection, corrective action and a reporting requirement.
QIP Threshold	None selected	None selected
III. Performance Criteria		
A. Data Representativeness	Measurements are made at the emission point (dust collector exhaust)	Pressure taps are located at the dust collector inlets and outlet. The gauges have a minimum accuracy of 0.25 in H ₂ O
B. Verification of operational Status	Minimum 95% of reading observed during monitoring period.	The gauges must operate at least 95% of the time the source is operating. Records must be kept to show compliance with this requirement.
C. QA/QC Practices and Criteria	The observer will be familiar with EPA Method 22.	The pressure gauges are calibrated annually. Pressure taps are checked for plugging daily and entered into a form or a checklist.
D. Monitoring frequency	Daily	Pressure drop is monitored continuously but recorded once per day.
Data Collection Procedure	The VE observation is documented	Pressure drops are manually recorded once per day for each dust collector during operation.
Averaging period	n/a	n/a