



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

**PERMIT TO CONSTRUCT / MODIFY AND OPERATE AIR CONTAMINANT SOURCE(S)**

**Permit Number:** 081731  
**Facility (Permittee):** IMI Tennessee, LLC dba imi TN, LLC - Dickson  
**Facility ID:** 22-0106  
**Facility Address:** 1550 Old Columbia Road, Dickson  
Dickson County  
**Facility Classification:** True Minor  
**Federal Requirements:** None  
**Facility Description:** Concrete Batch Plant Operation

Permit 081731 consisting of 17 pages, is hereby issued November 29, 2023, pursuant to the Tennessee Air Quality Act and by the Technical Secretary, Tennessee Air Pollution Control Board, Department of Environment and Conservation. This permit expires on March 1, 2033. The holder of this permit shall comply with the conditions contained in this permit as well as all applicable provisions of the Tennessee Air Pollution Control Regulations (TAPCR).

Michelle W. Owenby  
Technical Secretary  
Tennessee Air Pollution Control Board

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.

**Section I – Sources Included in this Permit**

FACILITY DESCRIPTION			
Source Number	Source Description	Status	Control Device/Equipment
01	Concrete Batch Operation with Two Silos	Modified	Baghouse(s)

**Section II – Permit Record**

Permit Type	Description of Permit Action	Issue Date
Initial	Initial Combined Construction Operating Permit Issuance	November 29, 2023

**Section III - General Permit Conditions**

**G1. Responsible Person**

The application that was utilized in the preparation of this permit is dated August 25, 2023, and is signed by Art Fisher, Environmental Manager, the Responsible Person for the permittee. The Responsible Person may be the owner, president, vice-president, general partner, plant manager, environmental/health/safety coordinator, or other person that is able to represent and bind the facility in environmental permitting affairs. If this Responsible Person terminates their employment or is assigned different duties and is no longer the person to represent and bind the permittee in environmental permitting affairs, the new Responsible Person for the permittee shall notify the Technical Secretary of the change in writing. The Notification shall include the name and title of the new Responsible Person assigned by the permittee to represent and bind the permittee in environmental permitting affairs, and the date the new Responsible Person was assigned these duties.

Should a change in the Responsible Person occur, the new Responsible Person must submit the Notification provided in Appendix 1 of this permit no later than 30 days after being assigned as the Responsible Person. A separate notification shall be submitted for each subsequent change in Responsible Person.

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

**G2. Application and Agreement Letters**

This source shall operate in accordance with the terms of this permit, the information submitted in the approved permit application(s) referenced in **Condition G1**, and any documented agreements made with the Technical Secretary.

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

**G3. Submittals**

Unless otherwise specified within this permit, the permittee shall submit, preferably via email and in Adobe Portable Document format (PDF), all applicable plans, checklists, certifications, notifications, test protocols, reports, and applications to the attention of the following Division Programs at the email addresses indicated in the table below:

Permitting Program	Compliance Validation Program	Field Services Program
<ul style="list-style-type: none"> <li>• Notifications</li> <li>• Startup certifications</li> <li>• Applications</li> <li>• NSPS reports</li> <li>• MACT/GACT/NESHAP reports</li> <li>• Emission Statements</li> </ul>	<ul style="list-style-type: none"> <li>• Test protocols</li> <li>• Emission test reports</li> <li>• Visible emission evaluation reports</li> </ul>	<ul style="list-style-type: none"> <li>• Semiannual reports</li> <li>• Annual compliance certifications/status reports</li> </ul>
Division of Air Pollution Control William R. Snodgrass TN Tower, 15 <sup>th</sup> Floor 312 Rosa L. Parks Avenue Nashville, TN 37243 <a href="mailto:Air.Pollution.Control@tn.gov">Air.Pollution.Control@tn.gov</a>		Nashville Environmental Field Office Division of Air Pollution Control 711 R.S. Gass Boulevard Nashville, TN 37216 <a href="mailto:APC.NashEFO@tn.gov">APC.NashEFO@tn.gov</a>

The permittee shall submit the information identified above as requested in this permit. In lieu of submitting this information to the email addresses above, the permittee may submit the information to the attention of the respective Division Programs at the mailing addresses listed above.

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

**G4. Notification of changes**

The permittee shall notify the Technical Secretary for any of the following changes to a permitted air contaminant source which would not be a modification requiring a new construction permit:

- change in air pollution control equipment that does not result in an increase or otherwise meet the definition of a modification
- change in stack height or diameter
- change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

The permittee must submit the Notification provided in Appendix 2 of this permit 30 days before the change is commenced.

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

**G5. Permit Transference**

A. This permit is not transferable from one air contaminant source to another air contaminant source or from one location to another location. The permittee must submit a construction permit application for a new source to the Permitting Program not less than 90 days prior to the estimated starting date of these events. If the new source will be subject to major New Source Review, the application must be submitted not less than 120 days in advance of the estimated starting date of these events.

TAPCR 1200-03-09-.03(6)(b) and 1200-03-09-.01(1)(b)

- B. In the event an ownership change occurs at this facility, the new owner must submit the notification provided in Appendix 3 of this permit. The written notification must be submitted by the new owner to the Permitting Program no later than 30 days after the ownership change occurs. If the change in ownership results in a change in Responsible Person for the facility, notification of the change in Responsible Person must also be submitted, as specified in **Condition G1**.

TAPCR 1200-03-09-.03(6)(a) and (b)

**G6. Operating Permit Application Submittal**

- A. The permittee shall apply for an operating permit renewal not less than 60 days prior to the permit's expiration date.

TAPCR 1200-03-09-.02(3)(a)

- B. Operation of each air contaminant source shall be in accordance with the provisions and stipulations set forth in this permit, all provisions of the Tennessee Division of Air Pollution Control Regulations, and all provisions of the Tennessee Air Quality Act.

TAPCR 1200-03-09-.02(6)

**G7. Startup Certification for New or Modified Source(s)**

*Not Applicable*

**G8. Fees**

The air contaminant source(s) identified in this permit shall comply with the requirements for payment of applicable annual emission fees to the Tennessee Division of Air Pollution Control based on the Administrative Fees Schedule I provided in Appendix 5 of this permit. The fee must be paid to the Division in full by the first day of the month that the fee is due (determined from Appendix 5). (Note: not all facilities are required to pay annual emission fees)

TAPCR 1200-03-26-.02

**G9. General Recordkeeping Requirements**

- A. All recordkeeping requirements for all data required to be recorded shall follow the following schedules:

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

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

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

## G10. Routine Maintenance Requirements

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

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

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

## G11. Visible and Fugitive Emissions

A. Unless otherwise specified, visible emissions from this facility shall not exhibit greater than 20% opacity, except for one six-minute period in any one hour period, and for no more than four six-minute periods in any 24 hour period. A stack is defined as any chimney, flue, conduit, exhaust, vent, or opening of any kind whatsoever, capable of, or used for, the emission of air contaminants.

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

**Compliance Method:** When required to demonstrate compliance, visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

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

- (a) 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;
- (b) Application of asphalt, water, or suitable chemicals on dirt roads, material stock piles, and other surfaces which can create airborne dusts;
- (c) Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

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

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

**Compliance Method:** Fugitive emissions shall be determined by Tennessee Visible Emissions Evaluation Method 4 as adopted by the Tennessee Air Pollution Control Board on April 16, 1986.

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

TAPCR 1200-03-08-.03

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

**G12. Facility-wide Limitations**

*Not Applicable*

**G13. NSPS/NESHAP/MACT/GACT Standards**

*Not Applicable*

**G14. VOC and NO<sub>x</sub> Emission Statement**

*Not Applicable*

**G15. Permit Supersedes Statement**

This permit supersedes all previously issued permits for this/these source(s).

**G16. Source Testing Requirements**

*Not Applicable*

**Section IV – Federal and/or State Only Requirements**

*Not Applicable*

**Section V - Source Specific Permit Conditions**

Source No	Source Description
01	Concrete Batch Operation with Two Silos

**S1-1. Input Limitation(s) or Statement(s) of Design**

*Not Applicable*

**S1-2. Production Limitation(s)**

The production rate of this source shall not exceed **100,000** cubic yards of concrete per calendar year. Should the permittee need to modify the source(s) in a manner that increases the production capacity, a construction permit shall be applied for and received in accordance with TAPCR 1200-03-09-.01 prior to making the change.

TAPCR 1200-03-09-.03(8), 1200-03-10-.02(2)(a), and the application dated August 25, 2023.

**Compliance Method:** The permittee shall maintain a log of the actual daily and monthly production that readily provides the information required in the tables in Appendix 8, or in an alternative format which provides the same information. The logs shall be retained in accordance with **Condition G9**.

**S1-3. Operating Hour Limitation(s)**

*Not Applicable*

**S1-4. Emission Limitation(s)**

A. Particulate Matter (PM) emitted from the stack emission points, listed in the table below shall not exceed 0.25 grains per dry standard cubic foot of exhaust gases (gr/dscf).

Stack Emission Points	*PM Emission Control Device(s)	Flow Rate (ft <sup>3</sup> /min)	PM Allowable Emissions (gr/dscf)	PM Allowable Emissions (lbs/hr)
Split Silo 1 – Cement (two emission points)	CFF	2250 each	0.25	9.64
Silo 2- Flyash	CFF	2250	0.25	4.82
Central Dust Collector serving weigh batcher and truck loadout	CFF	8000	0.25	17.14
<b>Total Allowable PM</b>				<b>31.60</b>

Notes for Table: \* CFF for cartridge fabric filter

TAPCR 1200-03-07-.04(2), 1200-03-09-.03(8), and 1200-03-10-.02(2)(a) and the application dated August 25, 2023, from the permittee.

**Compliance Method:** Compliance with this emission limitation is assured by compliance with **Condition G10** and the use of AP-42, Chapter 11, Section 12, emission factors, Supplement to 5<sup>th</sup> Ed, 6/06.

The permittee shall operate and maintain control device(s) for the concrete batch plant. The concrete batch plant shall not operate unless the control device(s) are in operation. The permittee shall perform and record weekly visual inspections of the exterior of the control device(s) and the control device(s) ductwork, including the control device(s) exhaust. The permittee shall initiate, as well as record, corrective action within 24 hours and complete, as well as record, corrective action as expeditiously as practical if the permittee finds that an abrasion hole and/or emissions problem and/or plugging problem has developed during an inspection of the baghouse(s). Identification of an abrasion hole and/or emissions problem and/or plugging problem and corrective action(s) shall be noted in the weekly inspection records. Inspection records shall be kept (see example record in Appendix 9) and shall also include the initials of the person performing the inspection(s) and corrective action(s), along with the date, time, and any relevant comments. These records shall be retained in accordance with **Condition G9**.

B. Fugitive Particulate Matter (PM) emitted from the source shall not exceed the following limits on an average daily basis:

For the aggregate and sand handling operations, which include ground storage, transfer to conveyor, and transfer from conveyor to elevated storage, fugitive PM emissions shall not exceed **2.13** pound per hour.

TAPCR 1200-03-08-.01, 1200-03-08-.03, and 1200-03-09-.03(8)

**Compliance Method:** Compliance with this emission limitation is assured by compliance with **Conditions G10, G11B** and the use of emission factors from AP-42, Chapter 11, Section 12, Table 11.12-5, Emission Factors for Concrete Batching, Supplement to 5<sup>th</sup> Ed, 06/06.

**S1-5. Source-Specific Visible Emissions Limitation(s)**

*Not Applicable*

(end of conditions)

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The permit application gives the location of this source as 36.040120 Latitude and -87.339568 Longitude.



**Appendix 1: Notification of Change in Responsible Person**

**Facility (Permittee)** IMI Tennessee, LLC dba imi TN, LLC - Dickson

**Facility ID** 22-0106

**Former Responsible Person:**  
 \_\_\_\_\_  
 Name Title

**New Responsible Person:**  
 \_\_\_\_\_  
 Name Title

\_\_\_\_\_  
 Email

\_\_\_\_\_  
 Mailing Address

\_\_\_\_\_  
 Phone (office) Phone (cell)

**Date New Responsible Person was assigned this duty:** \_\_\_\_\_

As the Responsible Person of the above-mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

**Appendix 2: Notification of Changes**

**Facility (Permittee)** IMI Tennessee, LLC dba imi TN, LLC - Dickson

**Facility ID** 22-0106

**Source Number:** \_\_\_\_\_

	Control Equipment	Stack Height (Feet)	Stack Diameter (Feet)	Exit Velocity (Feet/Second)	Exit Temperature (°F)
Current					
Proposed					
Current					
Proposed					
Current					
Proposed					

Comments:

As the Responsible Person of the above-mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

**Appendix 3: Notification of Ownership Change**

**Facility (Permittee)** IMI Tennessee, LLC dba imi TN, LLC - Dickson (Previous Owner)

**Facility ID** 22-0106

**Facility (Permittee):** \_\_\_\_\_ (New Owner) \_\_\_\_\_  
Date of Ownership Change

**Secretary of State Control Number:** \_\_\_\_\_ [as registered with the TN Secretary of State (SOS)]

<b>Responsible Person/Authorized Contact</b>	Email Address
Mailing Address	Phone with area code
<b>Principal Technical Contact</b>	Email Address
Mailing Address	Phone with area code
<b>Billing Contact</b>	Email Address
Mailing Address	Phone with area code

As the responsible person for the new owner or operator of the above-mentioned facility (permittee):

- I agree to not make any changes to the stationary source(s) that meet the definition of modification as defined in Division 1200-03 or Division 0400-30<sup>1</sup>, and
- I agree to comply with the conditions contained in **the permits listed below**, Division 1200-03 and Division 0400-30 of the Tennessee Air Pollution Control Regulations, the Tennessee Air Quality Act, and any documented agreements made by the previous owner to the Technical Secretary.

List all active permits issued to the facility for which the owner wishes to assume ownership:

Signature		Date
Signer's name (print)	Title	Phone (with area code)

<sup>1</sup> Appropriate application forms must be submitted prior to modification of the stationary source(s).

## **Appendix 4: Startup Certification**

Not Applicable

**Appendix 5: Fees**

All minor and conditional major source annual emission fees are due and payable to the Division in full according to SCHEDULE I below<sup>2</sup> unless otherwise specified in TAPCR 1200-03-26-.02(6)(c). The county that a source is located in determines when the minor source annual emission fee is due. Fees are due the first day of the month listed. If a source is located on contiguous property in more than one county, the county appearing earliest in the calendar year shall be used to determine the due date of the annual emission fee.

SCHEDULE I  
 Month the Annual Emissions Fee is Due (Accounting Period)  
 Counties in the Monthly Grouping

January	Anderson, Bedford, Benton, Bledsoe, Blount, Bradley and Campbell
February	Cannon, Carroll, Carter, Cheatham, Chester, Claiborne, Clay and Cocke
March	Coffee, Crockett, Cumberland, Davidson, Decatur, DeKalb, Dickson, Dyer and Fayette
April	Fentress, Franklin, Gibson, Giles, Grainger, Greene and Grundy
May	Hamblen, Hamilton, Hancock, Hardeman, Hardin, Hawkins, Haywood and Henderson
June	Henry, Hickman, Houston, Humphreys, Jackson, Jefferson, Johnson, Knox, Lake, Lauderdale, Lawrence and Lewis
July	Lincoln, Loudon, McMinn, McNairy, Macon and Madison
August	Marion, Marshall, Maury, Meigs, Monroe, Montgomery, Moore and Morgan
September	Obion, Overton, Perry, Pickett, Polk, Putnam and Rhea
October	Roane, Robertson, Rutherford, Scott, Sequatchie, Sevier, and Shelby
November	Smith, Stewart, Sullivan, Sumner, Tipton, Trousdale, Unicoi and Union
December	Van Buren, Warren, Washington, Wayne, Weakley, White, Williamson and Wilson

<sup>2</sup> Note that some sources with allowable emissions below specific thresholds are not subject to the requirement to pay annual emission fees. Contact the Emission Inventory Program at [apc.inventory@tn.gov](mailto:apc.inventory@tn.gov) if you have any questions.

## **Appendix 6: Emission Statement for VOC and NO<sub>x</sub>**

*Not Applicable*

## **Appendix 7: Agreement Letters**

*Not Applicable*

**Appendix 8: Example Logs**

**Daily Concrete Production for Source 22-0106-01**

Date	Production (cubic yards)	Date	Production (cubic yards)	Date	Production (cubic yards)
1		12		23	
2		13		24	
3		14		25	
4		15		26	
5		16		27	
6		17		28	
7		18		29	
8		19		30	
9		20		31	
10		21			
11		22			
<b>Total for the month of _____, 20__</b>					

**Monthly Concrete Production for Source 22-0106-01**

Month	Production (cubic yards)	Month	Production (cubic yards)	Month	Production (cubic yards)
January		May		September	
February		June		October	
March		July		November	
April		August		December	
<b>Total for calendar year 20__</b>					



