



**STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
DIVISION OF AIR POLLUTION CONTROL  
William R. Snodgrass Tennessee Tower, 15<sup>th</sup> Floor  
312 Rosa L. Parks Avenue, Nashville, TN 37243  
615-532-0554**

**December 14, 2023**

TN Department of Safety and Homeland Security  
Mr. Jeff Gray  
312 Rosa L Parks Ave, 25<sup>th</sup> Floor  
Nashville, TN 37243

Re: Facility ID # 28-0130  
**Permit Number: 069546P**

Dear Mr. Gray or responsible official:

The Division of Air Pollution Control is completing file reviews to identify permits approaching their expiration date. It has come to our attention that permit number **069546P** is due to expire **April 1, 2024**.

Pursuant to Tennessee Comprehensive Rules and Regulations 1200-03-09.02(3)(a), an application for an operating permit shall be filed with the Technical Secretary not less than sixty (60) days prior to the expiration of an existing operating permit. Therefore, the deadline to submit a Notice of Intent or renewal application for all of your emergency generators is **February 1, 2024**.

The Division recently implemented Permit-by-Rule (PBR) for stationary internal combustion engines/generators. Rather than applying for a site-specific permit, owners can now instead opt to be covered by PBR. PBR is not a permit, but it does satisfy permitting requirements. This option allows owners of such facilities to submit a Notice of Intent for authorization under Permit-by-Rule, and receive a Notice of Authorization (NOA) to construct, modify, or operate their stationary emergency engine. **The Notice of Authorization will take the place of the permit that was previously written specifically for your facility.** The advantage of using PBR is that the NOA is valid for the life of the source without having to worry about periodic renewals, and there are currently no associated application fees or annual emission fee assessments.

The Notice of Intent APC 202 form (CN-1514), may be submitted via email to [Air.Pollution.Control@tn.gov](mailto:Air.Pollution.Control@tn.gov). The submittals must be signed, dated, and in PDF format. Please

include your Facility ID as well. If preferred, paper documents can be mailed to the Technical Secretary at the address included on the form. An APC 202 Notice of Intent form is enclosed for your convenience, and can also be downloaded from the Division's website by visiting:

<https://www.tn.gov/environment/sbeap/pbr.html>

Additional information for stationary internal combustion engines/generators can be found by visiting:

<https://www.tn.gov/environment/sbeap/engines.html>

Note: In addition to the Permit-by-Rule or permitting requirements of NSPS 4I or 4J, or NESHAP 4Z, all Stationary Emergency Internal Combustion Engines must also meet the requirements of Tennessee Comprehensive Rules and Regulations 1200-03-09.

If assistance is needed, or if you prefer the option to submit a renewal application, the Small Business Environmental Assistance Program (SBEAP) is a free, confidential, technical program within TDEC that can help. This program is able to assist with completing applications including calculations as well as any other environmental questions that a small business may have. The SBEAP can be contacted at **800-734-3619** or by email at [BGSBEAP@tn.gov](mailto:BGSBEAP@tn.gov).

Sincerely,



James P. Johnston, PE  
Deputy Director  
Permitting & Regulatory Development

Tell us how we're doing. <http://tn.gov/environment/article/contact-tdec-customer-service-form>