



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

PERMIT TO CONSTRUCT / MODIFY AIR CONTAMINANT SOURCE(S)

Permit Number: 981829

Facility (Permittee): Magna Structures Tennessee LLC

Facility ID: 38-0177

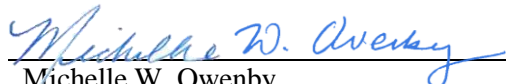
Facility Address: 2676 Keeling Road, Stanton
Haywood County

Facility Classification: True Minor

Federal Requirements: 40 CFR 60 Subpart Dc
40 CFR 60 Subpart IIII
40 CFR 60 Subpart JJJJ
40 CFR 63 Subpart WWWW

Facility Description: Automobile Frame and Battery Enclosure Manufacturing Facility

Permit 981829, consisting of 25 pages is hereby issued February 8, 2024, 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 February 7, 2026. 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	One Electrocoating (E-Coat) Line	New	None
02	Two 12.5 MMBtu/hr Natural Gas-Fired Boilers	New	None

Section II – Permit Record

Permit Type	Description of Permit Action	Issue Date
Initial	Initial construction permit issuance	February 7, 2024

Section III - General Permit Conditions

G1. Responsible Person

The application that was utilized in the preparation of this construction permit is dated October 2, 2023, and is signed by Christopher Hinman, General 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 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"> • Notifications • Startup certifications • Applications • NSPS reports • MACT/GACT/NESHAP reports • Emission statements • Construction permit extension requests 	<ul style="list-style-type: none"> • Test protocols • Emission test reports • Visible emission evaluation reports 	<ul style="list-style-type: none"> • Semiannual reports • Annual compliance certifications/status reports
Division of Air Pollution Control William R. Snodgrass TN Tower, 15 th Floor 312 Rosa L. Parks Avenue Nashville, TN 37243 Air.Pollution.Control@tn.gov		Jackson Environmental Field Office Division of Air Pollution Control 1625 Hollywood Drive Jackson, TN 38305 APC.JackEFO@tn.gov

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

The permittee shall apply for an operating permit within 30 days of initial startup of the first new or modified emission source.

TAPCR 1200-03-09-.02(1) and 1200-03-09-.02(3)

G7. Temporary Operating Permit

- A. This construction permit shall serve as a temporary operating permit from the date of issuance, until the Technical Secretary issues an operating permit provided the permittee submits an operating permit application within the timeframe specified in **Condition G6**.

TAPCR 1200-03-09-.02(1), 1200-03-09-.02(2) and 1200-03-09-.02(3)(b)1

- B. If construction of the air contaminant source(s) cannot be completed and/or an operating permit application cannot be filed with the Technical Secretary by the expiration date of this permit, the permittee must submit a permit extension request 30 days prior to permit expiration.

TAPCR 1200-03-09-.02(1) and 1200-03-09-.02(3)

G8. Startup Certification for New or Modified Source(s)

The startup certification provided in Appendix 4 shall be submitted to the Permitting Program once an air contaminant source has started up. Startup of the air contaminant source shall be the date the new or modified air contaminant source began operation for the production of product for sale, use as raw materials, or steam or heat production under the terms of this permit. A separate startup certification must be submitted for each air contaminant source included in this permit.

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

Compliance Method: The startup certification provided in Appendix 4 shall be submitted no later than 30 days after each air contaminant source has begun startup.

G9. 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

G10. 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 thirty 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 or as required in this permit. 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)

G11. 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.

G12. 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 stockpiles, 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: When required to demonstrate compliance, 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.

G13. Facility-wide Limitations

Not Applicable

G14. NSPS/NESHAP/MACT/GACT Standards

The following source(s) are subject to and shall comply with all applicable requirements of each NSPS/NESHAP/MACT/GACT standard as indicated in the table below, including the General Provisions identified in Appendix 9 and Appendix 10.

Source Number	NESHAP/MACT/GACT	NSPS
01	40 CFR 63 Subpart WWWW	Not Applicable
02	Not Applicable	40 CFR 60 Subpart Dc

TAPCR 1200-03-09-.03(8), 0400-30-38-.01, and 0400-30-39

Compliance Method: Compliance methods are provided in the conditions in **Section V** of this permit.

G15. VOC and NO_x Emission Statement

Not Applicable

G16. Permit Supersedes Statement

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

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

G17. Source Testing Requirements

Not Applicable

G18. Hazardous Air Pollutant (HAP) Emissions

At the time of application, the potential to emit hazardous air pollutants from this facility was less than the major source applicability thresholds of 10 tons per year of a single hazardous air pollutant and less than 25 tons per year of a combination of hazardous air pollutants. The permittee must apply for and receive a construction permit in accordance with the procedures in Chapter 1200-03-09 of the Tennessee Air Pollution Control Regulations (TAPCR) prior to making any changes such that the potential to emit hazardous air pollutants from the facility will exceed these thresholds.

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

G19. VOC and HAP Recordkeeping

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

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

Compliance Method: Purchase orders and/or invoices for all VOC- and HAP-containing materials, along with current SDS, must be maintained and kept available for inspection by the Technical Secretary or a Division representative. The SDS must explicitly list the VOC and HAP content by weight for all VOC- and HAP-containing materials. If SDS are not available with this information, vendor formulation data containing the required information for those materials must also be maintained. These records must be retained in accordance with **Condition G10**. Scanned documents (maintained electronically) may be used to fulfill this requirement.

Section IV – Federal and/or State Only Requirements

See Section V – Source Specific Permit Conditions

Section V - Source Specific Permit Conditions

Source Number	Source Description
01	<p>E-Coat Line: One Electrocoating (E-Coat) Line, consisting of several pretreatment tanks, one E-Coat dip tank, one rinse tank, and two 21.0 MMBtu/hr natural gas-fired curing ovens. This E-coat line will coat automobile frames and battery enclosures.</p> <p>This source is subject to 40 CFR 63 Subpart WWWW.</p>

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

- A. The stated design heat input rate of each curing oven is 21.0 million British thermal units per hour (MMBtu/hr). Should the permittee need to modify the ovens in a manner that increases the stated design heat input rate 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-.01(1)(d) and the application dated October 2, 2023

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

- B. Only natural gas shall be used as fuel for the ovens. The ovens are only capable of burning this fuel. Should the permittee need to modify the source to allow the use of a fuel other than natural gas, 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) and the application dated October 2, 2023

Compliance Method: The permittee shall maintain documentation to demonstrate the type of fuel combusted in this source. Documentation shall include, but is not limited to, manufacturer’s specifications, purchase records, or safety data sheets for the fuel. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

S1-2. Production Limitation(s)

Not Applicable

S1-3. Operating Hour Limitation(s)

Not Applicable

S1-4. Emission Limitation(s)

- A. Particulate matter (PM) emitted from this source shall not exceed 0.02 grains per dry standard cubic foot (gr/dscf) of exhaust gas (10.3 pounds per hour [lbs/hr]) on a daily average basis.

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

Compliance Method: Compliance with this condition shall be assured by compliance with **Condition S1-1** and using the PM (total) emission factor of 7.6 pounds per million standard cubic feet (lbs/MMScf) of natural gas combusted from AP-42 Table 1.4-2.

- B. VOC emitted from this source shall not exceed 63.0 tons during any period of 12 consecutive months.

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

Compliance Method: The permittee shall calculate actual quantities of VOC, each individual HAP, and total HAP emitted from this source (E-Coat tank and two curing ovens) during each calendar month and each period of 12 consecutive months and maintain records of the emissions in a log (see example Log 1 and Log 2 in Appendix 8 or use a similar format that provides the same information). The logs shall be compiled and retained in accordance with **Condition G10**.

- C. Sulfur dioxide (SO₂) emitted from this source shall not exceed 0.02 pounds per hour on a daily average basis.

TAPCR 1200-03-14-.03(5)

Compliance Method: Compliance with this emission limit shall be assured by compliance with **Condition S1-1** and using the SO₂ emission factor of 0.6 lb/MMscf of natural gas combusted from AP-42 Section 1.4, Table 1.4-2.

- D. Carbon monoxide (CO) emitted from this source shall not exceed 15.2 tons during any period of 12 consecutive months.

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

Compliance Method: Compliance with this emission limit shall be assured by compliance with **Condition S1-1** and using the CO emission factor of 84 lb/MMscf of natural gas combusted from AP-42 Section 1.4, Table 1.4-1.

- E. Nitrogen oxides (NO_x) emitted from this source shall not exceed 7.0 tons during any period of 12 consecutive months.

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

Compliance Method: Compliance with this emission limit shall be assured by compliance with **Condition S1-1** and using the approved NO_x emission factor of 38.8 lbs/MMScf of natural gas combusted provided by the burner manufacturer.

The permittee has specified that these curing ovens are equipped with low NO_x burners. Documentation from the manufacturer for each oven which specifies that these features are present, and which also provides NO_x emission factors shall be retained in accordance with **Condition G10**.

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

Not Applicable

F1. 40 CFR Part 63 Subpart WWWWWW Requirements

F1-1. Pursuant to 40 CFR §63.11504(a)(1), this source is subject to 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations (Subpart WWWWWW). The affected source at this facility is each tank that contains one or more of the plating and polishing metal hazardous air pollutants (cadmium, chromium, lead, nickel, or manganese) and is used for non-chromium electroplating, electroless plating, or other non-electrolytic metal coating operations. The permittee must achieve compliance with the provisions of Subpart WWWWWW upon initial startup of the affected source.

TAPCR 1200-03-09-.03(8), 0400-30-38-.01, and 40 CFR §63.11506(c)

F1-2. Pursuant to 40 CFR §63.11507(g) and §63.11508(b) and (d)(8), the permittee must implement the applicable management practices in paragraphs (a) through (l) of this condition at all times, as practicable, for any affected new or existing plating and polishing process unit that contains, applies, or emits one or more of the plating and polishing metal HAP.

- (a) Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.
- (b) Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable.
- (c) Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable.
- (d) Use tank covers, if already owned and available at the facility, whenever practicable.
- (e) Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).
- (f) Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.
- (g) Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable.
- (h) Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.
- (i) Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.
- (j) Minimize spills and overflow of tanks, as practicable.
- (k) Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.
- (l) Perform regular inspections to identify leaks and other opportunities for pollution prevention.

Compliance Method: Compliance with this condition is assured through the recordkeeping required by **Condition F1-7**.

F1-3. To demonstrate continuous compliance with the applicable management practices specified in **Condition F1-2**, the permittee must satisfy the requirements in paragraphs (a) through (d) of this condition.

- (a) The permittee must always operate and maintain the affected source, including air pollution control equipment.
- (b) The permittee must prepare an annual compliance certification according to the requirements specified in **Condition F1-6** and keep it in a readily-accessible location for inspector review.
- (c) The permittee must implement the applicable management practices during all times that the affected tank or process is in operation.

- (d) The permittee must state in the annual compliance certification that the applicable management practices have been implemented, as practicable.

40 CFR §63.11508(d)(1), (2) and (8)

Compliance Method: Compliance with this condition is assured through the recordkeeping required by **Condition F1-7**.

- F1-4.** Pursuant to 40 CFR §63.11509(a), the permittee must submit an Initial Notification upon startup of the affected source in accordance with paragraphs (a) and (b) of this condition.

- (a) The Initial Notification must include the information specified in §63.9(b)(2)(i) through (iv) of the General Provisions of 40 CFR Part 63.
(b) The Initial Notification must include a description of the compliance method (e.g., use of wetting agent/fume suppressant) for each affected source.

40 CFR §63.11509(a)

Compliance Method: Compliance with this condition is assured by submitting the required notification within the timeframe specified. All notifications shall be submitted to the U.S. EPA and the Technical Secretary within the specified timeframes. Notifications submitted to the Technical Secretary shall be addressed to the Permitting Program and submitted to the address listed in **Condition G3**. Notifications submitted to the U.S. EPA shall be addressed to EPA Region IV and submitted to the address provided in 40 CFR §63.13. Copies of all notifications shall be maintained as required by **Condition F1-7** and as specified in **Condition F1-8**.

- F1-5.** Pursuant to 40 CFR §63.11509(b)(1), the permittee must submit a Notification of Compliance Status before the close of business on the date of startup of the affected source. The Notification of Compliance Status must include the following:

- (a) A list of affected sources and the plating and polishing metal HAP used in, or emitted by, those sources.
(b) The methods used to comply with the applicable management practices and equipment standards.
(c) A description of the capture and emission control systems used to comply with the applicable equipment standards.
(d) A statement by the owner or operator of the affected source as to whether the source is in compliance with the applicable standards or other requirements.

If the facility makes a change to any of the items listed above that does not result in a deviation, an amended Notification of Compliance Status must be submitted within 30 days of the change.

40 CFR §§63.11508(a) and 63.11509(b)

Compliance Method: Compliance with this condition is assured by submitting the required notification within the timeframe specified. All notifications shall be submitted to the U.S. EPA and the Technical Secretary within the specified timeframes. Notifications submitted to the Technical Secretary shall be addressed to the Permitting Program and submitted to the address listed in **Condition G3**. Notifications submitted to the U.S. EPA shall be addressed to EPA Region IV and submitted to the address provided in 40 CFR §63.13. Copies of all notifications shall be maintained as required by **Condition F1-7** and as specified in **Condition F1-8**.

- F1-6.** Pursuant to 40 CFR §63.11509(c), the permittee must prepare an annual certification of compliance report according to paragraphs (a) and (b) of this condition. These reports do not need to be submitted unless a deviation from the requirements of Subpart WWWW has occurred during the reporting year. Pursuant to §63.11509(d), if any deviations from the compliance requirements specified in Subpart WWWW occur during the year, the

permittee must report the deviations, along with the corrective action taken, and submit this report to the Technical Secretary.

- (a) For each affected tank or other affected plating and polishing operation that is subject to the management practices specified in **Condition F1-2**, the permittee must state in their annual compliance certification that they have implemented the applicable management practices, as practicable.
- (b) Each annual compliance report must be prepared no later than January 31 of the year immediately following the reporting period and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance report must be submitted to the Technical Secretary along with the deviation report, and postmarked or delivered no later than January 31 of the year immediately following the reporting period.

40 CFR §63.11509(c)

Compliance Method: Compliance with this condition is assured by preparing and submitting (if required) the annual compliance report within the timeframe specified. When required, reports shall be submitted to the U.S. EPA and the Technical Secretary within the specified timeframes. Reports submitted to the Technical Secretary shall be addressed to the Permitting Program and submitted to the address listed in **Condition G3**. Reports submitted to the U.S. EPA shall be addressed to EPA Region IV and submitted to the address provided in 40 CFR §63.13. Copies of all reports shall be maintained as required by **Condition F1-7** and as specified in **Condition F1-8**.

F1-7. Pursuant to 40 CFR §63.11509(e), the permittee must keep the records specified in paragraphs (a) through (c) of this condition.

- (a) A copy of any Initial Notification and Notification of Compliance Status that the permittee submitted and all documentation supporting those notifications.
- (b) The records specified in 40 CFR §63.10(b)(2)(i) through (iii) and (xiv) of the General Provisions of 40 CFR Part 63.
- (c) The records required to show continuous compliance with each management practice and equipment standard that applies to the permittee, as specified in **Condition F1-2**.

Compliance Method: Compliance with this requirement shall be demonstrated by maintaining copies of the required documents in accordance with the provisions of **Condition F1-8**.

F1-8. Pursuant to 40 CFR §63.11509(f), the permittee must keep each record for a minimum of five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee must keep each record onsite for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1) of the General Provisions to Part 63. The permittee may keep the records offsite for the remaining three years.

F1-9. Pursuant to 40 CFR §63.11510, the permittee must comply with the requirements of the General Provisions (40 CFR part 63 subpart A), according to Table 1 to Subpart WWWW in Appendix 9 of this permit.

Source Number	Source Description
02	<p>Boilers: Two natural gas-fired boilers with a rated heat input capacity of 12.5 MMBtu/hr each (25.0 MMBtu/hr total).</p> <p>These boilers are subject to 40 CFR 60, Subpart Dc</p>

S2-1. Input Limitation(s) or Statement(s) of Design

- A. The stated design heat input rate of each boiler is 12.5 million British thermal units per hour (MMBtu/hr). Should the permittee need to modify the source in a manner that increases the stated design heat input rate 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-.01(1)(d) and the application dated October 2, 2023

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

- B. Only natural gas shall be used as fuel for the boilers. The boilers are only capable of burning this fuel. Should the permittee need to modify the boilers to allow the use of a fuel other than natural gas 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-.01(1)(d) and the application dated October 2, 2023

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

S2-2. Production Limitation(s)

Not Applicable

S2-3. Operating Hour Limitation(s)

Not Applicable

S2-4. Emission Limitation(s)

- A. PM (total) emitted from this fuel burning installation shall not exceed 0.36 lb/MMBtu (9.0 lbs/hr) on a daily average basis.

TAPCR 1200-03-06-.02(2)(a)

Compliance Method: Compliance with this condition is assured by compliance with **Condition S2-1** and using the PM (total) emission factor of 7.6 lbs/MMScf of natural gas combusted from AP-42 Table 1.4-2.

- B. SO₂ emitted from this fuel burning installation shall not exceed 5.0 lb/MMBtu (125.0 lbs/hr) on a daily average basis.

TAPCR 1200-03-14-.02(2)(a)

Compliance Method: Compliance with this condition is assured by compliance with **Condition S2-1** and using the SO₂ emission factor of 0.6 lbs/MMScf of natural gas combusted from AP-42 Table 1.4-2.

- C. NO_x emitted from this fuel burning installation shall not exceed 9.7 tons during any period of 12 consecutive months.

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

Compliance Method: Compliance with this condition is assured by compliance with **Condition S2-1** and using the approved NO_x emission factor of 89.8 lbs/MMScf of natural gas combusted provided by the boiler manufacturer.

The permittee has specified that these boilers are not equipped with low NO_x burners. Documentation from the manufacturer for each boiler which also provides NO_x emission factors shall be retained in accordance with **Condition G10**.

- D. CO emitted from this fuel burning installation shall not exceed 9.1 tons during any period of 12 consecutive months.

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

Compliance Method: Compliance with this condition is assured by compliance with **Condition S2-1** and using the CO emission factor of 84.0 lbs/MMScf of natural gas combusted from AP-42 Table 1.4-1.

- E. VOC emitted from this fuel burning installation shall not exceed 0.6 tons during any period of 12 consecutive months.

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

Compliance Method: Compliance with this condition is assured by compliance with **Condition S2-1** and using the VOC emission factor of 5.5 lbs/MMScf of natural gas combusted from AP-42 Table 1.4-2.

S2-5. Source-Specific Visible Emissions Limitation(s)

Not Applicable

F2. 40 CFR Part 60 Subpart Dc Requirements

- F2-1.** This emission source is subject to and shall comply with the applicable requirements of 40 CFR 60, Subpart Dc – *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* (Subpart Dc). Pursuant to 40 CFR §60.40c(a), the affected facility to which Subpart Dc applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989, and that has a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr. Per §60.41c, a steam generating unit is defined, in part, as a device that combusts any fuel and produces steam or heats water or any heat transfer medium.

TAPCR 1200-03-09-.03(8) and 0400-30-39

F2-2. Pursuant to 40 CFR §60.48c(g)(1) and (2), the permittee shall record and maintain records of the amount of fuel combusted by each affected facility (boiler) during each calendar month. As an alternative to this requirement, the permittee may elect to record and maintain records of the total amount of natural gas delivered to the facility during each calendar month.

40 CFR §60.48c(g)(2) and (3)

Compliance Method: A log of the actual quantity of natural gas combusted by each boiler or delivered to the facility each month must be maintained at the facility and kept available for inspection by the Technical Secretary or a Division representative (see example log below or use a similar log that contains the same information). The log shall specify whether the permittee is recording natural gas combusted or fuel delivered. The log shall be compiled and retained in accordance with **Condition G10**.

Natural Gas Log for Boilers 1 and 2			
Month/Year	Natural Gas Combusted (ccf/mo. or mcf/mo.)		Natural Gas Delivered (ccf/mo. or mcf/mo.)
	Boiler 1	Boiler 2	

F2-3. The permittee must comply with the requirements of 40 CFR Part 60, Subpart A, according to the applicability of 40 CFR Part 60, Subpart A as identified in Appendix 10 of this permit. In the event of a discrepancy between the requirements shown in Appendix 10 and the requirements of Subpart A as published in the Federal Register, the Federal Register language shall be controlling.

40 CFR §60.1(a) and 40 CFR Part 60, Subpart Dc

(end of conditions)

The permit application gives the location of this source as 35.439860 Latitude and -89.428720 Longitude.

Appendix 1: Notification of Change in Responsible Person

Facility (Permittee): _____ Magna Structures Tennessee LLC _____

Facility ID: _____ 38-0177 _____

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: _____

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): Magna Structures Tennessee LLC

Facility ID: 38-0177

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): Magna Structures Tennessee LLC (Previous Owner)

Facility ID: 38-0177

Facility (Permittee): _____ (New Owner) _____
 Date of Ownership Change

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

Responsible Person/Authorized Contact	Email Address
Mailing Address	Phone with area code
Principal Technical Contact	Email Address
Mailing Address	Phone with area code
Billing Contact	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 0400-30¹, 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:

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)

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

Appendix 4: Startup Certification

Facility (Permittee): Magna Structures Tennessee LLC

Facility ID: 38-0177

Startup Certification for Source Number: _____

The permittee shall certify the startup date for each new or modified air contaminant source regulated by construction permit 981829 by submitting this document.

Date of startup: _____ / _____ / _____
Month Day Year

As the Responsible Person of the above mentioned facility (permittee), I certify that the information contained in this Startup Certification 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 5: Fees

All minor and conditional major source annual emission fees are due and payable to the Division in full according to SCHEDULE I below². 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

² 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 if you have any questions.

Appendix 6: Emission Statement for VOC and NO_x

Not Applicable

Appendix 7: Agreement Letters

Not Applicable

Appendix 8: Example Logs

Example logs for monthly and Annual VOC and HAP emission calculations, **Condition S1-4B**.

LOG 1: Monthly VOC and HAP Emission Log													
Month/Year:				Source Number:				Emissions					
[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]	[11]	[12]	[13]	[14]
Material ID	Material Name	Material Usage (gal/month or lb/mo)	Material Density (lb/gal)	VOC Content (wt% or lb VOC/gal)	HAP ₁ Content (wt% or lb HAP ₁ /gal)	HAP ₂ ¹ Content (wt% or lb HAP ₂ /gal)	Total HAP Content (wt% or lb HAP ₁ /gal)	VOC (lb/mo)	VOC (ton/mo)	HAP ₁ (lb/mo)	HAP ₁ (ton/mo)	Total HAP (lb/mo)	Total HAP (ton/mo)
Total													

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

[9] VOC Emissions (lb/mo) = [3] Material Usage (gal/mo) * [4] Material Density (lb/gal) * [5] VOC Content (wt%), or

[9] VOC Emissions (lb/mo) = [3] Material Usage (gal/mo) * [5] VOC Content (lb/gal), or

[9] VOC Emissions (lb/mo) = [3] Material Usage (lb/mo) * [5] VOC Content (wt%)

[10] VOC Emissions (ton/mo) = [9] VOC Emissions (lb/mo) / 2,000 lb/ton

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

[11] HAP₁ Emissions (lb/mo) = [3] Material Usage (gal/mo) * [6] HAP₁ Content (lb/gal), or

[11] HAP₁ Emissions (lb/mo) = [3] Material Usage (lb/mo) * [6] HAP₁ Content (wt%)

LOG 2: Annual VOC and HAP Emission Log								
Month/Year	VOC		HAP ₁		HAP ₂		Total HAP	
	(ton/mo)	(ton/12 consecutive mo) ¹	(ton/mo) ²	(ton/12 consecutive mo)	(ton/mo) ²	(ton/12 consecutive mo)	(ton/mo)	(ton/12 consecutive mo)

¹ The tons per 12-consecutive month values are the sum of the emissions in the 11 months preceding the month just completed + the emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this table, this value will be equal to the value for tons per month. For the second month, it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed [i.e., 6 (2) represents 6 tons emitted in 2 months].

² The columns for individual HAP should be repeated for each HAP emitted. Identify each HAP by name and/or CAS# in the appropriate column heading.

Appendix 9: General Provisions for 40 CFR 63, Subpart WWWWWW

You are required to comply with the following General Provisions of the federal National Emission Standards for Hazardous Air Pollutants (NESHAP):

Citation	Subject
63.1 ¹	Applicability.
63.2	Definitions.
63.3	Units and abbreviations.
63.4	Prohibited activities.
63.6(a), (b)(1)-(b)(5), (c)(1), (c)(2), (c)(5), and (j)	Compliance with standards and maintenance requirements.
63.10(a), (b)(1), (b)(2)(i)-(iii), (xiv), (b)(3), (d)(1), (f)	Recordkeeping and reporting.
63.12	State authority and delegations.
63.13	Addresses of State air pollution control agencies and EPA regional offices.
63.14	Incorporation by reference.
63.15	Availability of information and confidentiality.

¹Section 63.11505(e), exempts affected sources from the obligation to obtain title V operating permits.

TAPCR 1200-03-09-.03(8) and 0400-30-38-.01

Appendix 10: General Provisions for 40 CFR 60, Subpart Dc

You are required to comply with the following General Provisions of the federal Standards of Performance for New Stationary Sources (NSPS):

General Provisions Citation 40 CFR	Subject of Citation	Applies to Subpart	Explanation
§60.1	General applicability of the General Provisions	Yes	General/Initial applicability determination; applicability after standard established.
§60.2	Definitions	Yes	General Definitions. Additional Terms defined in §60.41c.
§60.3	Units and abbreviations	Yes	General Units and Abbreviations.
§60.4	Address	Yes	Addresses for regional EPA offices and State/Local Agencies.
§60.5	Determination of construction or modification	Yes	Outlines Administrator's (Technical Secretary) authority on whether actions by the owner/operator are construction or modification.
§60.6	Review of plans	Yes	Outlines Administrator's (Technical Secretary) authority to review plans and provide technical advice to owner/operator due to construction or modification.
§60.7	Notification and Recordkeeping	Yes	General notification and recordkeeping guidelines.
§60.8	Performance tests	Yes	General performance test guidelines. §60.8(f) does not apply to this subpart.
§60.9	Availability of information	Yes	General notification to the public of information obtained by the Administrator (Technical Secretary)
§60.10	State Authority	Yes	Outlines the State/local authority regarding emission standards, limitations, permit approvals, etc.
§60.11	Compliance with standards and maintenance requirements	Yes	General compliance and maintenance requirements.
§60.12	Circumvention	Yes	Circumventing standards applicable to a source.
§60.13	Monitoring requirements	Yes	General monitoring requirements.
§60.14	Modification	Yes	General requirements pertaining to modification of a source.
§60.15	Reconstruction	Yes	General requirements pertaining to reconstruction of a source.
§60.16	Priority list	No	Prioritized major source categories.
§60.17	Incorporations by reference	Yes	Outline of materials incorporated by reference per the Director of Federal Register.
§60.18	General control device requirements	Yes	General requirements for control devices used to comply with applicable subparts of 40 CFR parts 60 and 61.
§60.19	General notification and reporting requirements	Yes	General requirements for notification and reporting.

TAPCR 1200-03-09-.03(8) and 0400-30-39