



**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: 080073
Facility (Permittee): Talos Engineered Products, LLC
Facility ID: 59-0174
Facility Address: 841 Industrial Drive, Lewisburg
Marshall County
Facility Classification: True Minor
Federal Requirements: None
Facility Description: Metal Package Sorting and Handling Equipment Manufacturing

Permit 080073, consisting of 17 pages is hereby issued September 26, 2022, 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 August 1, 2032. 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 surface coating paint booth	Existing	Exhaust Filters

Section II – Permit Record

Permit Type	Description of Permit Action	Issue Date
Initial	Initial permit issuance	September 26, 2022

Section III - General Permit Conditions

G1. Responsible Person

The application that was utilized in the preparation of this permit is dated January 25, 2022, and is signed by Mark Rynearson, Safety 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 the change. 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 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"> • Notifications • Startup certifications • Applications • NSPS reports • MACT/GACT/NESHAP reports • Emission Statements 	<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		Columbia Environmental Field Office Division of Air Pollution Control 1421 Hampshire Pike Columbia, TN 38401 APC.ColuEFO@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

- 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

At the time of application, the potential to emit hazardous air pollutants (HAP) from this facility was less than the major source applicability thresholds of 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAP. 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)

G13. NSPS/NESHAP/MACT/GACT Standards – Not Applicable

G14. VOC and NO_x Emission Statement – Not Applicable

G15. Permit Supersedes Statement

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

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

G16. Source Testing Requirements – Not Applicable

G17. VOC and HAP Content, Surface Coating

The as-supplied VOC and HAP content of all VOC- and HAP-containing materials (all coatings, inks, adhesives, thinners, and solvents) to be used by this 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 and maintained in a log. 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. The log(s) shall be retained in accordance with **Condition G9**.

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. Scanned documents (maintained electronically) may be used to fulfill this requirement.

Section IV – Federal and/or State Only Requirements

F1-1. The permittee is placed on notice that coating operations located at an area source of hazardous air pollutants (HAP) that perform spray application of coatings that contain compounds of any target HAP, as defined in 40 CFR §63.11180, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in 40 CFR §63.11180, are subject to 40 CFR Part 63, Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. The SDS for the coatings declared for use at the time of application did not indicate the presence of any target HAP. Use of a spray-applied coating that contains compounds of one or more target HAP will subject the facility to all applicable requirements of Subpart HHHHHH upon first use of such material, including the initial notification requirements of §63.11175. Additionally, the facility must apply for and receive a construction permit pursuant to TAPCR 1200-03-09-.01(1) prior to use of the coating.

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

Section V - Source Specific Permit Conditions

Source Number	Source Description
01	Surface Coating Operation: One spray booth for coating small batch orders and touchup of metal package sorting and handling equipment. This spray booth utilizes exhaust filter control.

S1-1. Input Limitation(s) or Statement(s) of Design - Not Applicable

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 (0.04 pounds per hour, on a daily average basis).

TAPCR 1200-03-07-.04(1) and the application dated January 25, 2022

Compliance Method: The permittee shall operate and maintain exhaust filters for the spray booth. The spray booth shall not operate unless the exhaust filters are in place and functioning properly. The permittee shall inspect the filters on a daily basis, prior to starting the source. 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 a problem has developed during an inspection of the exhaust filters. Inspection records shall be kept 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. Days that the source is not in operation shall be noted. These records shall be retained in accordance with **Condition G9**.

- B. Volatile organic compounds (VOC) emitted from this source shall not exceed 6.11 tons during any period of 12 consecutive months.

TAPCR 1200-03-07-.07(2) and the application dated January 25, 2022

Compliance Method: The permittee shall demonstrate compliance with this condition by calculating actual quantities of VOC, each individual HAP, and total HAP emitted from this source during each month and during each period of 12 consecutive months. Records of these emissions shall be maintained in a form that readily shows compliance with this condition (see example logs in Appendix 8 or use an alternate format that readily provides sufficient information to determine compliance). The as-supplied VOC and HAP content of all VOC and HAP-containing materials (all coatings, inks, adhesives, thinners, and solvents) to be used by this source shall be determined as specified in **Condition G17**. All records and calculations required in this condition shall be retained as specified in **Condition G9**.

S1-5. Source-Specific Visible Emissions Limitation(s) - *Not Applicable*

(end of conditions)

The application gives the location of this source as 35.4254263 Latitude and -86.744339 Longitude.

Appendix 1: Notification of Change in Responsible Person

Facility (Permittee): Talos Engineered Products, LLC

Facility ID: 59-0174

Former Responsible Person:

<u></u>	<u></u>
Name	Title

New Responsible Person:

<u></u>	<u></u>
Name	Title
<u></u>	
Email	

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.

<u>Signature</u>		<u>Date</u>
<u>Signer's name (print)</u>	<u>Title</u>	<u>Phone (with area code)</u>

Appendix 2: Notification of Changes

Facility (Permittee): Talos Engineered Products, LLC

Facility ID: 59-0174

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): Talos Engineered Products, LLC (Previous Owner)

Facility ID: 59-0174

Facility (Permittee): _____ (New Owner)

Email Address: _____

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

Date of Ownership Change: _____

Comments:

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:

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)

¹ 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 below² 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

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

Monthly VOC and HAP Calculation Table

Month/Year:								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													

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

[9] 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)

[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)

Annual VOC and HAP Calculation Table

Month/Year	VOC		HAP ₁		HAP ₂		Total HAP	
	[10] (ton/mo)	(ton/12 consecutive mo) ¹	[12] (ton/mo) ²	(ton/12 consecutive mo)	(ton/mo) ²	(ton/12 consecutive mo)	[14] (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 contained in the materials used. Monthly emissions should be calculated for each individual HAP. Identify each HAP by name and/or CAS# in the appropriate column headings.