CONSTRUCTION PERMIT SUMMARY REPORT

Company Name: Talos Engineered Products, LLC File Number: 59-0174 EPS Initials: JMRh

Permit Number(s): 080073 Source Point Number(s): 01

Application Received (date): January 25, 2022 Application Complete (date): June 14, 2022

Air Quality Analysis Performed? Yes☐ No☒

Briefly describe the project: (new source, modifications) (what the process is) (type controls proposed) (emissions expected, qualitative) (replacing what sources) (background information)

This surface coating spray booth applies solvent-based coatings to metal package sorting and handling equipment. The spray booth is primarily used for small custom orders and paint touchup. Exhaust filters are utilized to control particulate matter emissions.

This spray booth was previously permitted under facility 59-0090 and permit 067218P. In 2014, the operation was relocated to facility 59-0174 without obtaining a construction or operating permit. The Division has evaluated the potential emissions of this emission unit and determined that it does **not** constitute an *insignificant activity* or *insignificant emissions unit*, as defined in part 1200-03-09-.04(2)(a)3 of the Tennessee Air Pollution Control Regulations. Specifically, the potential to emit xylene exceeds 1,000 pounds per year. Therefore, this combined permit re-establishes the facility's ability to operate the spray booth as a permitted source.

At the time of application, this surface coating operation does not utilize coating containing a target HAP. Therefore, this source is **not** subject to 40 CFR 63, Subpart HHHHHH (National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources).

Rules Analysis

Title V☐ Cond. Major☐ Minor☒ Source category listed in 1200-3-9-.01(4)(b)1(i)? Yes☐ No☒

Reason for PSD:	New source above ____ TPY	☐	Sig. increase in ____ emissions	☐	N/A	☒
Applicable NSPS:	40 CFR Part 60, Subpart ____	☐	State Rule 1200-3-16-. ____	☐	N/A	☒
Applicable NESHAP:	40 CFR Part 61, Subpart ____	☐	State Rule 1200-3-11-. ____	☐	N/A	☒
Applicable NESHAP:	40 CFR Part 63, Subpart ____	☐	State Rule 1200-3-31-. ____	☐	N/A	☒

Other Applicable State Rules

PM Emissions:	1200-3-	07	-. 04(1)	☒	N/A ☐	NO_x Emissions:	1200-3-	____	-. ____	☐	N/A ☒
SO_2 Emissions:	1200-3-	____	-. ____	☐	N/A ☒	Lead Emissions:	1200-3-	____	-. ____	☐	N/A ☒
CO Emissions:	1200-3-	____	-. ____	☐	N/A ☒	PM Emissions:	1200-3-	____	-. ____	☐	N/A ☒
VOC Emissions:	1200-3-	07	-. 07(2)	☒	N/A ☐	VOC Emissions:	1200-3-	____	-. ____	☐	N/A ☒

Visible Emissions from Source 01 not to exceed 20 % opacity per Method 9 (Rule 1200-3-05 -.03(6))

Visible Emissions from ____ not to exceed ____ % opacity per Method ____ (Rule 1200-3-___-.____)

Visible Emissions from ____ not to exceed ____ % opacity per Method ____ (Rule 1200-3-___-.____)

Comments: ____

Emission Summary

Permit Number: 080073

Source Status: New☐ Modification☐ Expansion☐ Relocation☒ **Permit Status:** New☒ Renewal☐

PSD☐ NSPS☐ NESHAPs☐ **Previous Permit Number:** **Construction** _____ **Operating** 067218P

	Pounds/Hour			Tons/Year				Date of Data	Applicable 1200-03-
	Actual	Potential (Controlled)[a]	Allowable	Actual	Potential (Controlled)[a]	Allowable	Net Change		
PM	0.005	0.005	0.04	0.005	0.02	0.18		January 25, 2022	07-.04(1)
VOC				1.41	6.11	6.11		January 25, 2022	07-.07(2)
Single HAP[b]					2.87			January 25, 2022	
Total HAP					4.90			January 25, 2022	

Note: Additional information was received on February 22, February 24, April 25, and May 17, 2022.

a) Potential emissions are calculated using the daily coating and clean-up usage data provided in the application dated January 25, 2022. The daily usage data is based on eight hours of operation per day. The yearly potential to emit is calculated based on 8,760 hours of operation per year. The potential to emit particulate matter (PM) assumes the exhaust filters have a 98% control efficiency.

b) At the time of application, xylene is the single HAP with the highest potential to emit.

PERMITTING PROGRAM: JMRh DATE: September 26, 2022