From: Air.Pollution Control
To: APC Permitting
Subject: FW: 59-0090 Talos APC 107
Date: Tuesday, January 25, 2022 3:39:44 PM
Attachments: image001.png
Filed out forms for EPA air permit.pdf

From: John Koroll <John.Koroll@tn.gov>
Sent: Tuesday, January 25, 2022 1:11 PM
To: Air.Pollution Control <Air.Pollution.Control@tn.gov>
Cc: Mark Rynearson <Mark.Rynearson@talosep.com>
Subject: 59-0090 Talos APC 107

Attached is the completed APC 100 and 107 for 59-0090: Talos. They are seeking an insignificant determination from APC.

From: Mark Rynearson <Mark.Rynearson@talosep.com>
Sent: Tuesday, January 25, 2022 1:00 PM
To: John Koroll <John.Koroll@tn.gov>
Cc: Marie LaLonde <Marie.Lalonde@talosep.com>
Subject: [EXTERNAL] RE: Air Pollution Control Inspection

Good afternoon, John

Attached is the submission of Talos Engineered Products filled out forms for our Operating Air Quality Permit for the State of Tennessee. As we had discussed when you were here for the audit on 1-12-2022, I was unaware that this permit existed, therefor I had no data to share with you. The person that took out the permit has left the company some time ago. I have been asked by Talos to be the responsible person for this permit, see the "Notification of Change in Responsible Person" form attached.

The situation at Talos has changed significantly from when the permit was originally issued. We have gone from two wet spray booths doing 100% of all our product coating process to a powder coat line doing 95% of our product coating process. The only thing the wet spray booth is used for is touch up and some small lots of products that will not fit in the powder coat system. My calculations show we are way under the 5-ton threshold limit requiring a permit.

I am requesting that Talos be categorized as an insignificant producer of air pollutants, and we would then surrender our permit.

If you need any further information, please let me know and I will get it to you as soon as possible.

Mark Rynearson

Mark Rynearson – Safety Manager
TALOS ENGINEERED PRODUCTS, LLC
841 Industrial Dr.; Lewisburg, TN 37091
1-804-301-0502 (mobile)

TENNESSEE AIR POLLUTION CONTROL BOARD
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
.SHVILLE, TENNESSEE 37243-1531

OPERATING PERMIT Issued Pursuant to Tennessee Air Quality Act

Date Issued: May 24, 2013

Permit Number: 067218P

Date Expires: May 23, 2023

Issued To:

Talos Engineered Products, LLC.

Installation Address:

899 Industrial Drive
Lewisburg

Installation Description:

Two Spray Paint Booths
Exhaust Filter Control

Emission Source Reference No.

59-0090-01

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.

CONDITIONS:

1. The application that was utilized in the preparation of this permit is dated May 22, 2013, and is signed by Kenneth Wood, President for the permitted facility. If this person terminates employment or is reassigned different duties and is no longer the responsible person to represent and bind the facility in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification shall be in writing and submitted within thirty (30) days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the facility in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

(conditions continued on next page)

Barry R. Stephens

TECHNICAL SECRETARY

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.

NON-TRANSFERABLE

POST AT INSTALLATION ADDRESS

2. This permit covers two spray paint booths, coating of metal components and structural steel.

3. Particulate matter (TSP) emitted from this source shall not exceed 0.02 grain per dry standard cubic foot of stack gases (3.17 pounds per hour). This emission limitation is established pursuant to Rule 1200-03-07-.04(1) of the Tennessee Air Pollution Control Regulations.

4. Total Volatile Organic Compounds (VOC) emitted from this source shall not exceed 2.75 tons per month and 33.00 Tons per calendar year. This emission limitation is established pursuant to Rule 1200-03-07-.07(2) of the Tennessee Air Pollution Control Regulations.

5. The maximum emission rate from the entire facility for any single hazardous air pollutant (HAP), listed pursuant to Section 112(b) of the Federal Act, shall not exceed 9.9 tons per year. Total emissions of all HAPs from the entire facility shall not exceed 24.9 tons per year. In the event that the emission rates from the entire facility exceed these limits, the permittee shall provide written notification of the exceedance(s) to the Technical Secretary within fifteen (15) days from the date of discovery.

6. The as-supplied VOC content of all VOC-containing materials to be used by this source shall be determined as follows:

All Coatings, Inks, Adhesives, Thinners, and Solvents - from Material Safety Data Sheets (MSDS) or manufacturer or vendor formulation data which explicitly list the VOC content by weight.

The results of these determinations shall be compiled in the following tabular format or an alternative format which readily provides the same required information. This table, along with MSDS or other supporting documentation for each material to be used, shall be maintained at the source location and made available for inspection by the Technical Secretary or his representative, beginning within 180 days of initial start-up. If new materials are used, or if material formulation is changed, the table shall be updated within 90 days from the initial date of usage of the new or altered material.

Process Material Description	Material Density (lb/gal)	VOC Content (lb/gal)
Material #1		
Material #2		
etc.		

7. The permittee shall calculate the actual quantities of VOC and HAPs emitted from this facility during each calendar month and maintain records of these emissions in a form that readily shows compliance with Conditions 4 and 5 of this permit. (See example below) This log must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. This log must be retained for a period of not less than five (5) years.
All data, including all required calculations, must be entered in the log no later than 30 days from the end of the month for which the data is required.

Process Material	Usage (gal/mo)	VOC Content (lb/gal)	VOC Emitted (ton/mo)	HAP #1 Content (lb/gal)	HAP #1 Emitted (ton/mo)	HAP #2 Content (lb/gal)	HAP #2 Emitted (ton/mo)	Total HAP Content (lb/gal)	Total HAPs Emitted (ton/mo)
Coating #1									
Coating #2									
etc.									
Thinners									
Clean-up Solvents									
Totals:									

(conditions continued on next page)

8. Visible emissions from this source shall not exhibit greater than twenty percent (20%) opacity, except for one (1) six-minute period in any one (1) hour period and for no more than four (4) six-minute periods in any twenty-four (24) hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average). TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.01(1).

9. Exhaust filters must be installed, be in place and properly functioning at all times during the operation of this source.

10. The issuance of this operating permit supersedes all previously issued permit(s) for this air contaminant source.

11. The issuance of this permit does not exempt the permittee from any requirements of the Environmental Protection Agency pertaining to emissions from the operation of this source.

12. This permit is valid only at this location. TAPCR 1200-03-09-.03(6).

13. The permittee shall apply for renewal of this permit not less than sixty (60) days prior to the permit expiration date, pursuant to Division Rule 1200-03-09-.02(3).

(End of Conditions)

This operating permit was issued on the company's request for a new permit to reflect both the company name change and the responsible official change.

Emission Summary

Permit Number: 067218P

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

PSD☐ NSPS☐ NESHAPs☐ **Previous Permit Number:** Construction 956384P Operating 058049P

	Pounds/Hour			Tons/Year				Date of Data	*	Applicable Standard 1200-03-
	Actual	Potential	Allowable	Actual	Potential	Allowable	Net Change			
TSP	8.30	16.60	3.17	5.40	36.30	13.89		3/21/05		07-.04(1)
SO_2										
CO										
VOC				10.91	33.00	33.00		3/21/05		07-.07(2)
NO_X										
HAP				2.72	8.20	8.20		3/21/05		07-.07(2)

* - Source of data: previous permit # 956384P and permit application dated March 4, 2005.

Note: HAP emissions included in the VOC emissions.

Company requested for a new operating permit reflecting both the company name change and responsible official change. The daily operations, the processes and the emissions at the facility has not changed.

PERMITTING PROGRAM: SK DATE: May 19, 2013

Appendix 1: Notification of Change in Responsible Person

Facility (Permittee) Talos Engineered Products

Facility ID 067218P

Former Responsible Person Ken Wood (Name) President (Title)

New Responsible Person Mark Rynearson (Name) Safety Manager (Title)

mrynearson@talosep.com (Email)

Date New Responsible Person was assigned this duty: 1-12-2022

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 madeunder penalty of perjury.

Signature		Date
Mark Rynearson		1-25-2022
Signer's name (print)	Title	Phone (with area code)
Mark Rynearson	Safety Manager	804-301-0502

DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor, Nashville, TN 37243
Telephone: (615) 532-0554, Email: Air.Pollution.Control@TN.gov

NON-TITLE V PERMIT APPLICATION
FACILITY IDENTIFICATION

Type or print and submit. Attach appropriate source description forms.

SITE INFORMATION

1. Organization's legal name and SOS control number [as registered with the TN Secretary of State (SOS)]
Talos Engineered Products LLC

2. Site name (if different from legal name)

3. Is a construction permit application fee being submitted? Yes ☐ No ☑
(see instructions for appropriate fee to submit)

4. Site address (St./Rd./Hwy.)		County name
841 Industrial Dr		Marshall
City	Zip code	**5.** NAICS or SIC code
Lewisburg	37091	3535

6. Site location (in lat. /long.)	Latitude	Longitude
	35.4254263	-86.744339

CONTACT INFORMATION (RESPONSIBLE PERSON)

7. Responsible person/Authorized contact			Phone number with area code
Mark Rynearson			1-804-301-0502
Mailing address (St./Rd./Hwy.)			Fax number with area code
841 Industrial drive			None
City	State	Zip code	Email address
Lewisburg	TN	37091	mrynearson@talosep.com

CONTACT INFORMATION (TECHNICAL)

8. Principal technical contact			Phone number with area code
Mark Runearson			1-804-301-0502
Mailing address (St./Rd./Hwy.)			Fax number with area code
841 Industrial Drive			None
City	State	Zip code	Email address
Lewisburg	TN	37091	mrynearson@talosep.com

CONTACT INFORMATION (BILLING)

9. Billing contact			Phone number with area code
Marilyn Lopez			1-931-270-7747
Mailing address (St./Rd./Hwy.)			Fax number with area code
841 Industrial Drive			None
City	State	Zip code	Email address
Lewisburg	TN	37091	Marilyn.lopez@talosep.com

AIR CONTAMINANT SOURCE(S) INFORMATION

10. Description of air contaminant source(s) and Unique Source ID(s). List, identify, and briefly describe process emission sources, fuel burning installations, and incinerators that are contained in this application and include a Unique Source ID for each source. The Unique Source ID is a name/number/letter, which uniquely identifies the air contaminant source(s), like Boiler #1, Paint Line #1, Engine #1, etc. (see instructions for more details)

59-0090-01
One spray paint booth with exhaust filter control
Permit #067218P

11. Is the air contaminant source(s) in a nonattainment area? If "Yes", then minor source BACT must be addressed. Yes ☐ No ☑

	Hours/Day	Days/Week	Weeks/Year	Days/Year
12. Normal operation:	8	5	51	255
13. Percent annual throughput	Dec. – Feb. 100	March – May 100	June – August 100	Sept. – Nov. 100

TYPE OF PERMIT REQUESTED (check appropriate box)

14. Operating permit ☑	Date construction started	Date completed	Date of ownership change (if applicable)
	Last permit number(s) 067218P	Emission Source Reference Number(s) 59-0090-01	
Construction permit ☐	Last permit number(s)	Emission Source Reference Number(s)	

If you chose Construction permit above, then choose either New Construction, Modification, or Location Transfer

New Construction ☐	Starting date	Completion date
Modification ☐	Date modification started or will start	Date completed or will complete
Location Transfer ☐	Transfer date	Address of last location

15. Describe changes that have been made to this equipment or operation(s) since the last construction or operating permit application:

Permit #067218P was issued for two spray paint booths. Currently, there is only one paint booth in operation that is used for small batch orders and touch up jobs. There is one powder coating line that is used 95% or more of the time.

16. Comments

Same as above.

SIGNATURE

Based upon information and belief formed after a reasonable inquiry, I, as the responsible person of the above mentioned facility, certify that the information contained in this application is accurate and true to the best of my knowledge. As specified in TCA Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

17. Signature (application must be signed before it will be processed)		**Date**
Mark Rynearson		1-25-2025
Signer's name (type or print)	**Title**	**Phone number with area code**
Mark Rynearson	Safety Manager	804-301-0502

DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor, Nashville, TN 37243
Telephone: (615) 532-0554, Email: Air.Pollution.Control@TN.gov

NON-TITLE V PERMIT APPLICATION
SURFACE COATING DESCRIPTION

Type or print. Submit for each spray booth, dip tank, or other surface coating equipment. Submit with the APC 100.

GENERAL IDENTIFICATION AND DESCRIPTION

1. **Organization's legal name and SOS control number** [as registered with the Tennessee Secretary of State (SOS)]	2. **Emission Source Reference Number**
Talos Engineered Products LLC	59-0090-01

3. Is this air contaminant source subject to an NSPS or NESHAP rule? Yes ☐ No ☑
If Yes, list rule citation, including Part, Subpart, and applicable Sections:

COATING OPERATION DATA

4. Unique Source ID (name/number/letter that uniquely identifies this air contaminant source, like Paint Line 1)
01 - One Spray Paint Booth

5. **Type of coating operation**	Spray booth	Dip tank	Other (describe)
	☑	☐	

6. **Spray booth dimensions**	Width (ft.)	Height (ft.)	Depth (ft.)	Number of open sides
	17' 9"	10' 0"	22' 5"	1

7. **Method of spray:**	Airless	Air atomized	Electrostatic			Overspray (Percent)	Date purchased *
			Airless	Disc	Air atomized		
	☐	☑	☐	☐	☐	15%	?

8. **Exhaust data:**	Number of fans	Total horsepower	Total volume (CFM)
	1	7.5	216.5

9. **Exhaust control:**	None	Waterwash	Exhaust filters	Baffle plates	Adsorption **	Other (Describe)
	☐	☐	☑	☐	☐	

10. **Exhaust stack data** **	Diameter (Ft.)	Height (Ft.) Above Grade	Flow (CFM)	Specify serial numbers that share this vent
	4'	18' 5"	216.5	None

11. Control device. Description of proposed monitoring, recordkeeping, and reporting to assure compliance with emission limits. Include operating parameters of control device (flow rate, temperature, pressure drop, etc.).
Exhaust filters with pressure drop monitoring

* The actual surface coating equipment (spray gun, spray heads, etc.) and not the spray booth per se determines the status of the source (new or existing).

** Complete one line for each stack or vent. Attach additional sheets if necessary

NOTE: This application will not be processed unless all of the following information is provided.

MATERIAL DATA

12. Coatings, Thinners, and Clean-up Solvents used:

List all types of coatings, thinners, and clean-up solvents used and attach a statement of the chemical composition of each (i.e. Safety Data Sheet). This statement usually may be obtained from the coating, thinner, or clean-up solvent supplier. The minimum information required is the percent of solids by weight, the percent volatile by weight, the hydrocarbon composition and/or description of the volatile component, and the density of the coating, thinner, or clean-up solvent in pounds per gallon.

Coating name	Base [Water, Powder or Solvent*]	%Solids by Weight	%Volatile by Weight	Density (Lbs. /Gal.)	Quantity used		
					Gallons/Day		Gal./Mo.
					Average	Maximum **	Average
Quick Dry Enamel Repose Gray	Solvent	38.3%	61.7%	7.88 lbs	0.42		8.9
Quick Dry Enamel RAL7035	Solvent	38.3%	61.7%	7.88 lbs	0.39		8.3
Quick Dry Enamel RAL9003	Solvent	40.9%	59.1%	8.44 lbs	0		0.0
Quick Dry Enamel RAL5003	Solvent	36.4%	63.6%	7.70 lbs	0		0.0
Quick Dry Enamel RAL5015	Solvent	36.4%	63.6%	7.70 lbs	0.02		0.5
Quick Dry Enamel RAL1023	Solvent	39.1%	60.9%	7.66 lbs	0.16		3.3
Quick Dry Enamel Safety Yellow	Solvent	39.1%	60.9%	7.66 lbs	0.24		5.0
E61 Gray Primer	Solvent	74.5%	25.5 %	12.82 lbs	0.32		6.7
Thinner name Xylene	solvent	0	100%	7.17 lbs	0.44		9.2
Clean – up solvent name Acetone	Exempt	0	100%	6.59 lbs	0.16		3.3

* Name Solvent Base type

** For new construction, this quantity will be used as a permit limitation on capacity.

13. Air contaminants. Emission estimates for each air contaminant emitted from this point should be based on stack sampling results or engineering calculations. Calculations should be attached on a separate sheet. (see instructions for more details)

Air contaminants	Average Emissions (Lbs./Hr.)	Maximum Emissions (Lbs./Hr.)	Concen-tration	Average Emissions (Tons/Yr.)	Potential Emissions (Ton/Yr.)	Emissions Estimation Method Code *	Control Devices *	Control Effi-ciency %
Particulate matter (PM)								
Sulfur dioxide (SO_2)								
Carbon monoxide (CO)			PPM					
Volatile organic compounds (VOC)			PPM					
Nitrogen oxides (NO_x)			PPM					
Hydrogen fluoride (HF)								
Hydrogen chloride (HCl)								
Lead (Pb)								
Greenhouse gases (CO_2 equivalents)								
Hazardous air pollutant (specify)								
Hazardous air pollutant (specify)								
Hazardous air pollutant (specify)								
Hazardous air pollutant (specify)								
Hazardous air pollutant (specify)								
Hazardous air pollutant (specify)								
Other (specify)								
Other (specify)								

* Refer to the tables in the instructions for estimation method and control device codes.

EQUIPMENT DESCRIPTION		
14. Equipment manufacturer Col-Met	Model number IB-2010	Serial number (or plant ID) NA
Construction date		Modification date
Describe any modifications*		

15. Describe articles coated
Package handling and sorting equipment

16. Comments
We have converted 95% of all our painting from wet spray to powder coat

SIGNATURE

If this form is being submitted at the same time as an APC 100 form, then a signature is not required on this form. Date this form regardless of whether a signature is provided. If this form is NOT being submitted at the same time as an APC 100 form, then a signature is required.

Based upon information and belief formed after a reasonable inquiry, I, as the responsible person of the above mentioned facility, certify that the information contained in this application is accurate and true to the best of my knowledge. As specified in TCA Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

17. Signature		**Date** 1-25-2022
Signer's name (type or print) Mark Rynearson	**Title** Safety Manager	**Phone number with area code** 804-301-0502