

Aemilia Hamel

From: Air.Pollution Control
Sent: Wednesday, 26 January, 2022 12:08
To: APC Permitting
Subject: FW: 59-0090 Talos APC 107
Attachments: EPA coating - APC 107 Surface Coating - Revised.pdf

From: John Koroll <John.Koroll@tn.gov>
Sent: Wednesday, January 26, 2022 11:49 AM
To: Air.Pollution Control <Air.Pollution.Control@tn.gov>
Cc: Mark Ryneearson <Mark.Ryneearson@talosep.com>
Subject: FW: 59-0090 Talos APC 107

Attached is additional information for 59-0090 Talos. The revised APC 107 has information entered for the facility's "Potential to Emit".

From: Mark Ryneearson <Mark.Ryneearson@talosep.com>
Sent: Wednesday, January 26, 2022 9:34 AM
To: John Koroll <John.Koroll@tn.gov>
Cc: Marie LaLonde <Marie.Lalonde@talosep.com>
Subject: [EXTERNAL] RE: 59-0090 Talos APC 107

***** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. *****

John,

Hope you are having a good day. Attached is the updated form with section 13 filed out. I was not sure how to answer the last two boxes in that section. I also attached our log sheet we are using at the paint line. Right now, we have an order that will require painting every day for a couple of weeks, once the order is completed the booth will set idle for several weeks if not months.

Mark R.

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



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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 Ryneearson <Mark.Ryneearson@talosep.com>
Subject: 59-0090 Talos APC 107

[EXTERNAL]

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

From: Mark Ryneearson <Mark.Ryneearson@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 Ryneearson

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



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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)] Talos Engineered Products LLC						2. Emission Source Reference Number 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.) 17' 9"		Height (ft.) 10' 0"		Depth (ft.) 22' 5"		Number of open sides 1
7. Method of spray:	Airless	Air atomized	Electrostatic			Overspray (Percent) 15%	Date purchased * ?
	☐	☒	Airless ☐	Disc ☐	Air atomized ☐		
8. Exhaust data:	Number of fans 1		Total horsepower 7.5			Total volume (CFM) 216.5	
9. Exhaust control:	None ☐	Waterwash ☐	Exhaust filters ☒	Baffle plates ☐	Adsorption ** ☐	Other (Describe)	
10. Exhaust stack data **	Diameter (Ft.) 4'	Height (Ft.) Above Grade 18' 5"		Flow (CFM) 216.5		Specify serial numbers that share this vent 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.)	Concentration	Average Emissions (Tons/Yr.)	Potential Emissions (Ton/Yr.)	Emissions Estimation Method Code *	Control Devices *	Control Efficiency %
Particulate matter (PM)								
Sulfur dioxide (SO ₂)								
Carbon monoxide (CO)			PPM					
Volatile organic compounds (VOC)	1.13	1.13	PPM	1.16	1.16			
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 Ryneerson	Title Safety Manager	Phone number with area code 804-301-0502