



**DEPARTMENT OF ENVIRONMENT AND CONSERVATION
TENNESSEE DIVISION OF AIR POLLUTION CONTROL
ANNUAL INSPECTION**

Facility No.: 64-0013

State Category: T5

Date Inspected: March 16, 2023

Company Name: Jack Daniel Distillery, Lem Motlow Proprietor, Inc.
Location address: Highway 50, Highway 55 & Highway 129
City/State/Zip: Lynchburg, TN 37352

All Inspection Participants: Hattie Benet (APC Inspector; 931-840-4159)
Donna Clark (Manager of Environmental Compliance; 931-759-6116)
Theresa Ervin (Senior Environmental Specialist; 931-759-6116)

Time period covered by this inspection, from: December 10, 2021 **to:** March 16, 2023

Did the Division issue a Notice of Violation (NOV) since the last inspection? ☐ YES ☒ NO

If YES, enter data below.

Violation(s) Description	NOV Date	Issued By (Environmental Field Office, Compliance Validation, Permitting)	Has the violation been addressed by NFA or Order issuance? (yes/no)
N/A	N/A	N/A	N/A

Field Services inspection compliance status for entire time period covered: ☒ IN ☐ OUT

(The status will be "Out" if the facility was issued an NOV by Field Services personnel anytime during the inspection timeframe. The inspector will explain the "Out" status in the comments section. If an NOV was included in the previous inspection report, the inspector will not include it in this report.)

Comments: N/A

Description of Facility Operations:

Jack Daniel Distillery, facility 64-0013 consists of the barrel filling, storage for maturation, barrel dumping, processing, and bottling of distilled spirits.

Installation Description:

64-0013-01: Natural Gas/No. 2 Oil Fired Boilers
64-0013-03: Barrel filling, maturation warehouses, and barrel dumping for Tracts I, II, and III
64-0013-04: Processing and bottling operations
64-0013-12: Eleven (11) fuel oil-fired boilers with propane as back-up, each rated at 5.773 MMBtu.

Review Status of Required Reports:

Include all reports due/reviewed since last Inspection report

Report Tracking Number	Report Type	Report End Date	Due Date	Postmark	Received	Received in EFO	Acknowledged (last review date)	Report Adequate (Y/N) if N, explain below
65003	Semi-Annual	9-30-2022	11-29-2022	10-20-2022	10-20-2022	10-20-2022	10-21-2022	Yes
61048	Semi-Annual	3-31-2022	5-30-2022	4-11-2022	4-11-2022	4-11-2022	4-18-2022	Yes
56735	Annual	3-31-2022	5-30-2022	4-11-2022	4-11-2022	4-11-2022	4-18-2022	Yes

Comments: N/A

Permit Status:

Permit Number	Source Number(s)	Issue/Amendment/Modification Date	Expiration Date	Next Application Due Date	Next Application Received Date
572445	01, 03, 04, 12	Issued: 06-07-2018 Amendment 1: 01-09-2020	06-06-2023	12-08-2022	N/A

Comments: N/A

**TENNESSEE AIR POLLUTION CONTROL BOARD
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-1531**



ADMINISTRATIVE AMENDMENT #1 TO:

OPERATING PERMIT (TITLE V) Issued Pursuant to Tennessee Air Quality Act

This permit fulfills the requirements of Title V of the Federal Clean Air Act (42 U.S.C. 7661a-7661e) and the federal regulations promulgated thereunder at 40 CFR Part 70. (FR Vol. 57, No. 140, Tuesday, July 21, 1992 p.32295-32312). This permit is issued in accordance with the provisions of paragraph 1200-03-9-.02(11) of the Tennessee Air Pollution Control Regulations. The permittee has been granted permission to operate an air contaminant source in accordance with emissions limitations and monitoring requirements set forth herein.

Date Issued: June 7, 2018
Date Amended: January 9, 2020
Date Expires: June 6, 2023

Permit Number:
572445

Issued To:
Jack Daniel Distillery, Lem Motlow Proprietor (JDD Prop)
CN-0844 (Rev. 9-06)

Installation Address:
1926 Fayetteville Highway
RDA 1298

Installation Description:

Wholesale Distribution of Distilled Spirits

64-0013-01: Natural Gas/No. 2 Oil Fired Boilers (oil fired boilers are subject to Area Source Boiler MACT Subpart JJJJJ)

64-0013-03: Barrel filling, maturation warehouses, and barrel dumping for Tracts I, II, and III

64-0013-04: Processing and bottling operations

64-0013-12: Eleven (11) fuel oil-fired boilers with propane as back-up, each rated at 5.773 MMBtu, to provide heat for Whiskey maturation warehouses and fire protection systems during winter months. Subject to Area Source Boiler MACT Subpart JJJJJ

Emission Source Reference No.: 64-0013

Primary SIC: 51

Renewal Application Due Date: Between: September 9, 2022 and December 8, 2022.

Information Relied Upon:

Renewal Application Dated January 13, 2017

Revision application dated April 9, 2018

Administrative Amendment request dated October 23, 2019

(Continued on the next page)


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.

POST AT INSTALLATION ADDRESS

SECTION E

**SOURCE SPECIFIC EMISSION STANDARDS, OPERATING LIMITATIONS, and MONITORING,
RECORDKEEPING AND REPORTING REQUIREMENTS**

64-0013	<u>Source Description:</u>	Wholesale distribution of distilled spirits including barrel filling, maturation warehouses, barrel dumping, and processing & bottling operations, and boilers are also associated with this facility.
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Conditions E1, E2, and E3-1 through E3-8 apply to all sources in Section E of this permit unless otherwise noted.

E1. Fee payment: Allowable emissions basis.

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 64-0013

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	7.04	N/A	
PM ₁₀	N/A	N/A	
SO ₂	226	N/A	

VOC	11091.7	N/A	
NO _x	76.3	N/A	
CATEGORY OF MISCELLANEOUS HAZARDOUS AIR POLLUTANTS (HAP WITHOUT A STANDARD)*			
VOC FAMILY GROUP	N/A	N/A	N/A
NON-VOC GASEOUS GROUP	N/A	N/A	N/A
PM FAMILY GROUP	N/A	N/A	N/A
CATEGORY OF SPECIFIC HAZARDOUS AIR POLLUTANTS (HAP WITH A STANDARD)**			
VOC FAMILY GROUP	N/A	N/A	N/A
NON-VOC GASEOUS GROUP	N/A	N/A	N/A
PM FAMILY GROUP	N/A	N/A	N/A
CATEGORY OF NSPS POLLUTANTS NOT LISTED ABOVE***			
EACH NSPS POLLUTANT NOT LISTED ABOVE	N/A	N/A	

NOTES

AAP The **Annual Accounting Period (AAP)** is a twelve (12) consecutive month period that **either (a) begins each July 1st and ends June 30th of the following year when fees are paid on a fiscal year basis, or (b) begins January 1st and ends December 31st of the same year when paying on a calendar year basis.** The **Annual Accounting Period** at the time of renewal permit issuance **began July 1, 2017 and ends June 30, 2018.** The next Annual Accounting Period begins **July 1, 2018** and ends **June 30, 2019** unless a request to change the annual accounting period is submitted by the responsible official as required by subparagraph 1200-03-26-.02(9)(b) and approved by the Technical Secretary. If the permittee wishes to revise their annual accounting period or their annual emission fee basis as allowed by subparagraph 1200-03-26-.02(9)(b), the responsible official must submit the request to the Division in writing on or before December 31 of the annual accounting period for which the fee is due. If a change in fee basis from allowable emissions to actual emissions for any pollutant is requested, the request from the responsible official must include the methods that will be used to determine actual emissions.

N/A N/A indicates that no emissions are specified for fee computation.

AEAR **AEAR** indicates that an **Actual Emissions Analysis** is **Required** to determine the actual emissions of:

- (1) **each regulated pollutant** (Particulate matter, SO₂, VOC, NO_x and so forth. See TAPCR 1200-03-26-.02(2)(i) for the definition of a regulated pollutant.),
- (2) **each pollutant group** (VOC Family, Non-VOC Gaseous, and Particulate Family), and
- (3) the **Miscellaneous HAP Category** under consideration during the **Annual Accounting Period.**
- (4) **There are currently no significant amounts of HAPs at this facility thus, AEAR is not needed.**

***** **Category Of Miscellaneous HAP (HAP Without A Standard):** This category is made-up of hazardous air pollutants that do not have a federal or state standard. Each HAP is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation**, the **Miscellaneous HAP Category** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

****** **Category Of Specific HAP (HAP With A Standard):** This category is made-up of hazardous air pollutants (HAP) that are subject to Federally promulgated Hazardous Air Pollutant Standards that can be imposed under Chapter 1200-03-11 or Chapter 1200-03-31. Each individual hazardous air pollutant is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation**, each individual hazardous air pollutant of the **Specific HAP Category** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

******* **Category Of NSPS Pollutants Not Listed Above:** This category is made-up of each New Source Performance Standard (NSPS) pollutant whose emissions are not included in the **PM, SO₂, VOC or NO_x**

emissions from each source in this permit. **For fee computation**, each **NSPS pollutant not listed above** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

END NOTES

The permittee shall:

- (1) Pay Title V **annual emission fees**, on the emissions and year bases requested by the responsible official and approved by the Technical Secretary, for each annual accounting period (AAP) by the payment deadline(s) established in TAPCR 1200-03-26-.02(9)(g). Fees may be paid on an **actual, allowable, or mixed** emissions basis; and on either a **state fiscal year** or a **calendar year**, provided the requirements of 1200-03-26-.02(9)(b) are met. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within fifteen (15) days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8).
- (2) Sources paying annual emissions fees on an allowable emissions basis: pay annual allowable based emission fees for each annual accounting period pursuant to TAPCR 1200-03-26-.02(9)(d).
- (3) Sources paying annual emissions fees on an actual emissions basis: prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
 - (a) the completed **Fee Emissions Summary Table**,
 - (b) each **actual emissions analysis** required, and
 - (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. These calculations must be based on the annual fee basis approved by the Technical Secretary (a state fiscal year [July 1 through June 30] or a calendar year [January 1 through December 31]). These records shall be used to complete the **actual emissions analyses** required by the above **Fee Emissions Summary Table**.
- (4) Sources paying annual emissions fees on a mixed emissions basis: for all pollutants and all sources for which the permittee has chosen an actual emissions basis, prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
 - (a) the completed **Fee Emissions Summary Table**,
 - (b) each **actual emissions analysis** required, and
 - (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. These calculations must be based on the fee bases approved by the Technical Secretary (payment on an actual or mixed emissions basis) and payment on a state fiscal year (July 1 through June 30) or a calendar year (January 1 through December 31). These records shall be used to complete the **actual emissions analysis**.For all pollutants and all sources for which the permittee has chosen an allowable emissions basis, pay allowable based emission fees pursuant to TAPCR 1200-03-26-.02(9)(d).
- (5) When paying on an actual or mixed emissions basis, submit the **actual emissions analyses** at the time the fees are paid in full.

The annual emission fee due dates are specified in TAPCR 1200-03-26-.02(g) and are dependent on the Responsible Official's choice of fee bases as described above. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within fifteen (15) days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8). Emissions for regulated pollutants shall not be double counted as specified in Condition A8(d) of this permit.

Payment of the fee due and the actual emissions analysis (if required) shall be submitted to The Technical Secretary at the following address:

Payment of Fee to:

Actual Emissions Analyses to:

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The Tennessee Department of Environment and Conservation
 Division of Fiscal Services
 Consolidated Fee Section – APC
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 10th Floor
 Nashville, Tennessee 37243

The Tennessee Department of Environment and Conservation

Division of Air Pollution Control
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 15th Floor
 Nashville, Tennessee 37243

or

An electronic copy (PDF) of actual emissions analysis can also be submitted to: apc.inventory@tn.gov

Comments: As of the date of this inspection, this facility is current with the APC Fees section.

E2(AA1). Reporting requirements.

(a) Semiannual reports.

In order to maintain the same reporting schedule as established in the 2nd Title V permit renewal, the first report for this 3rd renewal shall cover the following permits and time periods:

Permit	Report period begins	Report period ends
561883 (2 nd renewal)	April 1, 2018	June 6, 2018
572445 (3 rd renewal)	June 7, 2018	September 30, 2018

The report covering the full 6 month period shall be submitted within 60 days after **September 30, 2018**. Subsequent reports revert fully to permit #572445 and shall be submitted within 60 days after the end of each 6-month period following the first report. Semiannual periods continue to cover the periods October through March and April through September. All instances of deviations from permit requirements must be clearly identified in these reports and the reports must be certified by a responsible official.

These semiannual reports shall include:

- (1) Reports of any monitoring, recordkeeping, and calculated emission limit required by Conditions E4-2, E5-1, E6-1, and E9-2 of this permit. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (2) The visible emission evaluation readings from Condition **E3-1** of this permit if required. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (3) Identification of all instances of deviations from **ALL PERMIT REQUIREMENTS**.

These reports must be certified by a responsible official consistent with Condition B4 of this permit and shall be submitted to The Technical Secretary at the Environmental Field Office address below. In lieu of mailing a hard copy of the report, the permittee may submit an electronic copy of the report to the email address below.

Columbia Environmental Field Office Division of Air Pollution Control 1421 Hampshire Pike Columbia, TN 38401	OR	Or by email to: APC.ColuEFO@tn.gov
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TAPCR 1200-03-09-.02(11)(e)1.(iii)

(b) Annual compliance certification.

The permittee shall submit annually compliance certifications with terms and conditions contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

- (1) The identification of each term or condition of the permit that is the basis of the certification;

- (2) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; Such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;
- (3) The status of compliance with each term or condition of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in E2(b)2 above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion* or exceedance** as defined below occurred; and
- (4) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

* Excursion shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

** Exceedance shall mean a condition detected by monitoring, when such monitoring provides data in terms of an emission limitation or standard and indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

The first certification since the issuance of this permit renewal shall cover the 12-month period from April 1, 2018 to March 31, 2019 and shall be submitted within 60 days after the 12-month period ending March 31, 2019. Subsequent certifications shall be submitted within 60 days after the end of each 12-month period following the first certification.

These certifications shall be submitted to: TN APCD and EPA

The Technical Secretary
Division of Air Pollution Control
Columbia Environmental Field Office
1421 Hampshire Pike
Columbia, TN 38401

and

Air Enforcement and Toxics Branch
US EPA Region IV
61 Forsyth Street, SW
Atlanta, Georgia 30303

Or E-mail: APC.ColuEFO@tn.gov

(c) MACT subpart JJJJJ reporting.

The permittee shall comply with all applicable notifications, compliance, recordkeeping and reporting required by 40 CFR Part 63 subpart JJJJJ as identified but not limited to Conditions **E4-4** through **E4-12** and **E9-4** through **E9-12** of this permit.

Reports, if requested per Conditions E4-11 and E9-11, must be certified by a responsible official consistent with Condition B4 of this permit and shall be submitted to The Technical Secretary at the address below. In lieu of mailing a hard copy of the report, the permittee may submit an electronic copy of the report to the email address below.

Division of Air Pollution Control William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Avenue, 15th Floor Nashville, Tennessee 37243	OR	by email to: Air.Pollution.Control@tn.gov
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40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol.79, No.144, July 28, 2014, pages 43661 and 43667

- (d) **Retention of Records** All records required by any condition in Section E of this permit must be retained for a period of not less than five years. Additionally, these records shall be kept available for inspection by the Technical Secretary or a Division representative.

TAPCR 1200-03-09-.02(11)(e)1.(iii)(II)II

Comments: Records are retained as required. All reports were received on time and deemed adequate (see review of required reports table above).

E3. General requirements applicable to permitted facility.

- E3-1.** Visible emissions from any source at this facility 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 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)

Compliance Method: Compliance with this opacity limitation shall be certified through utilization of the Division's Opacity Matrix dated June 18, 1996, amended September 11, 2013, using EPA Method 9 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

Comments: No visible emissions were observed from this facility during the inspection. Visible emissions evaluations are not required for any source at this facility per the opacity matrix. Therefore, no readings were performed.

E3-2. Records retention

Any records used to establish VOC emissions, fuel use, and sulfur content of the fuel oil, as well as all reports, notification required by 40 CFR Part 63 Subpart JJJJJ (Conditions **E4-4** through **E4-12** and **E9-4** through **E9-12** shall be maintained on site and shall be made available for inspection by the Technical Secretary or his representative upon request. These records shall be retained for a period of at least 5 years.

Comments: Records are retained as required.

- E3-3.** This permit #572445 represents the third renewal of the original Title V permit (#547988) issued on October 5, 2000 and all the subsequent permit revisions made since the second Title V permit (# 561883) renewal that was issued on July 17, 2012. The revisions are summarized below (next page in a tabular form).

Comments: Informational condition only.

E3-4. Identification of Responsible Official, Technical Contact, and Billing Contact

- (a) The applications that were utilized in the preparation of this permit are dated January 13, 2017 and revision application dated April 9, 2018 and signed by Danny A. Lamb, VP Assistant General Manager of the permitted facility. If this person terminates his/her employment or is assigned different duties such that he/she is no longer a Responsible Official for this facility as defined in part 1200-03-09-.02(11)(b)21 of the Tennessee Air Pollution Control Regulations, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty (30) days of the change. The notification shall include the name and title of the new Responsible Official and certification of truth and accuracy. All representations, agreement to terms and conditions, and covenants made by the former Responsible Official that were used in the establishment of the permit terms and conditions 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/or covenants.
- (b) The applications that were utilized in the preparation of this permit are dated January 13, 2017 and revision application dated April 9, 2018 and identifies Donna C. Clark, Manager of Environmental Compliance as the Principal Technical Contact for the permitted facility. If this person terminates his/her employment or is assigned different duties such that he/she is no longer the Principal Technical Contact for this facility, the

owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty (30) days of the change. The notification shall include the name and title of the new Principal Technical Contact and certification of truth and accuracy.

- (c) The applications that were utilized in the preparation of this permit are dated January 13, 2017 and revision application dated April 9, 2018 and identifies Donna C. Clark, Manager of Environmental Compliance, as the Billing Contact for the permitted facility. If this person terminates his/her employment or is assigned different duties such that he/she is no longer the Billing Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty (30) days of the change. The notification shall include the name and title of the new Billing Contact and certification of truth and accuracy.

Date of Request	Type of Request	Affected Sources	Capacity (mmBtu/hr)	Type	Date Issued
12/28/2012	Minor. Mod #1	64-0013-01	@5.773	Addition of two new #2 oil fired boilers, (boilers WH3-16 and WH3-17)	April 2, 2013
5/9/2014	Minor. Mod #2	64-0013-04		Infrastructure projects: installation of new equipments and modernization of existing equipment with production increase in processing and bottling operations.	December 22, 2014
8/26/2013 and 4/2/2015	Minor. Mod #3	64-0013-01	@5.773	Addition of three new #2 oil fired boilers, (boilers WH3-18 and WH3-19)	May 14, 2015
1/9/2015 and 2/17/2015	Minor. Mod #4	64-0013-01	@5.773	Addition of three new #2 oil fired boilers, (boilers WH3-20, WH3-21 and WH3-22)	5/28/2015
9/10/2015	Sig. Mod #1	64-0013-09		Addition of eleven new #2 oil-fired boilers and eighteen (18) new emergency diesel engines with generator	
10/31/2016	Minor Mod #5	64-0013-10		Five diesel-fired emergency fire pump engines (now deemed insignificant)	

Compliance Method: None. This is for informational purposes only.

Comments: A letter dated April 25, 2019, was received alerting that Melvin Keebler had replaced Danny Lamb as responsible person. Melvin Keebler is currently a responsible person and Donna Clark is currently the Technical and Billing Contact.

E3-4. The permittee is not required to file an accidental release plan pursuant to Section 112(r) of the Clean Air Act and 1200-03-32 of TAPCR.

Compliance Method: Following the requirement as identified in TAPCR 1200-03-32.

Comments: Informational condition only.

E3-5. Logs and records specified in this permit shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative and shall be retained for a period of not less than five (5) years unless otherwise noted. Logs and records contained in this permit are based on a recommended format. Any logs that have an alternative format may be utilized provided such logs contain the same or equivalent information that is required. Computer-generated logs are also acceptable. Logs and records are not required to be submitted semiannually

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unless specified in Condition **E2(a)(1)**. All Logs, computer-generated or manually-generated, submitted and maintained at the facility shall be legible

Tenn. Comp. R. & Regs. 1200-03-10-.02(2)(a)

Compliance Method: Included with the requirement.

Comments: Logs and records are retained and made available as required.

E3-6. Record keeping requirements for the permittee, including all data and calculations, must be updated and maintained based on the following schedule:

- 1) For monthly recordkeeping, all data, including the results of all calculations, must be entered into the log no later than thirty (30) days from the end of the month for which the data is required.
- 2) For weekly recordkeeping, all data, including the results of all calculations, must be entered into the log no later than seven (7) days from the end of the week for which the data is required.
- 3) For daily recordkeeping, all data, including the results of all calculations, must be entered into the log no later than seven (7) days from the end of the day for which the data is required.
- 4) All maintenance activities (including any ongoing maintenance that has not been completed) shall be entered in the maintenance log no later than thirty (30) days following the start of the maintenance.

TAPCR 1200-03-09

Compliance Method: Maintain the recordkeeping schedule as required.

Comments: Records are updated and maintained as required.

E3-7. The permittee is not currently subject to regulations under 40 CFR part 64 (Compliance Assurance Monitoring).

Comments: Informational condition only.

E3-8. List of new sources (emergency engines and gasoline dispensing facility) deemed Insignificant with this renewal Title V permit:

- a) Eighteen (18) emergency diesel engines each with a generator, as listed below (previously source 64-0013-09) under insignificant activity per Tenn. Comp. R. & Regs. 1200-03-09-.04(5)(f)37.

Location	Engine Manufacturer	Model No	Horsepower (Hp) / Kilowatt(kW)
WH 2-50	Cummins	DKAC-5778846	20.1(15)
WH 2-51	Cummins	DKAE-5790072	15.4 (11.5)
WH 2-52	Cummins	DSKBA-6913870	15.4 (11.5)
WH 2-53	Cummins	DSKBA-6913870	20.1 (15)
WH 2-54	Cummins	DKAC-5778846	20.1(15)
WH 3-10	Cummins	DKAE-5790072	26.8 (20)
WH 3-11	Cummins	DSKBA-6913870	26.8 (20)
WH 3-12	Cummins	DSKBA-6913870	26.8 (20)
WH 3-13	Onsite Energy	DS000030D6SPTK0664	40 (30)
WH 3-14	Onsite Energy	DS000030D6SPTK0665	40 (30)
WH 3-15	Onsite Energy	DS000030D6SPTK0666	40 (30)
WH 3-16	Clarke	30D-JSMP-LAE	43(30)
WH 3-17	Clarke	30D-JSMP-LAE	43 (30)
WH 3-18	Clarke	30D-JSMP-LAE	43(30)
WH 3-19	Clarke	30D-JSMP-LAE	43 (30)

WH 3-20	Clarke	30D-JSMP-LAE	43 (30)
WH 3-21	Clarke	30D-JSMP-LAE	43 (30)
WH 3-22	Cummins	C30 D6	43 (30)

WH - warehouse

These emergency diesel-fired IC engines each with a generator shall comply with all federally enforceable requirements that apply to all of the listed emission units or activities (emergency engines) including 40 CFR Part 60 Subpart IIII/JJJJ & 40 CFR Part 63 Subpart ZZZZ (as applicable), and without reference to specific types of emission units or activities per Tenn. Comp. R. & Regs. 1200-03-09-.04(2)(c); Tenn. Comp. R. & Regs. 0400-30-38 and Tenn. Comp. R. & Regs. 0400-30-39

- b) Five (5) emergency Fire Pump diesel engines, as listed below (previously source 64-0013-10) under insignificant activity per Tenn. Comp. R. & Regs. 1200-03-09-.04(4)(d)12.

Location	Horsepower Hp	Year of Manufacture
WH 1-01	208	1996
Coy Hill #3	305	1997
Coy Hill #4	305	1997
Tract III	350	2011
Tract III	350	2011

These emergency diesel-fired IC fire pump engines shall comply with all federally enforceable requirements that apply to all of the listed emission units or activities (emergency engines) including 40 CFR Part 60 Subpart IIII/JJJJ & 40 CFR Part 63 Subpart ZZZZ (as applicable), and without reference to specific types of emission units or activities per Tenn. Comp. R. & Regs. 1200-03-09-.04(2)(c); Tenn. Comp. R. & Regs. 0400-30-38 and Tenn. Comp. R. & Regs. 0400-30-39

- c) One 6000 gallon aboveground gasoline storage tank and fuel dispensing equipment (previously source 64-0013-11) listed under insignificant activity per Tenn. Comp. R. & Regs. 1200-03-09-.04(5)(f)37.

This storage tank shall comply with all federally enforceable requirements that apply to all of the listed emission units or activities (emergency engines) without reference to specific types of emission units or activities per Tenn. Comp. R. & Regs. 1200-03-09-.04(2)(c) and Division Rule 0400-30.

Comments: Informational condition only.

Source Specific Emission Standards:

E4. 64-0013-01 Fuel burning sources

64-0013-01 This source consists of the following boilers.					
Number of Units	Boilers I.D.	Heat input in MMBtu/hr	Primary Fuel	Back-up fuel	Status
1	Boiler # 5	8.5	Natural gas	No. 2 fuel oil	Existing source
1	WH 2-50/2-51	4.47	Natural gas	No. 2 fuel oil	Existing source*
1	WH2-52	2.653	Natural gas	No. 2 fuel oil	Existing source*
1	WH2-53	3.68	Natural gas	No. 2 fuel oil	Existing source*
1	WH2-54	3.68	Natural gas	No. 2 fuel oil	Existing source*
1	BYO	2.887	Natural gas	No. 2 fuel oil	Existing source*
2	WH 3-10A,10B	3.103	No. 2 fuel oil	Propane	These boilers are considered new as of June 12, 2012 with an initial notification due to conversion fuel from gas to #2 oil. These boilers are subject to 40 CFR 63 subpart JJJJJ.

1	WH 3-11	5.773	No. 2 fuel oil	Propane	Existing source subject to 40 CFR 63 subpart JJJJJ
1	WH 3-12	5.773	No. 2 fuel oil	Propane	Existing source subject to 40 CFR 63 subpart JJJJJ
1	WH 3-13	5.773	No. 2 fuel oil	Propane	New source subject to 40 CFR 63 subpart JJJJJ
1	WH 3-14	5.773	No. 2 fuel oil	Propane	New source subject to 40 CFR 63 subpart JJJJJ
1	WH 3-15	5.773	No. 2 fuel oil	Propane	New source subject to 40 CFR 63 subpart JJJJJ
1	WH 3-16	5.773	No. 2 fuel oil	Propane	New source subject to 40 CFR 63 subpart JJJJJ
1	WH 3-17	5.773	No. 2 fuel oil	Propane	New source subject to 40 CFR 63 subpart JJJJJ
2	WH 3-18 and WH 3-19	5.773 each	No. 2 fuel oil	Propane	New source subject to 40 CFR 63 subpart JJJJJ
*WH = Warehouses					

*The following existing natural gas fired boilers with #2 fuel oil as back up are not subject to 40 CFR Subpart JJJJJ. Refer to page 1-6 of the renewal Title V application and per 40 CFR Subpart JJJJJ §63.11195(e) and §63.11237.

Boiler	Heat input in MMBtu/hr	Type of Fuel	Back-up fuel
1 (Boiler # 5)	8.5	Natural gas	No. 2 fuel oil
1 (WH 2-50/2-51)	4.47	Natural gas	No. 2 fuel oil
1 (WH2-52)	2.653	Natural gas	No. 2 fuel oil
1 (WH2-53)	3.68	Natural gas	No. 2 fuel oil
1 (WH2-54)	3.68	Natural gas	No. 2 fuel oil
1 (BYO)	2.887	Natural gas	No. 2 fuel oil

Conditions E4-1 through E4-12 apply to Emission Source 64-0013-01

E4-1. Particulate matter emitted from boilers listed below shall not exceed the respective lb/hr limits (total 1.22 lb/hr). The PM allowable tonnage from these sources totals 5.34 tons during all periods of twelve consecutive months and is based on the agreement letters summarized in the table below:

TAPCR 1200-03-06-.01(7).

Source No. of Boilers	Heat Input Rate MMBtu/hr	PM Allowable Limits		Applicable Rule	Comments
		Agreement	lb/hr		
One (boiler # 5)	8.5	Agreement	0.12	1200-03-06-.01(7)	Agreement letter dated February 9, 2007
One boiler WH 2-50/2-51	4.47	Agreement	*0.07	1200-03-06-.01(7)	Per Cond. C1-2(b) of Minor Mod #1 of Title V # 547988, A/L, March 12, 2002
One boiler WH 2-52	2.653	Agreement	*0.09	1200-03-06-.01(7)	Per Cond. C1-2(b) of Minor Mod #1 of Title V # 547988, A/L, March 12, 2002
Two Boilers (BYO & WH2-53)	3.68 + 2.88 = 6.56 (total)	Agreement	0.09 (total)	1200-03-06-.01(7)	Minor Modification #2 Agreement letter dated June 1, 2006.
One (New N.G) WH 2-54	3.68	Agreement	0.05	1200-03-06-.01(7)	Agreement letter dated February 20, 2007
Two (#2 fuel oil) WH 3-10A & 3-10B	3.103 (each)	Agreement	0.04 each (0.08 total)	1200-03-06-.01(7)	Agreement letter dated February 20, 2007

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One WH 3-11 (#2 fuel oil)	5.773	Agreement	0.08	1200-03-06-.01(7)	Agreement letter dated May 25-2011
One WH 3-12 (#2 fuel oil)	5.773	Agreement	0.08	1200-03-06-.01(7)	Agreement letter dated May 25, 2011
One WH 3-13 (#2 fuel oil)	5.773	Agreement	0.08	1200-03-06-.01(7)	Agreement letter dated December 22, 2011
One WH 3-14 (#2 fuel oil)	5.773	Agreement	0.08	1200-03-06-.01(7)	Agreement letter dated December 22, 2011
One WH 3-15 (#2 fuel oil)	5.773	Agreement	0.08	1200-03-06-.01(7)	Agreement letter dated December 22, 2011
One WH 3-16 (#2 fuel oil)	5.773	Agreement	0.08	1200-03-06-.01(7)	Agreement letter dated December 28, 2012
One WH 3-17 (#2 fuel oil)	5.773	Agreement	0.08	1200-03-06-.01(7)	Agreement letter dated December 28, 2012
Two Boilers WH 3-18 and WH 3-19	5.773 each	Agreement	@0.08 (0.16 total)	1200-03-06-.01(7)	Agreement letter dated August 26, 2013
<p>* Prior to Minor Modification #3, 0.25 lb/hr of PM emissions was for one 4.4 MMBtu/hr + four 2.653 MMBtu/hr (each), total of five boilers. Minor Modification #3 requested two of the four 2.653 MMBtu/hr boilers to be removed. PM allowable was adjusted accordingly. As per Revised Title V application cover sheet dated February 6, 2012, permittee discovered "barrel rinse boiler (Boiler #9 with capacity of 2.653 mmBtu/hr)" is tied to non-interruptible natural gas line and there is no piping or hookup to run the boiler on #2 fuel oil.</p>					

Compliance Method: Compliance shall be assured by using the current EPA AP-42 emission factors for each category of fuel (natural gas, No.2 fuel oil, propane) used on the relevant boilers listed in the Condition **Error! Reference source not found.** A monthly log of fuels used in these boilers shall be maintained on site and shall be made available for inspection by the Technical Secretary or a Division representative and shall be retained for a period of at least five (5) years.

Comments: Records are maintained and retained as required.

Type of Review: ☒ Full ☐ Spot

November 2021 through January 2023

E4-2. Sulfur dioxide emitted from boilers listed below shall not exceed the respective lb/hr limits (42.67 lbs/hr total) nor 186.89 tons during all periods of twelve consecutive months based on heat input capacity fire rate and a maximum sulfur content of 0.5% by weight, as itemized in the table below:

Source No. of Boilers	Heat Input Rate MMBtu/hr	Allowable Limits		Applicable Rule	Comments
			lb/hr		
One boiler B#5	8.5	Agreement	4.3	1200-03-14-.01(3)	Agreement letter dated July 25, 2000
One boiler WH 2-50/2-51	4.47		*2.28	1200-03-14-.01(3)	Per Cond. C1-3(b) of Minor Mod #1 of Title V # 547988. Agreement letter dated March 12, 2002
One boiler WH 2-52	2.653	Agreement	1.36	1200-03-14-.01(3)	Per Cond. C1-3(b) of Minor Mod #1 of Title V #547988. Agreement letter dated March 12, 2002.
Two Boilers WH 2-53 & BYO	3.68 + 2.88 = 6.56 (total)	Agreement	3.34 (total)	1200-03-14-.01(3)	Minor Modification #2 (permit 556305). Agreement letter dated June 1, 2006
One (New N.G) WH 2-54	3.68	Agreement	1.87	1200-03-14-.01(3)	Minor Modification #3. (permit 556305). Agreement letter dated February 20, 2007
Two (#2 fuel oil) WH 3-10 A & WH 3-10 B	3.103 (each)	Agreement	1.53 each (3.06 total)	1200-03-14-.01(3)	Minor Modification #3. (permit 556305). Agreement letter dated February 20, 2007

Annual Inspection

One WH 3-11 (#2 fuel oil)	5.773	Agreement	2.94	1200-03-14-.01(3)	Agreement letter dated May 25, 2011.
One WH 3-12 (#2 fuel oil)	5.773	Agreement	2.94	1200-03-14-.01(3)	Agreement letter dated May 25, 2011.
One WH 3-13 (#2 fuel oil)	5.773	Agreement	2.94	1200-03-14-.01(3)	Agreement letter dated December 22, 2011
One WH 3-14 (#2 fuel oil)	5.773	Agreement	2.94	1200-03-14-.01(3)	Agreement letter dated December 22-2011
One WH 3-15 (#2 fuel oil)	5.773	Agreement	2.94	1200-03-14-.01(3)	Agreement letter dated December 22, 2011.
One WH 3-16 (#2 fuel oil)	5.773	Agreement	2.94	1200-03-14-.01(3)	Agreement letter dated December 28, 2012.
One WH 3-17 (#2 fuel oil)	5.773	Agreement	2.94	1200-03-14-.01(3)	Agreement letter dated December 28, 2012.
Two Boilers (#2 fuel oil) WH 3-18 & WH 3-19	5.773 each	Agreement	2.94 each (5.88 both)	1200-03-06-.01(7)	Agreement letter dated August 26, 2013

* Prior to Minor Modification #3 (previous Title V permit #556305), 7.7 lb/hr of sulfur dioxide emissions was for one 4.4 MMBtu/hr + four 2.653 MMBtu/hr (each), total of five boilers. Minor Modification #3 requested two of the four 2.653 MMBtu/hr boilers to be removed. SO₂ allowable was adjusted accordingly.

Compliance Method: Compliance shall be assured by using the EPA AP-42 emission factor at 0.5% sulfur content by weight at maximum fire rate of the boiler for distillate oil. For each shipment of oil utilized in the boiler, documentation shall be supplied which contains information sufficient to establish the sulfur content of the fuel oil. This may include vendor analysis, MSDS, fuel oil specification data, or similar information, which stipulates the sulfur content of the fuel oil. This information shall be submitted and reported for the semiannual period in which the oil is utilized in these boilers. This shall be reported in accordance with Condition **E2 (a)(1)** and maintained according to Condition **Error! Reference source not found.**

Comments: Sulfur content data is submitted with semiannual reports. Records are maintained and retained as required.

Type of Review: ☒ Full ☐ Spot

November 2021 through January 2023

- E4-3.** The following maximum actual emissions for gaseous pollutants from all boilers as indicated in Condition **Error! Reference source not found.** of this permit shall serve as allowable emissions for annual emissions fee purposes. These values are based on current AP-42 emission factors from No. 2 oil, natural gas and propane in accordance with each boiler usages as indicated in Condition **Error! Reference source not found.** of this permit. Should emission factors change during the period of this permit the values may be adjusted through an administrative amendment to the Title V Permit 572445.

Pollutant	lbs/hour	Tons/year
NO _x	12.5	54.7
VOC	0.52	2.3

Tenn. Comp. R. & Regs. 1200-03-26-.02 (2) (d) 3.

Comments: Emission factors have not changed.

E4-4. NESHAP for Boilers at Area Sources

Pursuant to 40 CFR 63.11193 (or subsequent revisions and or updated promulgation of the said Rule as applicable) the owner or operator of an industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195 is subject to 40 CFR Part 63 Subpart JJJJJ known as Area Source Boilers.

Compliance Method: None. This condition identifies that the permittee is subject to 40 CFR Part 63 Subpart JJJJJ.

Comments: Informational condition only.

E4-5. The affected sources by this subpart

Pursuant to 40 CFR § 63.11194(a) this subpart applies to each new, reconstructed, or existing affected source as defined in paragraphs (a)(1) and (2) of this section.

- (1) The affected source is the collection of all existing industrial, commercial, and institutional boilers within a subcategory (coal, biomass, oil), as listed in §63.11200 and defined in §63.11237, located at an area source.
- (2) The affected source of this subpart is each new or reconstructed industrial, commercial, or institutional boiler within a subcategory, as listed in §63.11200 and as defined in §63.11237, located at an area source.
- (b) An affected source is an existing source if the permittee commenced construction or reconstruction of the affected source on or before June 4, 2010.
- (c) An affected source is a new source if the permittee commenced construction or reconstruction of the affected source after June 4, 2010 and the permittee meets the applicability criteria at the time the permittee commences construction.
- (d) An affected source is a reconstructed source if the boiler meets the reconstruction criteria as defined in §63.2, you commenced reconstruction after June 4, 2010, and the boiler meets the applicability criteria at the time you commence reconstruction.
- (e) An existing dual-fuel fired boiler meeting the definition of gas-fired boiler, as defined in §63.11237, that meets the applicability requirements of this subpart after June 4, 2010 due to a fuel switch from gaseous fuel to solid fossil fuel, biomass, or liquid fuel is considered to be an existing source under this subpart as long as the boiler was designed to accommodate the alternate fuel.

As defined above the following fuel burning units at Jack Daniel Distillery, Lem Motlow Proprietor (JDD Prop) facility I.D number 64-0013 are subject to 40 CFR Part 63 Subpart JJJJJJ:

Fuel burning units I.D.	Heat Capacity (mmBtu/hr)	Primary fuel	Status
WH 3-10 A	3. 103	#2 fuel Oil	Existing Source
WH 3-10 B	3. 103	#2 fuel Oil	Existing Source
WH 3-11	5.773	#2 fuel Oil	New Source
WH 3-12	5.773	#2 fuel Oil	New Source
WH 3-13	5.773	#2 fuel Oil	New Source
WH 3-14	5.773	#2 fuel Oil	New Source
WH 3-15	5.773	#2 fuel Oil	New Source
WH 3-16	5.773	#2 fuel Oil	New Source
WH 3-17	5.773	#2 fuel Oil	New Source
WH 3-18	5.773	#2 fuel Oil	New Source
WH 3-19	5.773	#2 fuel Oil	New Source

Compliance Method: None. This condition identifies which fuel burning units are subject to 40 CFR Part 63 Subpart JJJJJJ.

Comments: Informational condition only.

E4-6. Pursuant to 40 CFR 63.11196 compliance dates

(a) The owner or operator of an existing affected boiler must achieve compliance with the applicable provisions in this subpart as specified in paragraphs (a)(1) of this section.

- (1) The **existing** affected boiler is subject to a work practice or management practice standard of a tune-up, the permittee must achieve compliance with the work practice or management standard no later than May 21, 2014.
- (b) If the permittee starts up a **new** affected source on or before May 20, 2011, the permittee must achieve compliance with the provisions of this subpart no later than May 20, 2011.
- (c) If the permittee starts up a new affected source after May 20, 2011, the permittee must achieve compliance with the provisions of this subpart upon startup of the affected source.

Compliance Method: Compliance shall be assured by achieving the requirement by specified dates for each affected source.

Comments: Informational condition only.

E4-7. Pursuant to 40 CFR 63.11225(a)(2) and 40 CFR 63.11225(b) submit an Initial Notification

As specified in Subpart A-General Provisions §63.9(b)(2), the permittee must submit the Initial Notification no later than January 20, 2014 or within 120 days after the source becomes subject to the standard. The Notification shall provide the following information:

1. The name and address of the owner or operator;
2. The address (i.e., physical location) of the affected source;
3. An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date;
4. A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and a statement of whether the affected source is a major source or an area source.

Compliance Method: Compliance shall be assured by submitting the Initial Notification on the specified dates to the **Technical Secretary, Division of Air Pollution Control** to the address as indicated in Condition E2(c) of this permit.

Comments: This facility submits an initial notification in accordance with 40 CFR 63.11225. (See complete table of dates in the table following condition E4-10.)

E4-8. Pursuant to 40 CFR 63.11225(a)(4) submit an Initial Notification of Compliance Status

The permittee must submit the **Notification of Compliance Status** in accordance with §63.9(h) no later than 120 days after the applicable compliance date specified in Condition **Error! Reference source not found.** [§63.11196]. The notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

- (i) "This facility complies with the requirements in Condition **Error! Reference source not found.** [§63.11214] to conduct an initial tune-up of the boiler."
- (ii) "This facility has had an energy assessment performed according to §63.11214(c)."
- (iii) You must submit the Notification of Compliance Status no later than 120 days after the applicable compliance date specified in §63.11196 unless you own or operate a new boiler subject only to a requirement to conduct a biennial or 5-year tune-up or you must conduct a performance stack test. If you own or operate a new boiler subject to a requirement to conduct a tune-up, you are not required to prepare and submit a Notification of Compliance Status for the tune-up. If you must conduct a performance stack test, you must submit the Notification of Compliance Status within 60 days of completing the performance stack test. You must submit the Notification of Compliance Status in accordance with paragraphs (a)(4)(i) and (vi) of this section. The Notification of Compliance Status must include the information and certification(s) of compliance in paragraphs (a)(4)(i) through (v) of this section, as applicable, and signed by a responsible official. §63.11225(a)(4)
- (iv) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."

Comments: This facility submits an initial compliance status reports in accordance with 40 CFR 63.11225. (See complete table of dates in the table following condition E4-10.)

E4-9. Pursuant to 40 CFR 63.11214(b), demonstrate initial compliance with the work practice standard, and management practice. If you own or operate an existing or new biomass-fired boiler or an existing or new oil-fired boiler, you must conduct a performance tune-up according to §63.11210(c) or (g), as applicable, and §63.11223(b). If you own or operate

an existing biomass-fired boiler or existing oil-fired boiler, you must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted an initial tune-up of the boiler.

Compliance Method: Compliance shall be assured by submitting a signed statement in the Notification of Compliance Status report (the company has already submitted their compliance status report). .

Comments: This facility conducts initial and performance tune-ups as required and submits initial compliance status reports in accordance with 40 CFR 63.11214. (See complete table of dates in the table following condition E4-10.)

E4-10. Pursuant to 40 CFR 63.11201, §63.11223(a) and §63.11223(b) to demonstrate continuous compliance with the work practice and management practice standards

The permittee must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in paragraphs §63.11223(b)(1) through (7) of this section.

- (1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (permittee may delay the burner inspection until the next scheduled unit shutdown, but the permittee must inspect each burner at least once every 36 months).
- (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
- (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).
- (4) Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available.
- (5) Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made. Measurements may be taken using a portable CO analyzer).
- (6) Maintain onsite and submit, if requested by the Administrator, a report containing the information in paragraphs (b)(6)(i) through (iii) of this section.
 - (i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured before and after the tune-up of the boiler.
 - (ii) A description of any corrective actions taken as a part of the tune-up of the boiler.
 - (iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
- (7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within one week of startup.

Compliance Method: Compliance shall be assured by achieving the requirements in this condition as described above and submitting (upon request) the certified and signed, biennial compliance report required by Condition **Error!**
Reference source not found. .

Comments: This facility submits the notification of compliance status report in accordance with 40 CFR 63.11201, 63.11223(a), and 63.11223(b) (refer to the table below for dates).

Number of Units	Boilers I.D.	Heat input in MMBtu/hr	Primary Fuel	Back-up fuel	
2	WH 3-10A, 10B	3.103	No. 2 fuel oil	Propane	Initial Compliance <u>06-12-2012</u> Compliance Status <u>06-12-2012</u> Initial Tune Up <u>04-25-2012</u> 5 Year Tune Up <u>01-10-2022</u>

1	WH 3-11	5.773	No. 2 fuel oil	Propane	Initial Compliance <u>01-09-2012</u> Compliance Status <u>06-12-2012</u> Initial Tune Up <u>10-28-2011</u> Biennial Tune Up <u>05-03-2022</u>
1	WH 3-12	5.773	No. 2 fuel oil	Propane	Initial Compliance <u>01-09-2012</u> Compliance Status <u>06-12-2012</u> Initial Tune Up <u>10-28-2011</u> Biennial Tune Up <u>05-03-2022</u>
1	WH 3-13	5.773	No. 2 fuel oil	Propane	Initial Compliance <u>06-12-2012</u> Compliance Status <u>06-12-2012</u> Initial Tune Up <u>03-06-2012</u> Biennial Tune Up <u>05-03-2022</u>
1	WH 3-14	5.773	No. 2 fuel oil	Propane	Initial Compliance <u>02-14-2013</u> Compliance Status <u>06-12-2012</u> Initial Tune Up <u>03-05-2012</u> Biennial Tune Up <u>05-04-2022</u>
1	WH 3-15	5.773	No. 2 fuel oil	Propane	Initial Compliance <u>02-14-2013</u> Compliance Status <u>06-12-2012</u> Initial Tune Up <u>03-05-2012</u> Biennial Tune Up <u>05-04-2022</u>
1	WH 3-16	5.773	No. 2 fuel oil	Propane	Initial Compliance <u>03-28-2013</u> Compliance Status <u>06-10-2014</u> Initial Tune Up <u>12-21-2012</u> Biennial Tune Up <u>05-04-2022</u>
1	WH 3-17	5.773	No. 2 fuel oil	Propane	Initial Compliance <u>03-28-2013</u> Compliance Status <u>06-10-2014</u> Initial Tune Up <u>12-21-2012</u> Biennial Tune Up <u>05-04-2022</u>
2	WH 3-18 and WH 3-19	5.773	No. 2 fuel oil	Propane	Initial Compliance <u>11-08-2013</u> Compliance Status <u>06-10-2014</u> Initial Tune Up <u>09-09-2015</u> Biennial Tune Up <u>10-05-2021</u>

E4-11. Pursuant to 40 CFR 63.11225(b) notification, reporting, and recordkeeping requirements

You must prepare, by March 1 of each year, and submit to the delegated authority upon request, an annual compliance certification report for the previous calendar year containing the information specified in paragraphs (b)(1) through (4) of this section. You must submit the report by March 15 if you had any instance described by paragraph (b)(3) of this section. For boilers that are subject only to the energy assessment requirement and/or a requirement to conduct a biennial or 5-year tune-up according to §63.11223(a) and not subject to emission limits or operating limits, you may prepare only a biennial or 5-year compliance report as specified in paragraphs (b)(1) and (2) of this section.

(1) Company name and address.

(2) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. Your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

(i) "This facility complies with the requirements in §63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler."

- (ii) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."
- (iii) "This facility complies with the requirement in §§63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."
- (3) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.
- (4) The total fuel use by each affected boiler subject to an emission limit, for each calendar month within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by you or EPA through a petition process to be a non-waste under §241.3(c), whether the fuel(s) were processed from discarded non-hazardous secondary materials within the meaning of §241.3, and the total fuel usage amount with units of measure.

Comments: This facility submits reports upon request and as otherwise required in accordance with 40 CFR 63.11225. No reports were requested during this inspection period.

- E4-12.** Pursuant to 40 CFR 63.1125(c)(2)(i) records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
- Pursuant to 40 CFR 63.11225(c)(2)(ii): For operating units that combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to §241.3(b)(1) of this chapter, you must keep a record which documents how the secondary material meets each of the legitimacy criteria under §241.3(d)(1). If you combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to §241.3(b)(4) of this chapter, you must keep records as to how the operations that produced the fuel satisfies the definition of processing in §241.2 and each of the legitimacy criteria in §241.3(d)(1) of this chapter. If the fuel received a non-waste determination pursuant to the petition process submitted under §241.3(c) of this chapter, you must keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust non-hazardous secondary materials as fuel per §241.4, you must keep records documenting that the material is a listed non-waste under §241.4(a).

Compliance Method: Compliance shall be assured by achieving the requirements in this condition.

Comments: Records are retained as required. Specifications for WH 3-10A, 10B were reviewed. No hazardous materials were combusted in any boiler during this inspection period.

Type of Review: ☐ Full ☒ Spot

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E5. 64-0013-03 Barrel Filling, Maturation Warehouses, and Barrel Dumping

64-0013-06, Tract I	Barrel Filling, Maturation Warehouses, and Barrel Dumping	New charred oak barrels are filled with white whiskey following gauging in the cistern of Jack Daniel Distillery Lem Motlow Proprietor, Inc. or Jack Daniel Distillery Lem Motlow Prop. VOC emissions occur when the vapors are displaced from the barrel headspace during filling and incidental spillage. The filled barrels are transported to one of 96 (ninety six) maturation warehouses. VOC emissions from the barrel contents are released through building openings, windows, doors, and by ventilation at the warehouses while stored for 4 or more years. Following maturation, the barrels are dumped prior to the processing and bottling operations. VOC emissions are released during dumping from the evaporation during exposure to the atmosphere. This involves Tracts I, II, and III. The whiskey may be stored in one of eleven (11) bulk outdoor storage tanks prior to gauging in Tract II.
64-0013-02, Tract II		
64-0013-08, Tract III		

Condition E5-1 applies to Emission Source **64-0013-03**

- E5-1.** Volatile organic compound (VOC) emissions combined from sources 64-0013-02, 06, and 08 shall not exceed 10,607 tons during all periods of twelve consecutive months. Any combination of VOC emissions from the 3 tracts is

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permissible, with no tract limited separately, provided the combined total VOC emissions from the 3 tracts do not exceed 10,607 tons during all 12 month periods.

TAPCR 1200-03-07-.07(2) and TAPCR 1200-03-09-.02(11)(f)5(ii)

Compliance Method: Compliance shall be assured using the emission factors from the Brown-Forman Barrel Study (traditional) of 7.35 lbs of ethanol loss/barrel/year and the Early Times (heated) Barrel Study of 10.5 lbs of ethanol loss/barrel/year. Refer to Attachment 2. The following monthly logs shall be kept to record the number of barrels stored in the warehouses and calculate VOC emissions. The results from the log records shall be reported in accordance with Condition **E2(a)(1)** of this permit. The appropriate emission factor(s) shall be used to reflect any change in the existing arrangement. As of May 1, 2005, heating is no longer utilized in any warehouse.

LOG 1: MONTHLY LOG FOR COMPLIANCE PURPOSES

Month/Year: _____

Source	Location	Type of Warehouse	Number of Warehouses	Material Processed (Number of Barrels of whiskey per Month)	Emission Factor (lbs VOC/barrel/mo.)	VOC Emissions (tons/month)
64-0013-06	Tract I	Traditional	96		0.6125*	
	and					
64-0013-02	Tract II					
	and					
64-0013-08	Tract III					
Total					Monthly Total from all Warehouses	

* Based on emission factors from the Brown-Forman Barrel Study (traditional) of 7.35 lbs of ethanol loss/barrel/year

LOG 2: LOG OF VOC EMISSIONS FOR 12 CONSECUTIVE MONTHS

	VOC Emissions	
Month/Year	Tons/month	Tons/12 consecutive months*

* The Tons per 12 Month value is the sum of the VOC emissions in the 11 months preceding the month just completed + the VOC emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this log, 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, that is, 6 (2) represents 6 tons emitted in 2 months.

Comments: Highest VOC emissions: 10,074.9 tons per 12 consecutive months ending January 2023.

Type of Review: ☒ Full ☐ Spot

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E6. 64-0013-04 Processing and Bottling

64-0013-05, Tract II 64-0013-07, Tract I	Processing and Bottling	After barrels from warehouses are dumped into collection troughs and rinsed with hot water for recovery, the processing and bottling stage begins for Tract II. Tract I single barrels are dumped at a separate location and processed independently. The processing and bottling VOC emissions occur due to filtering of physical impurities, gauging, and the cutting to final bottling proof. Aged whiskey is shipped to other beverage producers. The remaining whiskey is bottled on site. VOC emissions result from the vapors displaced from the bottle headspace during filling and from incidental spillage. Processing and bottling from Tract I for the single barrel operation was previously designated as source 64-0014-02 and is now designated as 64-0013-07.
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Condition 6-1 applies to Emission Source 64-0013-04

- 6-1.** Volatile organic compounds (VOC) from this source #04 (combined from source 64-0013-05 (Tract II) and source 64-0013-07 (Tract I) shall not exceed 483.7 tons during all periods of twelve (12) consecutive months of operation.

TAPCR 1200-03-07-.07(2) and TAPCR 1200-03-09-.02(11)(f)5(ii)

Compliance Method: Compliance shall be assured by using the VOC emission factor of 0.5% based on historical loss. The logs and the calculation formula below shall be used in determining and logging monthly emissions. This log data shall be reported in accordance with Condition **E2 (a)(1)**. Records of the calibrations for the density meters, hydrometers, thermometers, and tank scales shall be kept on site and available to the Technical Secretary or his representative upon request.

LOG 3: MONTHLY LOG FOR COMPLIANCE PURPOSES FOR PROCESSING & BOTTLING FROM 64-0013-05 & 07

processing and bottling from all Tracts	Month/Year	Proof Gallons per Month	VOC Emissions released monthly (pounds) *	VOC Emissions (tons/month)	VOC Emissions (tons/12 consecutive months)**
		Total for all Tracts			

* VOC emissions from ethanol are calculated as follows using a 0.5% evaporative loss factor:

Pounds of VOC emitted = Number of proof gallons x 0.005 x 6.6 lbs/gal of ethanol x gal ethanol/2 proof gallons

**The Tons per 12 Month value is the sum of the VOC emissions in the 11 months preceding the month just completed + the VOC emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this log, 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, that is, 6 (2) represents 6 tons emitted in 2 months.

Comments: Highest VOC emissions: 365.7 tons per 12 consecutive months ending January 2023.

Type of Review: ☒ Full ☐ Spot
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E-7. Reserved

Comments: N/A

E-8. Reserved

Comments: N/A

E9 64-0013-12 Fuel Burning Source

64-0013-12 This source consists of the following eleven (11) boilers.					
Number of Units	Boilers I.D.	Heat input in MMBtu/hr	Primary Fuel	Back-up fuel	Status
8 (Eight)	WH 3-23, WH 3-24, WH -25, WH 3-26, WH 3-27, WH 3-28, WH 3-29 and WH 3-30	5.773 each	No. 2 fuel oil	Propane	New source subject to 40 CFR 63 subpart JJJJJ
3 (Three)	WH 3-20, WH 3-21 and WH 3-22	5.773 each	No. 2 fuel oil	Propane	New source subject to 40 CFR 63 subpart JJJJJ

*WH = Warehouses

Conditions E9-1 through E9-12 apply to Emission Source 64-0013-12

- E9-1. Particulate matter emitted from boilers listed below shall not exceed the respective lb/hr limits (total 0.88 lb/hr). The PM allowable tonnage from these sources totals 1.7 tons during all periods of twelve consecutive months and is based on the agreement letters summarized in the table below:

TAPCR 1200-03-06-.01(7).

Source No. of Boilers	Heat Input Rate MMBtu /hr	PM Allowable Limits		Applicable Rule 1200-03-	Comments
			lb/hr		
Three (3) Boilers: WH 3-20 WH 3-21 and WH 3-22	5.773 each	Agreement	@0.08 (0.24 total)	06-.01(7)	Agreement letter/application dated September 10, 2015
Eight (8) Boilers: WH 3-23 through WH 3-30	5.773 each	Agreement	@0.08 (0.64 total)	06-.01(7)	Agreement letter/application dated September 10, 2015

Compliance Method: Compliance shall be assured by using the current EPA AP-42 emission factors for each category of fuel (natural gas, No.2 fuel oil, propane) used on the relevant boilers listed in the Condition E9. A monthly log of fuels used in these boilers shall be maintained on site and shall be made available for inspection by the Technical Secretary or his representative and shall be retained for a period of at least five (5) years.

Comments: Records are maintained as required.

Type of Review: ☒ Full ☐ Spot

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- E9-2. Sulfur dioxide emitted from boilers listed below shall not exceed the respective lb/hr limits (32.34 lbs/hr total) nor 38.5 tons during all periods of twelve consecutive months based on heat input capacity fire rate and a maximum sulfur content of 0.5% by weight, as itemized in the table below:

Source No. of Boilers	Heat Input Rate MMBtu/hr	Allowable Limits		Applicable Rule 1200-03-	Comments
			lb/hr		
Three (3) Boilers (#2 fuel oil): WH 3-20; WH 3-21 and WH 3-22	5.773 each	Agreement	2.94 each (8.82 total)	14-.01(3)	Agreement letter/application dated September 10, 2015
Eight (8) Boilers: WH 3-23; WH 3-24; WH 3-25 through WH 3-29; WH 3-30	5.773 each	Agreement	2.94 each (23.52 total)	14-.01(3)	Agreement letter/application dated September 10, 2015

Compliance Method: Compliance shall be assured by using the EPA AP-42 emission factor at 0.5% sulfur content by weight at maximum fire rate of the boiler for distillate oil. For each shipment of oil utilized in the boiler, documentation shall be supplied which contains information sufficient to establish the sulfur content of the fuel oil. This may include vendor analysis, MSDS, fuel oil specification data, or similar information, which stipulates the sulfur content of the fuel oil. This information shall be submitted and reported for the semiannual period in which the oil is utilized in these boilers. This shall be reported in accordance with Condition E2 (a)(1) and maintained according to Condition Error! Reference source not found..

Comments: Sulfur content data is submitted with semiannual reports. Records are maintained as required.

Type of Review: ☒ Full ☐ Spot

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- E9-3. The following maximum actual emissions for gaseous pollutants from all boilers as indicated in Condition E9 of this permit shall serve as allowable emissions for annual emissions fee purposes. These values are based on current AP-42 emission factors from No. 2 oil and propane in accordance with each boiler usages as indicated in Condition E9 of this permit. Should emission factors change during the period of this permit the values may be adjusted through an administrative amendment to the Title V Permit 572445.

Pollutant	lbs/hour	Tons/year
NO _x	6.08	21.6
VOC	0.17	1.0
CO	2.3	8.9

TAPCR 1200-03-26-.02 (2) (d) 3.

Comments: Emission factors did not change during the inspection review period.

E9-4. NESHAP for Boilers at Area Sources

Pursuant to 40 CFR 63.11193 (or subsequent revisions and or updated promulgation of the said Rule as applicable) the owner or operator of an industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195 is subject to 40 CFR Part 63 Subpart JJJJJ known as Area Source Boilers.

Compliance Method: None. This condition identifies that the permittee is subject to 40 CFR Part 63 Subpart JJJJJ.

Comments: Informational condition only.

E9-5. The affected sources by this subpart

Pursuant to 40 CFR § 63.11194(a) this subpart applies to each new, reconstructed, or existing affected source as defined in paragraphs (a)(1) and (2) of this section.

(1) The affected source is the collection of all existing industrial, commercial, and institutional boilers within a subcategory (coal, biomass, oil), as listed in §63.11200 and defined in §63.11237, located at an area source.

(2) The affected source of this subpart is each new or reconstructed industrial, commercial, or institutional boiler within a subcategory, as listed in §63.11200 and as defined in §63.11237, located at an area source.

(b) An affected source is an existing source if the permittee commenced construction or reconstruction of the affected source on or before June 4, 2010.

(c) An affected source is a new source if the permittee commenced construction or reconstruction of the affected source after June 4, 2010 and the permittee meets the applicability criteria at the time the permittee commences construction.

(d) An affected source is a reconstructed source if the boiler meets the reconstruction criteria as defined in §63.2, you commenced reconstruction after June 4, 2010, and the boiler meets the applicability criteria at the time you commence reconstruction.

(e) An existing dual-fuel fired boiler meeting the definition of gas-fired boiler, as defined in §63.11237, that meets the applicability requirements of this subpart after June 4, 2010 due to a fuel switch from gaseous fuel to solid fossil fuel, biomass, or liquid fuel is considered to be an existing source under this subpart as long as the boiler was designed to accommodate the alternate fuel.

As defined above the following fuel burning units at Jack Daniel Distillery, Lem Motlow Proprietor (JDD Prop) facility I.D number 64-0013 are subject to 40 CFR Part 63 Subpart JJJJJ:

Fuel burning units I.D.	Heat Capacity (mmBtu/hr)	Primary fuel	Status
WH 3-20, WH 3-21, WH 3-22, WH 3-23, WH 3-24, WH 3-25, WH 3-26, WH 3-27, WH 3-28, WH 3-29, WH 3-30	5.773 each	#2 fuel Oil	New Source

Compliance Method: None. This condition identifies which fuel burning units are subject to 40 CFR Part 63 Subpart JJJJJ.

Comments: Informational condition only.

E9-6. Pursuant to 40 CFR 63.11196 compliance dates

(a) The owner or operator of an existing affected boiler must achieve compliance with the applicable provisions in this subpart as specified in paragraphs (a)(1) of this section.

(1) The **existing** affected boiler is subject to a work practice or management practice standard of a tune-up, the permittee must achieve compliance with the work practice or management standard no later than May 21, 2014.

(b) If the permittee starts up a **new** affected source on or before May 20, 2011, the permittee must achieve compliance with the provisions of this subpart no later than May 20, 2011.

(c) If the permittee starts up a new affected source after May 20, 2011, the permittee must achieve compliance with the provisions of this subpart upon startup of the affected source.

Compliance Method: Compliance shall be assured by achieving the requirement by specified dates for each affected source.

Comments: Informational condition only.

E9-7. Pursuant to 40 CFR 63.11225(a)(2) and 40 CFR 63.11225(b) submit an Initial Notification

As specified in Subpart A-General Provisions §63.9(b)(2), the permittee must submit the Initial Notification no later than January, 2014 or within 120 days after the source becomes subject to the standard. The Notification shall provide the following information:

1. The name and address of the owner or operator;
2. The address (i.e., physical location) of the affected source;
3. An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date;
4. A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and a statement of whether the affected source is a major source or an area source.

Compliance Method: Compliance shall be assured by submitting the Initial Notification on the specified dates to the **Technical Secretary, Division of Air Pollution Control** to the address as indicated in Condition **E2(c)** of this permit.

Comments: This facility submits initial notification in accordance with 40 CFR 63.11225. (See complete table of dates in the table following condition E9-10.)

E9-8. Pursuant to 40 CFR 63.11225(a)(4) submit an Initial Notification of Compliance Status

The permittee must submit the **Notification of Compliance Status** in accordance with §63.9(h) no later than 120 days after the applicable compliance date specified in Condition E9-6 [§63.11196]. The notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

(i) "This facility complies with the requirements in Condition E9-9 [§63.11214] to conduct an initial tune-up of the boiler."

(ii) "This facility has had an energy assessment performed according to §63.11214(c)."

(iii) You must submit the Notification of Compliance Status no later than 120 days after the applicable compliance date specified in §63.11196 unless you own or operate a new boiler subject only to a requirement to conduct a biennial or 5-year tune-up or you must conduct a performance stack test. If you own or operate a new boiler subject to a requirement to conduct a tune-up, you are not required to prepare and submit a Notification of Compliance Status for the tune-up. If you must conduct a performance stack test, you must submit the Notification of Compliance Status within 60 days of completing the performance stack test. You must submit the Notification of Compliance Status in accordance with paragraphs (a)(4)(i) and (vi) of this section. The Notification of Compliance Status must include the information and certification(s) of compliance in paragraphs (a)(4)(i) through (v) of this section, as applicable, and signed by a responsible official. §63.11225(a)(4)

(iv) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."

Comments: This facility submits initial compliance status in accordance with 40 CFR 63.11225. (See complete table of dates in the table following condition E9-10.)

E9-9. Pursuant to 40 CFR 63.11214(b), demonstrate initial compliance with the work practice standard, and management practice. If you own or operate an existing or new biomass-fired boiler or an existing or new oil-fired boiler, you must conduct a performance tune-up according to §63.11210(c) or (g), as applicable, and §63.11223(b). If you own or operate an existing biomass-fired boiler or existing oil-fired boiler, you must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted an initial tune-up of the boiler.

Compliance Method: Compliance shall be assured by submitting a signed statement in the Notification of Compliance Status report.

Comments: This facility submits the notification of compliance status report in accordance with 40 CFR 63.11214(b). (See complete table of dates in the table following condition E9-10.)

E9-10. Pursuant to 40 CFR 63.11201, §63.11223(a) and §63.11223(b) to demonstrate continuous compliance with the work practice and management practice standards

The permittee must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in paragraphs §63.11223(b)(1) through (7) of this section.

- (1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (permittee may delay the burner inspection until the next scheduled unit shutdown, but the permittee must inspect each burner at least once every 36 months).
- (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
- (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).
- (4) Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available.
- (5) Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made. Measurements may be taken using a portable CO analyzer).
- (6) Maintain onsite and submit, if requested by the Administrator, a report containing the information in paragraphs (b)(6)(i) through (iii) of this section.
 - (i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured before and after the tune-up of the boiler.
 - (ii) A description of any corrective actions taken as a part of the tune-up of the boiler.
 - (iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
- (7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days one week of startup.

Compliance Method: Compliance shall be assured by achieving the requirements in this condition as described above and submitting (upon request) the certified and signed, biennial compliance report required by Condition E9-11.

Comments: This facility submits the notification of compliance status report in accordance with 40 CFR 63.11201, 63.11223(a), and 63.11223(b). The table below reflects compliance with conditions E9-7(SM1) – E9-10(SM1) for those boilers which have been constructed. Boilers 3-26, 3-27, 3-28, 3-29 and 3-30 will not be installed for warehouse heating of sprinkler fire protection systems. Instead of boilers, the facility is transitioning to heat pumps to serve this purpose for fire protection systems. The warehouses, however, are still being constructed.

Fuel burning units I.D.	Heat Capacity (mmBtu/hr)	Primary fuel	
WH 3-20, WH 3-21, WH 3-22	5.773 each	#2 fuel Oil	Initial Compliance <u>02-17-2015</u> Compliance Status <u>05-12-2015</u> Initial Tune Up <u>01-12 and 14-2015</u> Biennial Tune Up <u>12-28-2022</u>
WH 3-23, WH 3-24, WH 3-25	5.773 each	#2 fuel Oil	Initial Compliance <u>12-16-2019 (23/24)</u> & <u>01-14-2020(25)</u> Compliance Status <u>01-14-2020</u> Initial Tune Up <u>11-20-2019 (23/24) &</u> <u>01-10-2020 (25)</u> Biennial Tune Up <u>12-06-2021 (23/24)</u> <u>01-10-2022 (25)</u>
WH 3-26, WH 3-27, WH 3-28 <i>(Not yet constructed)</i>	5.773 each	#2 fuel Oil	Initial Compliance _____ Compliance Status _____ Initial Tune Up _____ Biennial Tune Up _____
WH 3-29, WH 3-30 <i>(Not yet constructed)</i>	5.773 each	#2 fuel Oil	Initial Compliance _____ Compliance Status _____ Initial Tune Up _____ Biennial Tune Up _____

E9-11. Pursuant to 40 CFR 63.11225(b) notification, reporting, and recordkeeping requirements

For boilers that are subject only to a requirement to conduct a biennial tune-up according to §63.11223(a) and not subject to emission limits or operating limits, the permittee may prepare only a biennial compliance report as specified in paragraphs (b)(1) through (4) of this section, and submit to the delegated authority. For existing sources, the first biennial compliance certification report must be submitted by March 1, 2015, Subsequent report submitted by March 1 of every other year. For new sources, the first biennial compliance certification report must be submitted by March 1, 2012 or on March 1 of the year immediately following start-up of the new or reconstructed boiler, whichever is later. Subsequent report submitted by March 1 of every other year.

(1) Company name and address.

(2) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. Your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

(i) "This facility complies with the requirements in §63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler."

(ii) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."

(iii) "This facility complies with the requirement in §§63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available.

(3) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.

(4) The total fuel use by each affected boiler subject to an emission limit, for each calendar month within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by you or EPA through a petition process to be a non-waste under §241.3(c), whether the fuel(s) were processed from discarded non-hazardous secondary materials within the meaning of §241.3, and the total fuel usage amount with units of measure.

Comments: This facility submits reports upon request and as otherwise required in accordance with 40 CFR 63.11225. No reports were requested during this inspection period.

E9-12. Pursuant to 40 CFR 63.1125(c)(2)(i) records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.

Pursuant to 40 CFR 63.11225(c)(2)(ii): For operating units that combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to §241.3(b)(1) of this chapter, you must keep a record which documents how the secondary material meets each of the legitimacy criteria under §241.3(d)(1). If you combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to §241.3(b)(4) of this chapter, you must keep records as to how the operations that produced the fuel satisfies the definition of processing in §241.2 and each of the legitimacy criteria in §241.3(d)(1) of this chapter. If the fuel received a non-waste determination pursuant to the petition process submitted under §241.3(c) of this chapter, you must keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust non-hazardous secondary materials as fuel per §241.4, you must keep records documenting that the material is a listed non-waste under §241.4(a).

Compliance Method: Compliance shall be assured by achieving the requirements in this condition.

Comments: Records are retained as required. Specifications for boiler WH 3-20 through 22 were reviewed. No hazardous materials were combusted in any boiler during this inspection period.

Type of Review: ☐ Full ☒ Spot

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End of Permit Number: 572445

Additional General Information:

1) A copy of the Department's *Mercury-Added Product Disposal Requirements* was given to the facility for review: ☒ YES ☐ NO

2) Was any complaint received? ☒ YES ☐ NO

If YES, provide comments: As of the date of this inspection, 32 complaints have been received for warehouse construction and design and microflora baudoinia compniacensis. Complaints regarding warehouse construction and design were referred to APC permitting section for evaluation and complaints regarding microflora baudoinia compniacensis were found to be out of the jurisdiction of APC as the Division does not regulate indoor nor outdoor fungus/mold. In addition to the regular procedure followed during APC inspection, the inspector also toured a random sampling of warehouses. No violation with any permit condition was found.

3) Has open burning occurred at this facility? ☐ YES ☒ NO

If YES, provide comments: N/A

4) Was there any air-related construction/modification? ☒ YES ☐ NO

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If YES, provide comments: Warehouses 3-26, 3-27, 3-28, and 3-30 were constructed. Warehouse 3-28 is not yet complete and warehouse 3-29 is still in the land clearing and preparation period.

5) Is any air-related construction/modification planned? ☒ YES ☐ NO

If YES, provide comments: Completion of warehouse 3-29 is anticipated in the near future. Six additional warehouses may be constructed over the next four years.

6) Are there any unpermitted and/or exempt sources (e.g., stationary engines, boilers) that need further attention? ☐ YES ☒ NO

If YES, provide comments: N/A

7) Is the facility current on fees at the time of the inspection?

☒ YES ☐ NO

If NO, provide comments: N/A



March 17, 2023

Name/Date

VEE Certification Number: 2612

Certification Expiration Date: September 2023

I verify that the format and content of this report conforms to established TN Division of Air Pollution Control annual inspection standard operational procedures guidance.



March 20, 2023

Manager/Date