

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



MODIFICATION #2 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 1200-3-9-.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: **April 29, 2004**

Permit Number:

Date of Minor Modification #2:

MAY 08 2006

556316

Date Expires: **April 1, 2009**

Issued To:

Johnson Controls, Inc

Installation Address:

**1890 Mines Road
Pulaski**

Installation Description:

01 - Polyurethane Foam Manufacturing (3 Lines)

Modification #2: Increase VOC allowable emission limit

Emission Source Reference No.: **28-0076**

Renewal Application Due Date: **Between June 1, 2008 and October 1, 2008**

Primary SIC: **25**

Responsible Official:

Name: **Kathy Arnold**

Title: **Plant Manager**

Facility Contact Person:

Name: **Randy Austin**

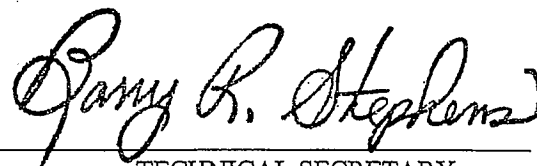
Title: **Environmental Coordinator**

Phone: **(931) 424-7872**

Information Relied Upon:

Letter Dated: **January 23, 2006**

(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 OR FILE AT INSTALLATION ADDRESS

SECTION E

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

28-0076 Facility Description: Polyurethane Foam ManufacturingE1(M2). Fee payment: Allowable emissions basis.

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 28-0076

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	31.8	N/A	Includes all fee emissions.
PM ₁₀	N/A	N/A	
SO ₂	N/A	N/A	
VOC	Now - 258.0 (Was 248.0)	N/A	Includes all fee emissions.
NO _x	N/A	N/A	
CATEGORY OF MISCELLANEOUS HAZARDOUS AIR POLLUTANTS (HAP WITHOUT A STANDARD)			
VOC FAMILY GROUP	N/A	AEAR	These values <u>are</u> included in VOC above.
PM FAMILY GROUP			
CATEGORY OF SPECIFIC HAZARDOUS AIR POLLUTANTS (HAP WITH A STANDARD)			
VOC FAMILY GROUP	N/A	N/A	
NON-VOC GASEOUS GROUP	N/A	N/A	
PM FAMILY GROUP	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 begins each July 1st and ends June 30th of the following year. The present Annual Accounting Period began July 1, 2005 and ends June 30, 2006. The next Annual Accounting Period begins July 1, 2006 and ends June 30, 2007.

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 1200-3-26-.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.

* **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 1200-3-26-.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 1200-3-11 or Chapter 1200-3-31. 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 1200-3-26-.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 1200-3-26-.02(2)(i).

END NOTES

The permittee shall:

- (1) Pay annual allowable based emission fees for the present Annual Accounting Period.
- (2) Pay major source annual allowable based emission fees, as requested by the responsible official, in accordance with the above Fee Emissions Summary Table beginning July 1, 2006 of the next annual accounting period.

The Tennessee Air Pollution Control Division will bill the permittee no later than April 1 prior to the end of each annual accounting period. The annual emission fee is due July 1 following the end of each annual accounting period. If any part of any fee imposed under TAPCR 1200-3-26-.02 is not paid within fifteen (15) days of the due date, penalties shall at once accrue as specified in TAPCR 1200-3-26-.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 shall be submitted to The Technical Secretary at the address in Condition E2(M2)(b) of this permit.

TAPCR 1200-3-26-.02 (3) and (9), and 1200-3-9-.02(11)(e)1 (iii) and (vii)

E2(M2). Reporting requirements.

(a) **Semiannual reports.** The first report since issuance of this Minor Modification #2 shall cover the 6-month period from ~~April 1, 2006 to September 30, 2006~~ and shall be submitted within 60 days after the 6-month period ending **September 30, 2006**. Subsequent reports shall be submitted within 60 days after the end of each 6-month period following the first report.

Semiannual reports of this facility (28-0076) shall include:

- (1) Any monitoring and recordkeeping required by Conditions ~~E4-2(M2)~~ of this permit.
- (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 address in Condition E2(M2)(b) of this permit.

TAPCR 1200-3-9-.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;
- (3) Whether such method(s) or other means provide continuous or intermittent data. 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;

- (4) The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in E2(M2)(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
- (5) 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 that is detected by monitoring that provides data in terms of an emission limitation or standard and that 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 shall cover the 12-month period from ~~October 1, 2005 to September 30, 2006~~ and shall be submitted within 60 days after the 12-month period ending September 30, 2006. 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:

The Technical Secretary
Division of Air Pollution Control
ATTN: West Tennessee Permit Program
9th Floor, L & C Annex
401 Church Street
Nashville, Tennessee 37243-1531

and

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

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol.62, No.204, October 22, 1997, pages 54946 and 54947

E4. Source Specific Emission Standards.

Polyurethane Foam Production

28-0076-01

Source consists of foam production lines where various mixtures of Polyol, Toluene Diisocyanate (TDI), and Diethanolamine (DEOA), are injected into molds to produce polyurethane foam for automotive seat cushions. Minor repairs are performed using Methylene Diphenyl Diisocyanate (MDI) as the foaming agent.
MINOR MODIFICATION #2: Increase in VOC allowable emission limit

M2-1 It has been determined that the increase in the permitted allowable VOC emission rate qualifies as a minor permit modification as stated under 1200-3-9-.02(11) (f) 5 (ii) of the Tennessee Air Pollution Control Regulations. This is a minor permit modification to the Title V Permit #556316. This is not a modification under Title I of the Federal Act.

E4-2(M2) Volatile organic compounds (VOC) emitted from this source shall not exceed 258.0 tons during all intervals of twelve (12) consecutive months.

Compliance Method: The permittee shall calculate the actual quantities of VOC and HAPs emitted from this facility during each calendar month and during each twelve consecutive (12) month period. The permittee shall maintain records of these emissions in a form that readily shows compliance with this condition. (See Logs 1 and 2 for an example) These logs must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. These logs must also be reported in accordance with condition E2(M2) of this permit and be retained for a period of not less than five (5) years.

- Toluene Diisocyanate (TDI) emissions shall be calculated using the emission factor of 3.29×10^{-5} lb TDI emitted per lb of TDI used. This emission factor is based on a source test performed on October 1, 1997.
- Diethanolamine (DEOA) emissions shall be calculated using the emission factor of 7.94×10^{-6} lb DEOA emitted per lb of DEOA used. This emission factor is based on calculations described in a letter dated September 15, 2004, signed by Orlando Castano, Plant Manager of the facility.
- Methylene Diphenyl Diisocyanate (MDI) emissions shall be calculated using the emission factor of 9.39×10^{-6} lb MDI emitted per lb of MDI used. This emission factor is based on a source test performed on October 1, 1997.

M2-2 Conditions E1(M2), E2(M2), and E4-2(M2) of this Minor Modification #2 replace condition E1 of Title V permit #556316, and conditions E2(M1) and E4-2(M1) of Minor Modification #1 to Title V permit #556316, respectively. With the exception of conditions E1, E2(M1) and E4-2(M1), the permittee shall comply with all requirements of the Title V permit #556316.

End of Minor Modification #2

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

RECEIVED
BCH
TAH
MAY 10 2006
DNH
JK



ENVIRONMENTAL ASSISTANCE
CENTER - COLUMBIA

NOTICE OF PERMIT UPDATE

COMPANY FILE

NUMERIC FILE

EAC - *Columbia*

FROM John Fuss

DATE May 5, 2006

STAPLE THE ATTACHED LETTER (TITLE V OR NON-TITLE V OPERATIONAL FLEXIBILITY LETTER) OR MINOR MODIFICATION (AS INDICATED) TO THE END OF PERMIT # 556316, COMPANY # 28-0076, SOURCE # 01.

CHECK THE APPROPRIATE BOX BELOW:

LETTER DATED January 23, 2006

FROM Kathy Arnold

MINOR MODIFICATION # 2

CHECK THE APPROPRIATE BOX BELOW:

CONCERNING

OPERATIONAL FLEXIBILITY NON TITLE V

OPERATIONAL FLEXIBILITY TITLE V

☒ MINOR MODIFICATION TITLE V

THE LETTER OR MINOR MODIFICATION MUST BE STAPLED
TO THE BACK OF THE PERMIT