

Hattie B. Benet

From: Hattie B. Benet
Sent: Friday, March 31, 2023 7:47 AM
To: elizabeth.graff1000@gmail.com
Cc: Bill McCabe; John Fuss
Subject: RE: [EXTERNAL] Whiskey Aging Warehouses in Lincoln County

Importance: High

RE: Complaint Concerning Facility 64-0013; Complaint 126420

Dear Ms. Graff:

Concerning complaint 126420 received on March 30, 2023, alleging Inadequate Permitting of Distillery Warehouse / Black Fungus in Lincoln County.

The residents are concerned about the emissions from these barrelhouses and the resulting fungus problems. We believe these aging warehouses are not eligible for the fugitive emissions exemption and therefore Jack Daniels is in violation of their Title V permit. We are requesting that your agency send a representative to 844 Lynchburg Highway, Mulberry to inspect these barrelhouses for fugitive emissions status.

The State of Tennessee Division of Air Pollution Control does not regulate indoor or outdoor fungus or mold including the microflora *baudouinia compniacensis*, an organism commonly found in the environment surrounding a distillery's maturation warehouses. Additionally, the Division does not regulate odors. However, if an odor complaint is associated with a process or air emissions source, the Division will conduct a site investigation to ensure the odor is not a result of deviation from a permit condition.

Major source operating Permit 572445 was issued on June 7, 2018 for facility 64-0013 for beverage alcohol manufacturing. New whisky maturation warehouses are being constructed under the authority provided in that operating permit. The facility currently has submitted a minor modification application to the current permit to add an additional 23 whisky maturation warehouses. That minor modification is currently under review. Please note that changes contained in a minor modification application are allowed to occur upon submission of a minor modification application. Also, the facility has a pending major source operating renewal application. The facility is required to operate in accordance with the provisions of the existing permit until a renewal is issued.

The mention of filtration and thus design of the barrel houses associated with this complaint has been referred to our permitting section who are working with the facility to obtain additional information needed. This request was sent certified mail to the facility on December 8, 2022, with a deadline for information submission within 60 days of letter receipt. Additional information was received on February 13, 2023, submitted as confidential business information. The Division has reviewed the design of the newer barrel houses associated with this complaint, and at this time does not identify any non-compliance with applicable state and federal air quality regulations and their major source permit. If you need additional details regarding this matter, Mr. John Fuss is the team member in permitting working on this case and will be the best point of contact. He can be reached at 615-532-0535 or John.Fuss@tn.gov.

The Division of Air Pollution Control conducts routine inspections of all major sources biennially. Additional inspections may be completed between routine inspections if; complaints are received, deviations from permit

conditions occur, or other reason for concern. The facility inspection consists of a records review and facility tour, observing all emissions points and processes. This ensures compliance or identifies deviation for all permit conditions. Major source facilities are also required to submit annual and semi-annual compliance reports which require identification of compliance or deviation from all permit conditions. The most recent inspection of facility 64-0013 was on March 16, 2023. The facility was found to be in compliance with all conditions of permit 572445.

We appreciate your concern for the air quality in Tennessee. If further clarification or assistance is needed, feel free to contact me at 931-840-4159 or by email at Hattie.B.Benet@tn.gov.

Sincerely,

Hattie Benet



Hattie Benet | Inspector
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From: Elizabeth Graff <elizabeth.graff1000@gmail.com>
Sent: Wednesday, March 29, 2023 5:40 PM
To: Columbia EFO_ADM <Columbia.EFO_ADM@tn.gov>
Subject: [EXTERNAL] Whiskey Aging Warehouses in Lincoln County

To Columbia Field Office:

You are probably aware of the controversy around Jack Daniels building barrel houses in Lincoln County. The residents are concerned about the emissions from these barrelhouses and the resulting fungus problems. We believe these aging warehouses are not eligible for the fugitive emissions exemption and therefore Jack Daniels is in violation of their Title V permit. We are requesting that your agency send a representative to 844 Lynchburg Highway, Mulberry to inspect these barrelhouses for fugitive emissions status.

Thank you

Elizabeth Graff
Lincoln County Barrelhouse Citizen's Action Committee