



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
William R. Snodgrass Tennessee Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

March 21, 2022

Mr. Mark Ryneerson, Safety Manager
Talos Engineered Products LLC
841 Industrial Drive
Lewisburg, TN 37091

Certified Article Number

9414 7266 9904 2170 1015 82

SENDER'S RECORD

Re: Constructing and Operating Without a Permit
Talos Engineered Products LLC
841 Industrial Drive, Lewisburg
Facility ID: 59-0174

Dear Mr. Ryneerson:

On May 24, 2013, the Technical Secretary issued permit 067218P (Facility ID: 59-0090) for a surface coating operation located at 899 Industrial Drive, Lewisburg. On January 25, 2022, the Division received an operating permit renewal application and insignificant activity request for the existing surface coating operation. The renewal application indicated a site address of 841 Industrial Drive, Lewisburg.

On February 22, 2022, the Division received additional information confirming that operations were relocated from 899 Industrial Drive, Lewisburg, to 841 Industrial Drive, Lewisburg, in 2014.

Tennessee Air Pollution Control Regulations (TAPCR) rule 1200-03-09-.03(6)(b), states, in pertinent part:

No operating permit, construction permit, notice of coverage, or notice of authorization is transferable from one air contaminant source to another air contaminant source or from one location to another location.

Since you did not obtain a construction permit for the surface coating operation prior to relocating and subsequently operating the source at 841 Industrial Drive, you are in violation of the following Tennessee Air Pollution Control Regulations:

Rule 1200-03-09-.01(1)(a) of the TAPCR states, in pertinent part:

Except as specifically exempted in Rule 1200-03-09-.04, no person shall begin the construction of a new air contaminant source or the modification of an air contaminant source which may result in the discharge of air contaminants without first having applied for and received from the Technical Secretary a construction permit ... for the construction or modification of such air contaminant source.

Rule 1200-03-09-.02(2) of the TAPCR states, in pertinent part:

No person shall operate an air contaminant source in Tennessee without first obtaining from the Technical Secretary an operating permit or, if applicable, submitting a notice of intent and obtaining a notice of coverage or authorization, except as specifically exempted in Rule 1200-03-09-.04.

Compliance with the Tennessee Air Quality Act, the Tennessee Code Annotated, and the Tennessee Air Pollution Control Regulations contribute to the protection of the health, welfare, and physical property of the people and are used to help maintain an equitable balance between the benefits of clean air and the economic cost of achieving clean air in our state.

If you have any information that proves the violations did not occur (i.e. constructing and operating without a permit), or if you have any additional information regarding this violation that you would like to submit, you may submit that information in writing to the Technical Secretary, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, 15TH Floor, Nashville, Tennessee 37243 or e-mail the response letter to Air.Pollution.Control@TN.gov. To ensure that your information will be considered, it must be submitted within 20 days of your receipt of this **Notice of Violation**.

Technical inquiries surrounding this allegation of noncompliance should be directed to Joshua Rhoads at (615) 532-0547 or at Joshua.Rhoads@tn.gov. Questions concerning the enforcement process should be directed to Air.Pollution.Control@TN.gov.

Sincerely,



James P. Johnston, P.E.
Deputy Director
Permitting and Regulatory Development