



OPERATING PERMIT Issued Pursuant to Tennessee Air Quality Act

Date Issued: August 17, 2012

Permit Number:
065409P

Date Expires: August 16, 2022

Issued To:
Brad Russom Motor Company

Installation Address:
432 North Trenton Street
Rutherford

Installation Description:
Motor Vehicle or Mobile Equipment Surface Coating
Operations

Emission Source Reference No.
27-0227
NESHAP-Federal Subpart HHHHHH

The holder of this permit shall comply with the conditions contained in this permit as well as all applicable provisions of the Tennessee Air Pollution Control Regulations.

CONDITIONS:

1. The application that was utilized in the preparation of this permit was received on March 15, 2011 and is signed by Brad Russom, Owner for the permitted facility. If this person terminates his/her employment or is assigned different duties such that he/she is no longer the responsible person to represent and bind the facility in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification shall be in writing and submitted within thirty (30) days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the facility in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit 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 covenants. This permit does not cover any air contaminant source that does not conform to the conditions of this permit and the information given in the approved application.

(conditions continued on next page)

A handwritten signature in blue ink that reads "Gary R. Stephens".

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.

NON-TRANSFERABLE

POST AT INSTALLATION ADDRESS

2. The permittee is subject to the requirements of 40 CFR 63 Subpart HHHHHH (6H) National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources because the facility 1) applies coatings containing chromium, cadmium, nickel, lead, or manganese (target HAPs); OR 2) performs paint stripping that contains Methylene Chloride; OR 3) performs spray application to motor vehicles and mobile equipment.
3. Visible emissions from this source 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 from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average) pursuant to TAPCR 1200-03-05-.01(1) and 1200-03-05-.03(6).
4. Routine maintenance, as required to maintain compliance with the requirements of 40 CFR 63 Subpart HHHHHH (6H), shall be performed on the air pollution control device(s). Maintenance records shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than five (5) years.
5. Fugitive emissions from this source shall be controlled as specified in Rule 1200-3-8-.01. Specifically, no person shall cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five (5) minutes per hour or twenty (20) minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in Chapter 1200-3-20. Fugitive emissions from this source shall be determined by Tennessee Visible Emissions Evaluation Method 4 as adopted by the Tennessee Air Pollution Control Board on April 16, 1986.
6. The permittee shall apply for renewal of this permit not less than sixty (60) days prior to the permit expiration date, pursuant to Division Rule 1200-3-9-.02(3).
7. Reports and correspondence shall be mailed to the Division of Air Pollution Control at this address:

Department of Environment and Conservation
Division of Air Pollution Control
9th Floor, L & C Annex
401 Church Street
Nashville, TN 37243-1531
8. The permittee must comply with recordkeeping and reporting requirements, as found in the following table:

Compliance Methods for Recordkeeping and Reporting

Operation	Compliance Method
Recordkeeping	<p>Keep copies of Notifications and Reports, submitted to the Tennessee Division of Air Pollution Control or U.S. EPA, for at least five (5) years with the first two years onsite. These records shall include:</p> <ul style="list-style-type: none"> • Painter training certifications with training dates • Spray booth filter efficiency documentation • Spray gun transfer efficiency • Material Safety Data Sheets (MSDS) of all coatings, thinners, solvents, and other materials used at this source • Annual usage of Methylene Chloride, if applicable • Written copy of Methylene Chloride (MeCl) Minimization Plan if more than one ton per year of MeCl used, as applicable • Deviation and corrective action documentation • Routine maintenance of air pollution control device(s).
Reporting	<p>The Annual Notification of Changes report is required by March 1st of each calendar year and shall include:</p> <ul style="list-style-type: none"> • Statement certifying truth, accuracy, and completeness with name, title, address, telephone, and email (if available) and signature of the owner or operator, or other certifying company official; and a statement of whether the source has complied with all of the conditions of this permit, or an explanation of any noncompliance and corrective actions taken. • Reportable changes occurring to previously submitted notification forms, including Initial Notification, Notification of Compliance Status, and previous Annual Notification of Changes reports. • Deviations from recordkeeping requirements. • Site address of source included in this permit

9. This permittee must use the following methods in Tables A and C to comply with this permit.

TABLE A: Compliance Methods for Spray Application of Coatings containing 6H Target HAPs

Work Area	Compliance Method
I. Spray booth/station/enclosure	<ol style="list-style-type: none"> 1. Exhaust filters to achieve at least 98% capture efficiency. 2. Must have full roof. 3. Must have at least three (3) complete walls or side curtains. 4. Ventilated so that air is drawn into the booth 5. When refinishing motor vehicles or mobile equipment, the work area must be fully enclosed and ventilated at the proper pressure. 6. Mobile ventilated enclosures for spot repairs must be fully enclosed with overspray retained and directed to a filter for capture.
II. Spray Gun(s)	<ol style="list-style-type: none"> 1. Must be high-volume, low-pressure (HVLP), or 2. Electrostatic application, or 3. Airless or air-assisted spray gun, or 4. An equivalent technology
III. Spray Gun Cleaning	Must be done so that an atomized mist or spray of the cleaning solvent is not created outside a container that collects used gun cleaning solvent.

TABLE B: Compliance Methods for Paint Stripping Operations does not apply; no Methylene Chloride in use.

TABLE C: Compliance Methods for Motor Vehicle/Mobile Equipment and Miscellaneous Surface Coating

Operation	Compliance Method
I. Mobile Vehicle/Mobile Equipment and Miscellaneous Surface Coating	<ol style="list-style-type: none"> 1. This source must train and certify all painters on: <ul style="list-style-type: none"> • Spray gun equipment selection • Spray techniques • Maintenance • Environmental compliance with the requirements of 40 CFR 63 Subpart HHHHHH. 2. Employee training and certification is required no later than 180 days after date of hire. 3. Owners and operators who can show by documentation, or certification, that a painter's work experience and/or training is equivalent to the training requirements are not required to provide the initial training as noted above. 4. Painters must complete a refresher course and recertify every five years.

(End of Conditions)