



**STATE OF TENNESSEE
AIR POLLUTION CONTROL BOARD
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE**

PERMIT TO OPERATE AIR CONTAMINANT SOURCE(S)

Permit Number: 078648
Facility (Permittee): Hormann LLC
Facility ID: 93-0118
Facility Address: 450 Airport Road, Sparta
White County
Facility Classification: True Minor
Federal Requirements: None
Facility Description: Garage Door Manufacturing

Operating Permit 078648, consisting of 16 pages is hereby issued September 20, 2021, pursuant to the Tennessee Air Quality Act and by the Technical Secretary, Tennessee Air Pollution Control Board, Department of Environment and Conservation. This permit supersedes all previously issued permits for this/these source(s). This permit expires on December 1, 2031. 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 (TAPCR).

Michelle W. Owenby
Technical Secretary
Tennessee Air Pollution Control Board

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.

Section I – Sources Included in this Operating Permit

FACILITY DESCRIPTION			
Source Number	Source Description	Status	Control Device/Equipment
01	Forming Door Hardware	Insignificant	
02	EPS Foam Panel Imprinting and Gluing Operation	Active	Dust Collector
04	Custom Paint Application	Insignificant	
05	Pentane Tank Recirculation Loop Component Fugitives	Insignificant	

Section II – Permit Record

Permit Type	Description of Permit Action	Issue Date
Initial	Initial Operating Permit	September 20, 2021

Section III - General Permit Conditions

G1. Responsible Person

The application that was utilized in the preparation of this operating permit is dated November 3, 2020 and is signed by Camron Rudd, President, the Responsible Person for the permittee. The Responsible Person may be the owner, president, vice-president, general partner, plant manager, environmental/health/safety coordinator, or other person that is able to represent and bind the facility in environmental permitting affairs. If this Responsible Person terminates their employment or is assigned different duties and is no longer the person to represent and bind the permittee in environmental permitting affairs, the new Responsible Person for the permittee shall notify the Technical Secretary of the change in writing. The Notification shall include the name and title of the new Responsible Person assigned by the permittee to represent and bind the permittee in environmental permitting affairs, and the date the new Responsible Person was assigned these duties.

Should a change in the Responsible Person occur, the new Responsible Person must submit the Notification provided in Appendix 1 of this permit no later than 30 days after being assigned as the Responsible Person. A separate notification shall be submitted for each subsequent change in Responsible Person.

TAPCR 1200-03-09-.03(8)

G2. Application and Agreement Letters

This source shall operate in accordance with the terms of this permit, the information submitted in the approved permit application referenced in **Condition G1**, and any documented agreements made with the Technical Secretary.

TAPCR 1200-03-09-.01(1)(d)

G3. Submittals

Unless otherwise specified within this permit, the permittee shall submit all applicable plans, checklists, certifications, notifications, test protocols, reports, applications, and fees to the attention of the following Division Programs at the addresses indicated in the table below:

Permitting Program	Compliance Validation Program	Field Services Program
<ul style="list-style-type: none"> • Notifications • Startup certifications • Applications • NSPS reports • MACT/GACT/NESHAP reports • Fees • Emission Statements 	<ul style="list-style-type: none"> • Test protocols • Emission test reports • Visible emission evaluation reports 	<ul style="list-style-type: none"> • Semiannual reports • Annual compliance certifications
Division of Air Pollution Control William R. Snodgrass TN Tower, 15 th Floor 312 Rosa L. Parks Avenue Nashville, TN 37243 Air.Pollution.Control@tn.gov		Cookeville Environmental Field Office Tennessee Division of Air Pollution Control 1221 South Willow Avenue Cookeville, TN 38506 APC.CookEFO@TN.gov

The permittee shall submit the information identified above as requested in this permit. In lieu of submitting this information to the mailing addresses above, the permittee may submit the information to the attention of the respective Division Programs via e-mail in Adobe Portable Document format (PDF) to the specified email address.

TAPCR 1200-03-09-.03(8)

G4. Notification of changes

The permittee shall notify the Technical Secretary for any of the following changes to a permitted air contaminant source which would not be a modification requiring a new construction permit:

- change in air pollution control equipment that does not result in an increase or otherwise meet the definition of a modification
- change in stack height or diameter
- change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

The permittee must submit the Notification provided in Appendix 2 of this permit 30 days before the change is commenced.

TAPCR 1200-03-09-.02(7)

G5. Permit Transference

- This permit is not transferable from one air contaminant source to another air contaminant source or from one location to another location. The permittee must submit a construction permit application for a new source to the Permitting Program not less than 90 days prior to the estimated starting date of these events. If the new source will be subject to major New Source Review, the application must be submitted not less than 120 days in advance of the estimated starting date of these events.

TAPCR 1200-03-09-.03(6)(b) and 1200-03-09-.01(1)(b)

- B. In the event an ownership change occurs at this facility, the new owner must submit the notification provided in Appendix 3 of this permit. The written notification must be submitted by the new owner to the Permitting Program no later than 30 days after the ownership change occurs. If the change in ownership results in a change in Responsible Person for the facility, notification of the change in Responsible Person must also be submitted, as specified in **Condition G1**.

TAPCR 1200-03-09-.03(6)(a) and (b)

G6. Operating Permit Application Submittal

- A. The permittee shall apply for an operating permit renewal not less than 60 days prior to the permit's expiration date.

TAPCR 1200-03-09-.02(3)(a)

- B. Operation of each air contaminant source shall be in accordance with the provisions and stipulations set forth in this permit, all provisions of the Tennessee Division of Air Pollution Control Regulations, and all provisions of the Tennessee Air Quality Act.

TAPCR 1200-03-09-.02(6)

G7. Fees

The air contaminant source(s) identified in this permit shall comply with the requirements for payment of applicable annual emission fees to the Tennessee Division of Air Pollution Control based on the Administrative Fees Schedule I provided in Appendix 4 of this permit. The fee must be paid to the Division in full by the first day of the month that the fee is due (determined from Appendix 4). (Note: not all facilities are required to pay annual emission fees)

TAPCR 1200-03-26-.02

G8. General Recordkeeping Requirements

- A. All recordkeeping requirements for all data required to be recorded shall follow the following schedules:

For Daily Recordkeeping	For Weekly Recordkeeping	For Monthly Recordkeeping
No later than seven days from the end of the day for which the data is required.	No later than seven days from the end of the week for which the data is required.	No later than 30 days from the end of the month for which the data is required.

- B. The information contained in logs, records, and submittals required by this permit shall be kept at the facility's address, unless otherwise noted, and provided to the Technical Secretary or a Division representative upon request. Computer-generated logs are acceptable. Compliance is assured by retaining the logs, records, and submittals specified in this permit for a period of not less than five years at the facility's address.

TAPCR 1200-03-10-.02(2)(a)

G9. Routine Maintenance Requirements

The permittee shall maintain and repair the emission source, associated air pollution control device(s), and compliance assurance monitoring equipment as required to maintain and assure compliance with the specified emission limits.

TAPCR 1200-03-09-.03(8)

Compliance Method: Records of all repair and maintenance activities required above 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 years. The date each maintenance and repair activity began shall be entered in the log no later than seven days following the start of the repair or maintenance activity, and the completion date shall be entered in the log no later than seven days after activity completion.

G10. Visible and Fugitive Emissions

- A. Unless otherwise specified, visible emissions from this facility shall not exhibit greater than 20% opacity, except for one six-minute period in any one-hour period, and for no more than four six-minute periods in any 24 hour period. A stack is defined as any chimney, flue, conduit, exhaust, vent, or opening of any kind whatsoever, capable of, or used for, the emission of air contaminants.

TAPCR 1200-03-05-.01(1) and 1200-03-05-.03(6)

Compliance Method: When required to demonstrate compliance, visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

- B. The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Reasonable precautions shall include, but are not limited to, the following:
- (a) Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
 - (b) Application of asphalt, water, or suitable chemicals on dirt roads, material stockpiles, and other surfaces which can create airborne dusts;
 - (c) Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five minutes per hour or 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 TAPCR 1200-03-20. A malfunction is defined as, any sudden and unavoidable failure of process equipment or for a process to operate in an abnormal and unusual manner. Failures that are caused by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

TAPCR 1200-03-08-.01(1) and 1200-03-08-.01(2)

Compliance Method: When required to demonstrate compliance, fugitive emissions shall be determined by Tennessee Visible Emissions Evaluation Method 4 as adopted by the Tennessee Air Pollution Control Board on April 16, 1986.

- C. Fugitive emissions from roads and parking areas shall not exhibit greater than 10% opacity.

TAPCR 1200-03-08-.03

Compliance Method: When required to demonstrate compliance, fugitive emissions from roads and parking areas shall be determined by utilizing Tennessee Visible Emissions Evaluation (TVEE) Method 1, as adopted

by the Tennessee Air Pollution Control Board on April 29, 1982, as amended on September 15, 1982 and August 24, 1984.

G11. Facility-wide Limitations

Not Applicable

G12. NSPS/NESHAP/MACT/GACT Standards

Not Applicable

G13. VOC and NO_x Emission Statement

Not Applicable

G14. Source Testing Requirements

Not Applicable

Section IV - Source Specific Permit Conditions

Source No	Source Description
02	EPS Foam Panel Imprinting and Gluing Operation

S2-1. Input Limitation(s) or Statement(s) of Design

Not Applicable

S2-2. Production Limitation(s)

The production rate of the garage doors produced is 300,000 doors per each period of 12-consecutive months. This is the maximum production rate of the process per the application dated November 3, 2020. Should the permittee need to modify the source in a manner that increases the capacity, a construction permit shall be applied for and received in accordance with TAPCR 1200-03-09-.01 prior to making the change.

TAPCR 1200-03-09-.03(8) and the application dated November 3, 2020.

Compliance Method: The permittee shall maintain a log of the actual number of doors produced during each calendar month and each period of 12-months. The log shall be retained in accordance with **Condition G8**.

Month, Year	Number of doors produced

S2-3. Operating Hour Limitation(s)

Not Applicable

S2-4. Emission Limitation(s)

- A. Particulate matter (PM) emitted from this source shall not exceed 0.02 grains per dry cubic foot of exhaust gases (0.002 pounds per hour, 0.01 tons per year).

TAPCR 1200-03-07-.04(1) and the application dated November 3, 2020.

Compliance Method: Compliance with this limit is demonstrated by the maximum design input capacity on the application dated November 3, 2020, and the visible emissions standard required in **Condition G10**.

- B. Volatile organic compounds (VOC) emitted from this source shall not exceed 4.98 tons during any period of twelve (12) consecutive months average basis.

TAPCR 1200-03-07-.07(2) and the application dated November 3, 2020.

Compliance Method: Purchase orders and/or invoices for all VOC and HAP-containing materials, along with current SDS, must be maintained and kept available for inspection by the Technical Secretary or a Division representative. The SDS must explicitly list the VOC and HAP content by weight for all VOC and HAP-containing materials. If SDS are not available with this information, vendor formulation data containing the required information for those materials must also be maintained. These records shall be kept in the format shown in Logs 1, 2, and 3 shown in **Appendix 7** or an alternative format, which readily provides the same required information. These records must be retained for a period of not less than five years. Scanned invoices (maintained electronically) may be used to fulfill this requirement. These records must be retained as required by **Condition G8**.

TAPCR 1200-03-10-.02(2)(a)

- C. Hazardous Air Pollutants (HAPs) emitted from this source shall not exceed 3.13 tons during any period of twelve (12) consecutive months.

TAPCR 1200-03-07-.07(2)

Compliance Method: Purchase orders and/or invoices for all VOC and HAP-containing materials, along with current SDS, must be maintained and kept available for inspection by the Technical Secretary or a Division representative. The SDS must explicitly list the VOC and HAP content by weight for all VOC and HAP-containing materials. If SDS are not available with this information, vendor formulation data containing the required information for those materials must also be maintained. These records shall be kept in the format shown in Logs 1 and 2 shown in **Appendix 7** or an alternative format, which readily provides the same required information. These records must be retained for a period of not less than five years. Scanned invoices (maintained electronically) may be used to fulfill this requirement. These records must be retained as required by **Condition G8**.

S2-5. Source-Specific Visible Emissions Limitation(s)

Not Applicable

(end of conditions)

The permit application gives the location of this source as 36.05565 Latitude and -85.52171 Longitude.

Appendix 1: Notification of Change in Responsible Person

Facility (Permittee) _____ Hormann LLC

Facility ID _____ 93-0118

Former Responsible Person _____
Name Title

New Responsible Person _____
Name Title

Email

Date New Responsible Person was assigned this duty: _____

As the Responsible Person of the above-mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

Appendix 2: Notification of Changes

Facility (Permittee) Hormann LLC

Facility ID 93-0118

Source No.

	Control Equipment	Stack Height (Feet)	Stack Diameter (Feet)	Exit Velocity (Feet/Second)	Exit Temperature (°F)
Current					
Proposed					
Current					
Proposed					
Current					
Proposed					

Comments:

As the Responsible Person of the above-mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

Appendix 3: Notification of Ownership Change

Facility (Permittee) Hormann LLC (Previous Owner)
Facility ID 93-0118
Facility (Permittee) _____ (New Owner)
Email Address _____
Secretary of State Control Number _____ [as registered with the TN Secretary of State]
Date of Ownership Change _____

Comments:

As the responsible person for the new owner or operator of the above-mentioned facility (permittee):

- I agree to not make any changes to the stationary source(s) that meet the definition of modification as defined in Division 1200-03 or Division 0400-30¹, and
- I agree to comply with the conditions contained in **the permits listed below**, Division 1200-03 and Division 0400-30 of the Tennessee Air Pollution Control Regulations, the Tennessee Air Quality Act, and any documented agreements made by the previous owner to the Technical Secretary.

List all active permits issued to the facility for which the owner wishes to assume ownership:

As the Responsible Person of the above-mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

¹ Appropriate application forms must be submitted prior to modification of the stationary source(s).

Appendix 4: Fees

All minor and conditional major source annual emission fees are due and payable to the Division in full according to SCHEDULE I below² unless otherwise specified in TAPCR 1200-03-26-.02(6)(c). The county that a source is located in determines when the minor source annual emission fee is due. Fees are due the first day of the month listed. If a source is located on contiguous property in more than one county, the county appearing earliest in the calendar year shall be used to determine the due date of the annual emission fee.

SCHEDULE I Month the Annual Emissions Fee is Due (Accounting Period) Counties in the Monthly Grouping

January	Anderson, Bedford, Benton, Bledsoe, Blount, Bradley and Campbell
February	Cannon, Carroll, Carter, Cheatham, Chester, Claiborne, Clay and Cocke
March	Coffee, Crockett, Cumberland, Davidson, Decatur, DeKalb, Dickson, Dyer and Fayette
April	Fentress, Franklin, Gibson, Giles, Grainger, Greene and Grundy
May	Hamblen, Hamilton, Hancock, Hardeman, Hardin, Hawkins, Haywood and Henderson
June	Henry, Hickman, Houston, Humphreys, Jackson, Jefferson, Johnson, Knox, Lake, Lauderdale, Lawrence and Lewis
July	Lincoln, Loudon, McMinn, McNairy, Macon and Madison
August	Marion, Marshall, Maury, Meigs, Monroe, Montgomery, Moore and Morgan
September	Obion, Overton, Perry, Pickett, Polk, Putnam and Rhea
October	Roane, Robertson, Rutherford, Scott, Sequatchie, Sevier, and Shelby
November	Smith, Stewart, Sullivan, Sumner, Tipton, Trousdale, Unicoi and Union
December	Van Buren, Warren, Washington, Wayne, Weakley, White, Williamson and Wilson

² Note that some sources with allowable emissions below specific thresholds are not subject to the requirement to pay annual emission fees. Contact the Emission Inventory Program at apc.inventory@tn.gov if you have any questions.

Appendix 5: Emission Statement for VOC and NO_x

Not Applicable

Appendix 6: Agreement Letters

Not Applicable

Appendix 7: Example Logs

Log 1 Monthly VOC and HAP Calculation Table

Month/Year:								Emissions					
[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]	[11]	[12]	[13]	[14]
Material ID	Material Name	Material Usage (gal/month or lb/mo)	Material Density (lb/gal)	VOC Content (wt% or lb VOC/gal)	HAP ₁ Content (wt% or lb HAP ₁ /gal)	HAP ₂ ¹ Content (wt% or lb HAP ₂ /gal)	Total HAP Content (wt% or lb HAP ₁ /gal)	VOC (lb/mo)	VOC (ton/mo)	HAP ₁ (lb/mo)	HAP ₁ (ton/mo)	Total HAP (lb/mo)	Total HAP (ton/mo)
Total													

¹ The columns for individual HAP should be repeated for each HAP contained in the materials used. Monthly emissions shall be calculated for each individual HAP. Identify each HAP by name and/or CAS# in the appropriate column headings.

[9] VOC Emissions (lb/mo) = [3] Material Usage (gal/mo) * [4] Material Density (lb/gal) * [5] VOC Content (wt%), or

[9] VOC Emissions (lb/mo) = [3] Material Usage (gal/mo) * [5] VOC Content (lb/gal)

[10] VOC Emissions (ton/mo) = [9] VOC Emissions (lb/mo) / 2,000 lb/ton

[11] HAP₁ Emissions (lb/mo) = [3] Material Usage (gal/mo) * [4] Material Density (lb/gal) * [6] HAP₁ Content (wt%), or

[11] HAP₁ Emissions (lb/mo) = [3] Material Usage (gal/mo) * [6] HAP₁ Content (lb/gal)

Log 2 Annual VOC and HAP Calculation Table

Month/Year	VOC		HAP ₁		HAP ₂		Total HAP	
	[10] (ton/mo)	(ton/12 consecutive mo) ¹	[11] (ton/mo) ²	(ton/12 consecutive mo)	(ton/mo) ²	(ton/12 consecutive mo)	[14] (ton/mo)	(ton/12 consecutive mo)

- ¹ The tons per 12-consecutive month values are the sum of the emissions in the 11 months preceding the month just completed + the emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this table, 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 [i.e., 6 (2) represents 6 tons emitted in 2 months].
- ² The columns for individual HAP should be repeated for each HAP contained in the materials used. Monthly emissions should be calculated for each individual HAP. Identify each HAP by name and/or CAS# in the appropriate column headings.

Appendix 8: Letters



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
(615) 532-0554 Voice or (615) 532-0614 FAX

December 19, 2018

Mr. Camron Rudd, President
Hormann LLC
5050 Baseline Road
Montgomery, IL 60538

Re: Construction Permit Application
420 Airport Road, Sparta, TN, 38583
Emission Source Reference No. 93-0118-01, 04 and 05/Log No. 74979

Dear Mr. Rudd:

The Division received your construction permit application for source 01: Forming Door Hardware, source 04: Custom Paint Application, and source 05: Pentane (blowing agent) Tank Recirculation Loop Component Fugitives on September 19, 2018. The information which you provided has undergone a preliminary review by the permit program.

It has been determined that these sources described in your application would constitute *insignificant activities or insignificant emissions units*, as defined in part 1200-03-09-.04(2)(a)3. of the Tennessee Air Pollution Control Regulations. Specifically, these operations would each result in potential emissions from each source of less than five (5) tons per year of each air contaminant and each regulated air pollutant that is not a hazardous air pollutant, and less than 1,000 pounds per year of each hazardous air pollutant.

Subparagraph 1200-03-09-.04(4)(a) of the Tennessee Air Pollution Control Regulations requires that the request for designation as an insignificant emission unit be made at least thirty (30) days prior to the estimated starting date of construction. Your application is accepted as the required notification. All applicable air pollution regulations must still be met by your facility.

If you have any questions concerning this correspondence, please contact Mr. Jerry Swinea at (615) 532-0639 or Jerry.Swinea@tn.gov. Your Facility ID is **93-0118**, please reference this number in any further correspondence with the Division.

Sincerely,

A handwritten signature in blue ink, appearing to read "James P. Johnston".

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