

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



**Amendment #1 to**

**Permit to Construct or Modify an Air Contaminant Source Issued Pursuant to Tennessee Air Quality Act**

Date Issued: January 3, 2019	Permit Number
Date Amended: November 30, 2020	Amendment 1 974979
Date Expires: January 03, 2023	Facility ID: 93-0118
Issued To: Hormann LLC	Installation Address 450 Airport Road Sparta
Installation Description Source 02: EPS Foam Panel Imprinting and Gluing Source 03: Polyurethane Foam Injection, Heat Tunnel and Sawing	Emission Source Reference No. 93-0118-02 and 03 True Minor

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).

**General Conditions**

- G1.** The application that was utilized in the preparation of this permit is dated September 17, 2018, and is signed by Camron Rudd, President for the permitted facility. If this person terminates their employment or is assigned different duties and 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 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.

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

(conditions continued on 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 AT INSTALLATION ADDRESS**

**G2. Visible and Fugitive Emissions**

- A. *Standard Method 9 Condition.* Visible emissions from this facility shall not exhibit greater than twenty percent opacity, except for one six-minute period in any one hour period, and for no more than four six-minute periods in any twenty-four 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).

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

- B. *Standard Fugitive Emissions Condition* 1) No person shall 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. Such reasonable precautions shall include, but not be 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 stock piles, 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.

2) No person shall cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five minutes per hour or twenty 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. 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.

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

- C. *Standard Roads and Parking Areas Condition* Visible emissions from roads and parking areas shall not exhibit greater than ten percent opacity 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.

TAPCR 1200-03-08-.03

**G3. Reserved.****G4. 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.

Tenn. Comp. R. & Regs. 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 two years. The date each maintenance and repair activity began shall be entered in the log no later than thirty days following the start of the repair or maintenance activity, and the completion date shall be entered in the log no later than thirty days from activity completion.

**G5. General Recordkeeping Requirements**

A. The following recordkeeping requirements shall apply to this facility:

- 1) For monthly recordkeeping, all data, including the results of all calculations, must be entered into the log no later than thirty days from the end of the month for which the data is required.
- 2) For weekly recordkeeping, all data, including the results of all calculations, must be entered into the log no later than seven days from the end of the week for which the data is required.
- 3) For daily recordkeeping, all data, including the results of all calculations, must be entered into the log no later than seven days from the end of the day for which the data is required.
- 4) All maintenance activities required by **Condition G4** (including any ongoing maintenance that has not been completed) shall be entered in the maintenance log no later than thirty days following the start of the maintenance.

B. Logs and records specified in this permit shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative and shall be retained for a period of not less than two years unless otherwise noted. Logs and records contained in this permit are based on a recommended format. Any logs that have an alternative format may be utilized provided such logs contain the same or equivalent information that is required. Computer-generated logs are also acceptable.

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

**G6. Other State and Federal Regulations**

This source shall comply with all applicable state and federal air pollution regulations. This includes, but is not limited to, all applicable provisions of the Tennessee Air Pollution Control Regulations, federal regulations published under 40 CFR 61 and 40 CFR 63 for sources of hazardous air pollutants, and federal regulations published under 40 CFR 60, New Source Performance Standards.

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

**G7. Startup, Shutdown, and Malfunction Requirements**

A. The facility must take all reasonable measures to keep emissions to a minimum during source startups, shutdowns, and malfunctions. These measures may include installation and use of alternate control systems, changes in operating methods or procedures, cessation of operation until the process equipment and/or air pollution control equipment is repaired, maintaining sufficient spare parts, use of overtime labor, use of outside consultants and contractors, and other appropriate means. 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 1200-03-20-.02(1)

B. **Monitoring Systems:** Due allowance for failure to monitor shall be made during any period of monitoring system malfunction, provided that the source owner or operator shows, to the satisfaction of the Technical Secretary, that the malfunction was unavoidable and is being repaired as expeditiously as practicable, and that a log of all such malfunctions is being kept by the owner or operator, including the time the malfunction began, when it was detected, what was wrong, what was done to correct the malfunction, and when the malfunction was corrected. 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 1200-03-10-.02(e)

**G8. Excursions**

All excursions from indicated parameter limits or ranges shall be recorded in a permanent suitable format and retained at the source location for a period of not less than two years.

The record of excursions shall include, at a minimum, the time the excursion was discovered, the corrective action taken, and the time that the process was back within the normal operating range.

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

“Excursion” shall mean a departure from an indicator range established for monitoring, consistent with any averaging period specified for averaging the results of the monitoring.

**G9. 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)

**G10. Permit Transference**

A. This permit is not transferable from one air contaminant source to another air contaminant source or from one location to another location.

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

B. In the event an ownership change occurs at this facility, written notification of the ownership change requesting a permit amendment must be submitted to the Technical Secretary no later than thirty days after the change occurs. This notification must include an agreement to abide by the terms of the permit, 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.

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

**G11. Operating Permit Application Submittal**

The permittee shall apply for an operating permit within thirty days of initial start-up of the first new or modified emission source. If construction of both sources cannot be completed and an operating permit application cannot be filed with the Technical Secretary by the expiration date of this permit, a permit extension request must be submitted in writing at least thirty days prior to the permit expiration date unless a different time frame is approved by the Technical Secretary. The application shall be delivered to the Division at the address listed below or via e-mail.

Tennessee Dept. of Environment & Conservation  
Division of Air Pollution Control  
Permitting Program  
William R. Snodgrass TN Tower, 15<sup>th</sup> Floor  
312 Rosa L. Parks Avenue  
Nashville, TN 37243

Adobe Portable Document Format (PDF)  
or Copy to: [Air.Pollution.Control@TN.gov](mailto:Air.Pollution.Control@TN.gov)

TAPCR 1200-03-09-.02(1) and 1200-03-09-.02(3)

**G12. Temporary Operating Permit**

- A. This permit shall serve as a temporary operating permit from the date of issuance to the receipt of a standard operating permit, provided that an operating permit application is filed in a timely manner as required by **Condition G11**.

TAPCR 1200-03-09-.02(2)

- B. Operation of each air contaminant source shall be in accordance with the provisions and stipulations set forth in the operating 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)

**G13. Fees**

This source 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 detailed in TAPCR 1200-03-26 of the Tennessee Air Pollution Control Regulations.

TAPCR 1200-03-26-.02

**G14. Reserved.**

**G15. Startup Certification**

The completed startup certification for Source 03 in Appendix 1 shall be submitted to the Permitting Program at the address listed below or via e-mail, no later than thirty days after each air contaminant source is started-up. A separate startup certification must be submitted for each source included in this permit.

Tennessee Dept. of Environment & Conservation  
Division of Air Pollution Control  
Permitting Program  
William R. Snodgrass TN Tower, 15<sup>th</sup> Floor  
312 Rosa L. Parks Avenue  
Nashville, TN 37243

or Adobe Portable Document Format (PDF)  
Copy to: [Air.Pollution.Control@TN.gov](mailto:Air.Pollution.Control@TN.gov)

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

Source Specific Conditions for Source 93-0118-02: EPS Foam Panel Imprinting and Gluing.

**S2-1. Reserved.**

**S2-2. Production Limitation**

The total stated production rate of the garage doors produced is 80,000 doors per year. This is the maximum production rate of the process per the application dated September 17, 2018.

TAPCR 1200-03-09-.01(1)(d) and the application dated September 17, 2018.

Compliance Method: The Technical Secretary may require proof of compliance with this rate. Any increase in this rate will require a construction permit. Compliance with the production limitation shall be demonstrated by maintaining an annual, calendar year, log of the number of doors produced in a form that readily shows compliance with this condition (see example below). Yearly data must be entered in the log no later than thirty days from the end of the year for which the data is required. This log must be maintained at the source location and kept available for inspection by the Technical Secretary or representative. The log must be retained for a period of not less than two years.

Year	Number of doors produced

**S2-3. Reserved.**

**S2-4. Emission Limitations**

- A. Particulate matter (PM) emitted from this source shall not exceed 0.02 grains per dry standard cubic foot of exhaust gases (1.82 pounds per hour, 7.96 tons per year).

TAPCR 1200-03-07-.04(1) and the application dated September 17, 2018.

Compliance method Compliance with this limit is demonstrated by the maximum design input capacity on the application dated September 17, 2018, the visible emissions standard required in **Condition G2**.

- B. Volatile organic compounds (VOC) emitted from this source shall not exceed 4.89 tons during any period of twelve consecutive months.

TAPCR 1200-03-07-.07(2) and the application dated September 17, 2018

Compliance Method: Compliance with the VOC emission limitation shall be demonstrated with the as-supplied VOC content of all VOC-containing materials and the as-supplied HAP content of all HAP-containing materials to be used by this facility shall be determined from Safety Data Sheets (SDS) or manufacturer or vendor formulation data which explicitly list the VOC and HAP content by weight. These records shall be kept in the format shown in the following logs or an alternative format, which readily provides the same required information. These records must be maintained at the source location and kept available for inspection by the Technical Secretary or a representative. These records must be retained as required by **Condition G5**.

## LOG 1

Material Name*	Density (lb/gal)	VOC Content (weight %)	HAP 1* Content (weight %)	HAP 2 Content (weight %)	Total HAP Content (weight %)

\* This table may be expanded to include additional materials and HAP as required, and VOC and HAP content may be kept in pounds per gallon

## LOG 2 MONTHLY VOC/HAP EMISSIONS LOG FOR SOURCE 93-0118-02

MONTH:

MATERIAL NAME	USAGE (gallons per month (gpm))	VOC CONTENT (pounds VOC per gallon)	VOC EMISSIONS (tons VOC per month)	HAP <sub>1</sub> CONTENT (pounds HAP <sub>1</sub> per gallon)	HAP <sub>1</sub> EMISSIONS (tons HAP <sub>1</sub> per month)	HAP <sub>p</sub> CONTENT (pounds HAP <sub>p</sub> per gallon)	HAP <sub>p</sub> EMISSIONS (tons HAP <sub>p</sub> per month)	TOTAL HAP EMISSIONS (tons HAP <sub>1</sub> thru HAP <sub>p</sub> per month)
TOTAL								

Note: p = 1, 2, 3,..... n = the number of different hazardous air pollutants. Use columns as required for the number of different hazardous air pollutants.

## LOG 3 YEARLY VOC/HAP EMISSIONS LOG FOR SOURCE 93-0118-02

MONTH/YEAR (Fee Accounting Period is July 1, year to June 30, year)	VOC EMISSIONS (tons VOC per month)	(*)VOC EMISSIONS (tons VOC per 12 months)	TOTAL HAP EMISSIONS (tons HAP <sub>1</sub> thru HAP <sub>p</sub> per month)	(*)TOTAL HAP EMISSIONS (tons HAP <sub>1</sub> thru HAP <sub>p</sub> per 12 months)	INDIVIDUAL HAP EMISSIONS (tons HAP <sub>1</sub> thru HAP <sub>p</sub> per month)	(*)INDIVIDUAL HAP EMISSIONS (tons HAP <sub>1</sub> thru HAP <sub>p</sub> per 12 months)
July/year						
Aug/year, etc						
June/year						

(\*) The Tons per 12 Month value is the sum of the VOC (or HAP) emissions in the 11 months preceding the month just completed + the VOC (or HAP) emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this log, 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, that is, 6 (2) represents 6 tons emitted in 2 months.

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

TAPCR 1200-03-07-.07(2)- and the application dated September 17, 2018

Compliance Method: Compliance with the HAPS emission limitation shall be demonstrated with the as-supplied VOC content of all VOC-containing materials and the as-supplied HAP content of all HAP-containing materials to be used by this facility. HAP and VOC content shall be determined from Safety Data Sheets (SDS) or manufacturer or vendor formulation data which explicitly lists the VOC and HAP content by weight. These records shall be kept in the format shown in the logs in **Condition S2-4(B)** or an alternative format, which readily provides the same required information. These records must be maintained at the source location and kept available for inspection by the Technical Secretary or a representative. These records must be retained as required by **Condition G5**.

**S2-5. Reserved.**

**S2-6. Reserved.**

## Source Specific Conditions for Source 93-0118-03: Polyurethane Foam Injection, Heat Tunnel and Sawing

**S3-1. Reserved.****S3-2. Production Limitation**

The total stated production rate of the garage doors produced is 80,000 doors per year. This is the maximum production rate of the process per the application dated September 17, 2018.

TAPCR 1200-03-09-.01(1)(d) and the application dated September 17, 2018.

Compliance Method: The Technical Secretary may require proof of compliance with this rate. Any increase in this rate will require a construction permit. Compliance with the production limitation shall be demonstrated by maintaining an annual log as required in **Condition S2-2**.

**S3-3. Reserved.****S3-4. Emission Limitations**

- A. Particulate matter (PM) emitted from this source shall not exceed 0.02 grains per dry standard cubic foot of exhaust gases (0.59 pounds per hour, 2.57 tons per year).

TAPCR 1200-03-07-.04(1) and the application dated September 17, 2018.

Compliance method: Compliance with this limitation shall be assured by operating the control equipment as tested and by maintaining the control equipment in good working order by properly maintaining the unit per the manufacturer's recommendation. Maintenance records shall be kept in accordance with **Condition G4**.

- B. Volatile organic compounds (VOC) emitted from this source shall not 25.87 tons during any period of twelve consecutive months.

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

Compliance Method: Compliance with the VOC emission limitation shall be demonstrated by recording the pounds of raw material processed, the percent weight of pentane (VOC), and calculating the actual quantities of VOC emitted from this source during each month and during any period of twelve consecutive months. The permittee shall maintain records of these emissions in a form that readily shows compliance with the VOC emission limitation (see example below). These logs must be retained for a period of not less than two years.

In addition to the VOCs emitted from the polyurethane foam injection, a total of 0.51 tons from sawing activities shall be added to the 12-consecutive month total.

Log 4 Yearly VOC Emission Log for 93-0118-03

Year \_\_\_\_\_

Month	Raw Material		Monthly VOC Emissions(*)		Consecutive 12-month VOC Emissions
	Pounds of Raw Material	Weight % of Pentane	Pounds of VOC emitted	Tons of VOC emitted	Tons of VOC emitted per 12-month period (**)



January					
February					
March					
April					
May					
etc.					

(\*) Actual VOC emission rate each month is calculated by multiplying the pounds of raw polyurethane processed by the weight percent of pentane. One hundred percent loss of pentane shall be assumed due to evaporative loss during sequential operations encompassing processing, storage, and handling.

**S3-5. Reserved.**

**S3-6. Reserved.**

(End of conditions)

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

Amendment 1 (issued November 30, 2020): The expiration date was extended based on letter dated November 3, 2020 to accommodate extra time needed to construct source 03. The address was updated. Also made some formatting changes.

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Appendix 1: Startup Certification

Start Up Certification – submit one for each source included in this permit

**Start Up Certification for Source \_93-\_\_0118-\_03\_\_**

The permittee shall certify the initial start-up date(s) of the new or modified air contaminant source(s) regulated by this permit by submitting

**A COPY OF THE FRONT PAGE OF THIS PERMIT,**

with the information required in A) and B) of this certification completed, to the Technical Secretary's representatives listed below:

A)     DATE OF INITIAL START-UP: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
month    day    year

B)     Anticipated operating rate: \_\_\_\_\_ percent of maximum rated capacity

For the purpose of complying with this condition, "initial start-up" of the air contaminant source shall be the date the new or modified source began operation for the production of product for sale, use as raw materials, or steam or heat production under the terms of this permit.

The undersigned affirms that this person has the full authority to represent and bind the permittee in environmental permitting affairs. The undersigned further affirms that the above provided information is true to the best of his/her knowledge and belief.

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

Note: This certification is not an application for an operating permit. At a minimum, the appropriate application form, usually an APC-100, must be submitted requesting an operating permit. The application must be submitted in accordance with the requirements of this permit.

The completed certification shall be submitted to the Permit Program at the address listed below or via e-mail, no later than thirty days after the air contaminant source is started-up.

TN Dept. of Environment and Conservation  
Attn: Permit Program  
Division of Air Pollution Control  
William R. Snodgrass TN Tower, 15<sup>th</sup> Floor  
312 Rosa L. Parks Avenue  
Nashville, TN 37243

Adobe Portable Document Format (PDF)  
or     Copy to: [Air.Pollution.Control@TN.gov](mailto:Air.Pollution.Control@TN.gov)

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

Start Up Certification – submit one for each source included in this permit

**Start Up Certification for Source 93- 0118- 02**

The permittee shall certify the initial start-up date(s) of the new or modified air contaminant source(s) regulated by this permit by submitting


A COPY OF THE FRONT PAGE OF THIS PERMIT,  
with the information required in A) and B) of this certification completed, to the Technical Secretary's representatives listed below:

A) DATE OF INITIAL START-UP: 10 / 05 / 2020  
month day year

B) Anticipated operating rate: 10 percent of maximum rated capacity

For the purpose of complying with this condition, "initial start-up" of the air contaminant source shall be the date the new or modified source began operation for the production of product for sale, use as raw materials, or steam or heat production under the terms of this permit.

The undersigned affirms that this person has the full authority to represent and bind the permittee in environmental permitting affairs. The undersigned further affirms that the above provided information is true to the best of his/her knowledge and belief.

Signature 		Date <u>3 Nov. 2020</u>
Signer's name (type or print) <u>Cameron Rudd</u>	Title <u>President, Hormann LLC</u>	Phone (with area code) <u>630-518-0623</u>

Note: This certification is not an application for an operating permit. At a minimum, the appropriate application form, usually an APC-100, must be submitted requesting an operating permit. The application must be submitted in accordance with the requirements of this permit.

The completed certification shall be submitted to the Permit Program at the address listed below or via e-mail, no later than thirty (30) days after the air contaminant source is started-up.

TN Dept. of Environment and Conservation  
Attn: Permit Program  
Division of Air Pollution Control  
William R. Snodgrass TN Tower, 15<sup>th</sup> Floor  
312 Rosa L. Parks Avenue  
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Tenn. Comp. R. & Regs. 1200-03-09-.02(3)(b)

(end of conditions)

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

Rev. 3/8/2018

RDA-1298