

TN. DIV. OF  
AIR POLLUTION CONTROL

2012 AUG 30 PM 2:18

Thomas & Betts Corporation  
Electrical Division  
260 Dennis Street  
Athens, Tennessee 37303  
(423) 745-6588  
Facsimile (423) 745-9545

**Thomas & Betts**

RECEIVED

August 28, 2012

surrendered  
059760P

Mr. Randy Thompson  
Division of Air Pollution Control  
Tennessee Department of Environment and Conservation  
9<sup>th</sup> Floor L&C Annex  
401 Church Street  
Nashville, TN 37243-1531

Mr. Thompson,

This letter is a follow-up to the discussion that I had with you last week concerning Air Permit # 059760P for a paint booth at the Thomas & Betts' Athens, TN manufacturing facility. A copy of the permit is enclosed.

This permit was originally issued when our plant ran a continuous surface coating operation through a paint booth. Several years ago, the surface coating operation was dis-continued but we maintained the permit in "active" status with the assumption that we might re-start this operation at anytime. During the interim, we have been using the paint booth for "touch up" work only with aerosol spray paint cans.

Based on our discussion last week and further review of our manufacturing operations, it has been determined that we no longer anticipate re-starting the continuous surface coating operation and that we should return Air Permit # 059760P back to the State of Tennessee for closure. If, at some time in the future, it is determined to re-start this operation, then we will apply for a new air permit.

Continuing to use our paint booth for "touch up" work with aerosol spray paint cans should be considered an "insignificant activity" under Rule 1200-03-09-.04 (5) (f) 46, because this activity will emit less than 5 tons per year of any regulated air pollutants and less than 1,000 pounds per year of any hazardous air pollutants. Last week you stated that permitting of this insignificant activity is not required.

(continued)

I appreciate your assistance in helping me work through this issue. Please contact me at (423) 745-6588 ext. 309 or [joseph.mccall@tnb.com](mailto:joseph.mccall@tnb.com) if you have any questions.

*Joseph A McCall for T&B*  
Joseph A. McCall  
Environmental Compliance Officer

cc: Don Davis, TDEC-Chattanooga  
Om Chopra, T&B-Memphis  
Darrell Dumont, T&B-Athens

Enclosure: Air Permit No. 059760P

TENNESSEE AIR POLLUTION CONTROL BOARD  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
NASHVILLE, TENNESSEE 37243-1531



**OPERATING PERMIT** Issued Pursuant to Tennessee Air Quality Act

Date Issued:

JUN 28 2006

Permit Number:

059760P

Date Expires: July 1, 2015

Issued To:

Thomas & Betts Corporation

Installation Address:

260 Dennis Street  
Athens

Installation Description:

Surface Coating Operation with  
Exhaust Filter Control

Emission Source Reference No.

54-0047-02

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 is dated May 9, 2006 and signed by Herb Bradshaw, Plant Manager of the permitted facility. If this person terminates 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 (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.

(conditions continued on the 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.

NON-TRANSFERABLE

POST AT INSTALLATION ADDRESS

2. Volatile Organic Compounds (VOC) excluding water emitted from this source shall not exceed 5.46 tons during all intervals of twelve (12) consecutive months.
3. The as-supplied VOC content of all VOC-containing materials to be used by this source shall be determined as follows:

All Adhesives, Coatings, Thinners and Clean-up Solvents - from Material Safety Data Sheets (MSDS) or manufacturer or vendor formulation data which explicitly lists the VOC content by weight.

The results of these determinations shall be compiled in the following tabular format or an alternative format approved in writing by the Technical Secretary. This table, along with MSDS or other supporting documentation for each material to be used, shall be maintained at the source location and made available for inspection by the Technical Secretary or his representative, beginning within thirty (30) days of the issued date of this permit. If new materials are used, or if material formulation is changed, the table shall be updated within ninety (90) days from the initial date of usage of the new or altered material.

Process Material Description	Material Density (lb/gal)	VOC Content (lb/gal)
Material #1		
Material #2		
etc.		

4. Visible emissions from this source shall not exhibit greater than twenty (20) percent 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). TAPCR 1200-3-5-.03(6) and TAPCR 1200-3-5-.01(1)
5. The maximum emission rate from this facility for any single hazardous air pollutant (HAP), listed pursuant to Section 112(b) of the Federal Act, shall not exceed 9.9 tons per year. Total emissions of all HAPs from this facility shall not exceed 24.9 tons per year.
6. In the event that the emission rates from this source are ten (10) tons per year or more for any single HAP, or twenty-five (25) tons per year or more for total HAPs, the permittee shall provide written notification of the exceedance(s) to the Technical Secretary within fifteen (15) days from the date of discovery.

(conditions continued on next page)

7. The permittee shall calculate the actual quantities of VOC and HAPs emitted from this facility during each calendar month and during each twelve (12) month period. The permittee shall maintain records of these emissions in a form that readily shows compliance with **Conditions 2 and 5** of this permit. (See example below) Monthly data, including all required calculations, must be entered in the monthly production log not later than thirty (30) days from the end of the month for which the data is required. These logs must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. These logs must be retained for a period of not less than two (2) years.

## MONTHLY VOC/HAP EMISSIONS LOG

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)
Material <sub>1</sub>								
Material <sub>2</sub>								
Material <sub>i</sub>								
TOTAL								

Note:  $i = 1, 2, 3, \dots, n$  = the number of different materials, and  $p = 1, 2, 3, \dots, n$  = the number of different hazardous air pollutants. Use columns as required for the number of different hazardous air pollutants.

## YEARLY VOC/HAP EMISSIONS LOG

Month, Year	VOC Emissions (tons VOC per month)	(*)VOC Emissions (tons VOC per 12 months)	HAP <sub>1</sub> Emissions (tons HAP <sub>1</sub> per month)	(*)HAP <sub>1</sub> Emissions (tons HAP <sub>1</sub> per 12 months)	HAP <sub>p</sub> Emissions (tons HAP <sub>p</sub> per month)	(*)HAP <sub>p</sub> Emissions (tons HAP <sub>p</sub> per 12 months)	Total HAP Emissions (tons HAP <sub>1</sub> through HAP <sub>p</sub> per month)	(*)Total HAP Emissions (tons HAP <sub>1</sub> through HAP <sub>p</sub> per 12 months)
January, Year								
February, Year								
etc.								

(\*) 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.

8. Particulate matter (TSP) emitted from this source shall not exceed 0.02 grains per dry standard cubic foot (0.49 pounds per hour). This emission limitation is established pursuant to Rule 1200-3-7-.04(1) of the Tennessee Air Pollution Control Regulations.
9. The issuance of this permit supercedes any permit(s) previously issued for this air contaminant source.
10. The permittee shall apply for renewal of this permit not less than sixty (60) days prior to the permit's expiration pursuant to Division Rule 1200-3-9-.02(3).

(end of conditions)