



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

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Date Issued: November 15, 2011  
Date Amended: January 19, 2016  
Date Expires: June 1, 2021

Permit Number:  
064587P

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Issued To:  
Setco Automotive, N.A., Inc.

Installation Address:  
1731 Mineral Wells Avenue  
Paris

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Installation Description:  
PES # 2 & PES # 3: Spray Booths (Electrostatic)  
Coating Actuator Brake Units  
Exhaust Filter Control

Emission Source Reference No.  
40-0070-03  
40 CFR Part 63, Subpart  
HHHHHH  
(combines previous pt.02 with 03)

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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 3, 2011 and is signed by John E. Cross, Operations Manager for the permitted facility. Gary Flood is now the responsible official as per the letter dated January 6, 2016 from the facility. If this person terminates employment or is reassigned 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 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. 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. Volatile Organic Compounds (VOCs) emitted from this source shall not exceed 4.5 tons during any interval of 12 consecutive months on a 12 month rolling total basis. This condition established pursuant to TAPCR 1200-03-07-.07(2)
4. Particulate emissions (TSP) from the facility stack serving this source shall not exceed 0.02 grains per dry standard cubic foot or 3.3 pounds per hour (14.4 T/yr). TAPCR 1200-03-07-.04(1)
5. The maximum emission rate from the entire facility for any single hazardous air pollutant (HAP), listed pursuant to Section 112(b) of the Federal Act, shall not exceed 9.9 ton per year. Total emissions of all HAPs from the entire facility shall not exceed 24.9 ton per year. In the event that the emission rates from the entire facility exceed these limits, the permittee shall provide written notification of the exceedance(s) to the Technical Secretary within fifteen (15) days from the date of discovery.
6. Records of the VOC and HAP emissions in tons per month and on a 12 month rolling total basis must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. This record must be retained for a period of not less than two years. Compliance with this condition may be demonstrated by compliance with conditions 7 and 8 (Log 1 and Log 2).
7. 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 source shall be determined from Material Safety Data Sheets (MSDS) or manufacturer or vendor formulation data, which explicitly list the VOC and HAP content by weight. The results of these determinations shall be compiled in the following tabular format or an alternative format, which readily provides the same required information. This log, along with MSDS or other supporting documentation for each material used, shall be maintained at the source location and made available for inspection by the Technical Secretary or his representative. If new materials are used, or if material formulation is changed, the table shall be updated within 90 days from the initial date of usage of the new or altered material.

LOG 1

MONTHLY LOG

Month \_\_\_\_\_ Year \_\_\_\_\_

<b>Material Name<sup>(1)</sup></b>	<b>Density (lb/gal)</b>	<b>VOC Content (lb/gal)</b>	<b>HAP#1<sup>(1)</sup> Content (lb/gal)</b>	<b>HAP#2 Content (lb/gal)</b>	<b>Total HAP Content (lb/gal)</b>

(1) This table may be expanded to include additional materials and HAPs as required.

8. The permittee shall calculate the actual quantities of VOC and HAPs emitted from spray booths during each calendar month and maintain records of these emissions in a form that readily shows compliance with Conditions 3, 5 and 6 of this permit. (See example below) This log 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. All data, including all required calculations, must be entered in the log no later than 30 days from the end of the month for which the data is required.

LOG 2

YEARLY LOG

Year \_\_\_\_\_

Month/Year	VOC Emissions (ton/mo)	VOC Emissions (tons per 12 months)**	HAP#1 Emissions (ton/mo)	HAP#1 Emissions (tons per 12 months)**	Total HAP Emissions (ton/mo)	Total HAP Emissions (tons per 12 months)**

\*This table may be expanded to include additional HAP as required.

\*\* The tons per 12 months value is the sum of the VOC (or single HAP or Total HAP) emissions in the 11 months preceding the month just completed plus the VOC (or single HAP or Total HAP) 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.

9. Regarding recordkeeping of logs, the following is applicable:
- (a) For sources required to maintain monthly logs:  
All data, including all required calculations, must be entered in the log no later than thirty (30) days from the end of the month for which the data is required.
  - (b) For sources required to maintain weekly logs:  
All data, including all required calculations, must be entered in the log no later than seven (7) days from the end of the week for which the data is required.
  - (c) For sources required to maintain daily logs:  
All data, including all required calculations, must be entered into the log no later than seven (7) days from the end of the day for which the data is required.
10. 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).
11. 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.

12. Fugitive emissions from this source shall be controlled as specified in Rule 1200-03-08-.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.
13. Reports (if required by Condition 19) 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  
15<sup>th</sup> Floor, William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue  
Nashville, TN 37243**

**OR  
Air.Pollution.Control@tn.gov**

14. This permit is valid only at this location. TAPCR 1200-03-09-.03(6)
15. This source shall operate in accordance with the terms of this permit and the information submitted in the approved permit application. TAPCR 1200-03-09-.02(6)
16. This source shall comply with all applicable state and federal air pollution regulations. This includes, but is not limited to, federal regulations published under 40 CFR 63 for sources of hazardous air pollutants and 40 CFR 60, New Source Performance Standards. TAPCR 1200-03-09-.03(8)
17. The issuance of this operating permit supersedes all previously issued permit(s) for this air contaminant source. TAPCR 1200-03-09-.02(6)
18. 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 1200-03-09-.02(3). The renewal application shall be delivered to the West Tennessee Permit Program at the address listed below or via e-mail

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

Adobe Portable Document Format (PDF) Copy  
to:  
Air.Pollution.Control@tn.gov

19. The permittee must comply with recordkeeping and reporting requirements, as found in the following table:

**Compliance Methods for Recordkeeping and Reporting**

Operation	Compliance Method
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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"> <li>• Painter training certifications with training dates</li> <li>• Spray booth filter efficiency documentation</li> <li>• Spray gun transfer efficiency</li> <li>• Material Safety Data Sheets (MSDS) of all coatings, thinners, solvents, and other materials used at this source</li> <li>• Annual usage of Methylene Chloride, if applicable</li> <li>• Written copy of Methylene Chloride (MeCl) Minimization Plan if more than one ton per year of MeCl used, as applicable</li> <li>• Deviation and corrective action documentation</li> <li>• Routine maintenance of air pollution control device(s).</li> </ul>
Reporting	<p>In the event there is a change at the business (including meeting Rule requirements), an Annual Notification of Changes report is required by March 1<sup>st</sup> of each calendar year following the calendar year in which the changes or noncompliance occurred. The Annual Notification of Changes report shall include:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Reportable changes occurring to previously submitted notification forms, including Initial Notification, Notification of Compliance Status, and previous Annual Notification of Changes reports.</li> <li>• Deviations from recordkeeping requirements.</li> <li>• Site address of source included in this permit</li> </ul> <p>The Annual Notification of Changes report is required if there are any changes to this source including, but not limited to, the following:</p> <ul style="list-style-type: none"> <li>• information previously submitted in either the initial notification required by § 63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed;</li> <li>• deviations from the relevant requirements in § 63.11173(a) through (d) or § 63.11173(e) through (g), of this Rule, on the date of the report will be deemed to be a change, including notification when paint stripping affected sources that have not developed and implemented a written MeCl minimization plan in accordance with § 63.11173(b) used more than one ton of MeCl in the previous calendar year;</li> </ul> <p>An Annual Notification of Changes report is not required if there have been no changes to the source, as described above.</p>

20. 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"> <li>1. Exhaust filters to achieve at least 98% capture efficiency.</li> <li>2. Must have full roof.</li> </ol>

	<ol style="list-style-type: none"> <li>3. Must have at least three (3) complete walls or side curtains.</li> <li>4. Ventilated so that air is drawn into the booth</li> <li>5. When refinishing motor vehicles or mobile equipment, the work area must be fully enclosed and ventilated at the proper pressure.</li> <li>6. Mobile ventilated enclosures for spot repairs must be fully enclosed with overspray retained and directed to a filter for capture.</li> </ol>
II. Spray Gun(s)	<ol style="list-style-type: none"> <li>1. Must be high-volume, low-pressure (HVLV), or</li> <li>2. Electrostatic application, or</li> <li>3. Airless or air-assisted spray gun, or</li> <li>4. An equivalent technology</li> </ol>
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"> <li>1. This source must train and certify all painters on: <ul style="list-style-type: none"> <li>• Spray gun equipment selection</li> <li>• Spray techniques</li> <li>• Maintenance</li> <li>• Environmental compliance with the requirements of 40 CFR 63 Subpart HHHHHH.</li> </ul> </li> <li>2. Employee training and certification is required no later than 180 days after date of hire.</li> <li>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.</li> <li>4. Painters must complete a refresher course and recertify every five years.</li> </ol>

(end of conditions)

This permit application gives the location of this source as 36.276209 Latitude and 88.301455 Longitude.

This permit was amended on the permittee's request to add HHHHHH requirements and to combine Source 02 and Source 03 since the two spray booths share a single paint applicator with one reservoir. Previous Source 40-0070-02 has been combined with Source 40-0070-03 and is now designated as Source 40-0070-03.