

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



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

Date Issued: April 21, 2016

Permit Number:  
071391P

Date Expires: July 01, 2025

Issued To:  
Thomas & Betts Corporation

Installation Address:  
260 Dennis Street  
Athens

Installation Description:  
Electroplating Line Dip Tanks  
with a Wet Packed-Bed Scrubber Control

Emission Source Reference No.  
54-0047-08  
NESHAP (Subpart WWWWWW)

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).

**CONDITIONS:**

1. The application that was utilized in the preparation of this permit is dated February 12, 2016, and signed by Chuck Gilreath, Group Plant Manager of the permitted 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. 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.

NON-TRANSFERABLE

**POST AT INSTALLATION ADDRESS**

2. This source shall be operated in compliance with all applicable requirements of 40 CFR Part 63, Subpart WWWW (6W) – National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, including, but not limited to, **Conditions 3** through **7**.
3. Pursuant to 40 CFR §63.11507(g), the permittee of an affected existing plating and polishing process unit that contains, applies, or emits one or more of the plating and polishing metal HAPs, applicable management practices listed in paragraphs (a) through (l) of this condition, must be implemented as practicable.
  - (a) Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.
  - (b) Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable.
  - (c) Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable.
  - (d) Use tank covers, if already owned and available at the facility, whenever practicable.
  - (e) Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).
  - (f) Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.
  - (g) Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable.
  - (h) Maintain quality control of chemicals all bath ingredient concentrations in the tanks, as practicable.
  - (i) Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.
  - (j) Minimize spills and overflow of tanks, as practicable.
  - (k) Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.
  - (l) Perform regular inspections to identify leaks and other opportunities for pollution prevention.
4. Pursuant to 40 CFR §63.11508(b), the permittee must be in compliance with the applicable management practices and equipment standards in 40 CFR Part 63 Subpart 6W at all times.
5. Pursuant to 40 CFR §63.11508(d), in order to demonstrate continuous compliance with the applicable management practices and equipment standards, specified in 40 CFR Part 63 Subpart 6W, the permittee must satisfy the requirements specified in paragraphs (a) through (d) of this condition.
  - (a) The air pollution control equipment must be maintained and in operation during the operation of the affected source;
  - (b) The permittee must prepare an annual compliance certification according to the requirements specified in §63.11509(c), “Notification, Reporting, and Recordkeeping,” and kept it in a readily-accessible location for inspector review.
  - (c) The permittee must demonstrate continuous compliance with the applicable management practices stated in **Condition 3** according to provisions (i) and (ii).
    - (i) The permittee must implement the applicable management practices during all times that the affected tank or process is in operation.
    - (ii) The permittee must state in the annual compliance certification that the applicable management practices have been implemented, as practicable.

6. Pursuant to 40 CFR §63.11509(e), the permittee must keep the records specified in paragraphs (a) through (c) of this condition.
- (a) A copy of any Initial Notification and Notification of Compliance Status that was submitted and all documentation supporting those notifications.
  - (b) The records specified in 40 CFR §63.10(b)(2)(i) through (iii) and (xiv) of the General Provisions of 40 CFR Part 63.
  - (c) The records required to show continuous compliance with each management practice and equipment standard that applies, as specified in 40 CFR §63.11508(d).
7. Pursuant to 40 CFR §63.10(b)(1), the permittee of an affected source subject to the provisions of 40 CFR Part 63 shall maintain files of all information (including all reports and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.
8. Total volatile organic compounds (VOC) emitted from this source shall not exceed 0.007 tons per any twelve (12) consecutive months. Compliance with this Condition will be verified through compliance with **Condition 11**. TAPCR 1200-03-07-.07(2)
9. Hydrogen chloride (HCl) emitted from this source shall not exceed 0.034 tons per any twelve (12) consecutive months. Compliance with this Condition will be assured by compliance with **Condition 11**. TAPCR 1200-03-07-.07(2)
10. The as-supplied VOC, Hazardous Air Pollutant (HAP), and solids content of all VOC, HAP, and solids containing materials to be used by this source shall be determined as follows:

All Coatings, Thinners, and Solvents – from Material Safety Data Sheets (MSDS) or manufacturer or vendor formulation data which explicitly list the VOC, HAP, and solids 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 table, 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 30 days from the initial date of usage of the new or altered material. These logs must be retained for a period of not less than two (2) years. TAPCR 1200-03-10-.02(2)

<b>Log 1: As-Supplied VOC, HAP, and Solids Content to Source 54-0047-08</b>					
Process Material Description	Date of Initial Usage	Material Density (lb/gal)	VOC Content (lb/gal)	HAP Content (lb/gal)	Solids Content (lb/gal)
Material #1					
Material #2*					

\*This table may be expanded to include additional materials and/or HAPs as required

11. Routine maintenance, as required to maintain specified emission limits, 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 two (2) years.  
TAPCR 1200-03-10-.02(2)(a)
12. Visible emissions from this source not covered by **Condition 13** shall not exceed 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).  
TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.01(1)
13. 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 1200-03-20. 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.
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. 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(3) and the application dated February 12, 2016.
18. The issuance of this operating permit supersedes all previously issued permit(s) for this air contaminant source. TAPCR 1200-03-09-.02(6)
19. The permittee shall apply for renewal of this permit not less than sixty (60) days prior to the permit's expiration date pursuant to Division Rule 1200-03-09-.02(3)(b). The renewal application shall be submitted to the Division at the address listed below or by electronic pdf copy via e-mail.

Tennessee Division of Air Pollution Control  
William R. Snodgrass Tennessee 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)

(end of conditions)

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The permit application gives the location of this source as 35.457389 Latitude and -84.604261 Longitude.