



**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**

March 11, 2022

Brad Russom Motor Company
Mr. Brad Russom
P.O. Box 448
Rutherford, TN 38369

Re: Facility ID # 27-0227
Permit Number: 065409P

Dear Mr. Russom or responsible official:

The Division of Air Pollution Control is completing file reviews to identify permits approaching their expiration date. It has come to our attention that permit number **065409P** is due to expire **August 16, 2022**.

Pursuant to Tennessee Comprehensive Rules and Regulations 1200-03-09.02(3)(a), an application for an operating permit shall be filed with the Technical Secretary not less than sixty (60) days prior to the expiration of an existing operating permit. Therefore, the deadline to submit a Notice of Intent or renewal application is **June 17, 2022**.

The Division recently implemented Permit-by-Rule (PBR) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH (6H). Rather than applying for a site-specific permit, motor vehicle and mobile equipment surface coating facility owners can now instead opt to be covered by PBR. PBR is not a permit, but it does satisfy permitting requirements. This option allows owners of such facilities to submit a Notice of Intent for authorization under Permit-by-Rule, and receive a Notice of Authorization (NOA) to construct, modify, or operate their motor vehicle and mobile equipment surface coating facility. **The Notice of Authorization will take the place of the permit that was previously written specifically for your facility.** The advantage of using PBR is that the NOA is valid for the life of the source without having to worry about periodic renewals, and there are currently no associated application fees or annual emission fee assessments.

The Notice of Intent APC 202 form (CN-1514), may be submitted via email to Air.Pollution.Control@tn.gov. The submittals must be signed, dated, and in PDF format. Please include your Facility ID as well. If preferred, paper documents can be mailed to the Technical Secretary at the address included on the form. An APC 202 Notice of Intent form is enclosed for your convenience, and can also be downloaded from the Division's website by visiting: <https://www.tn.gov/content/tn/environment/program-areas/sbeap-small-business-environmental-assistance/permit-by-rule.html>

Additional information for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources can be found by visiting:

<https://www.tn.gov/environment/program-areas/sbeap-small-business-environmental-assistance/sbeap-paints-painting/sbeap-paints-painting/surface-coating-and-paint-stripping.html>

Note: In addition to the Permit-by-Rule or permitting requirements of 6H, all Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources must also meet the requirements of Tennessee Comprehensive Rules and Regulations 1200-03-09.

If assistance is needed, or if you prefer the option to submit a renewal application, the Small Business Environmental Assistance Program (SBEAP) is a free, confidential, technical program within TDEC that can help. This program is able to assist with completing applications including calculations as well as any other environmental questions that a small business may have. The SBEAP can be contacted at **800-734-3619** or by email at BGSBEAP@tn.gov.

Sincerely,

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

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

Tell us how we're doing. <http://tn.gov/environment/article/contact-tdec-customer-service-form>