CERTIFIED Z 334 996 791

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Tennessee Division of Air Pollution Control
9th Floor, L & C Annex
401 Church Street
Nashville, Tennessee 37243-1531

September 16, 1999

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Z 334 996 790

Mr. John H. Hankinson, Jr.
Regional Administrator
United States Environmental Protection Agency
Region 4
APTMD – 12th Floor
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

Subject: Official Submittal of Request for the Nonregulatory Portion of the State Implementation Plan Revisions for the Kingsport Additional Control Area – Revised Operating Permits for Willamette Industries, Inc. – Additional Information submitted in Response to EPA Letters of March 26, 1998 and July 14, 1999

Dear Mr. Hankinson:

This is an official submittal of a request for incorporation into the nonregulatory portion of the State Implementation Plan of revisions to the Kingsport Additional Control Area – Revised Operating Permits for Willamette Industries, Inc.

This submittal represents supplemental information to the revision submitted on April 9, 1997. This current submittal serves to address comments made by the Environmental Protection Agency in letters dated March 26, 1998 and July 14, 1999. Pursuant to 40 CFR 51.103 enclosed are five copies of the supporting documentation consisting of the following:

Nonregulatory Portion of the State Implementation Plan for the Kingsport Additional Control Area – Amended Operating Permits for Willamette Industries and Supporting Documentation

The Environmental Protection Agency is requested to process the enclosed material as a part of the federally approved State Implementation Plan.

If you further information or documentation concerning this matter, please contact either Mr. Malcolm Butler at (615) 532-0600 or Mr. Jeryl Stewart at (615) 532-0605.

Sincerely,

Tracy R. Carter
Technical Secretary
Tennessee Air Pollution Control Board

Attachments - 5

cc: EPA File
Ms. Linda Anderson-Carnahan CERTIFIED Z 334 996 791

Part 5-2.
TN-192

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
BUREAU OF ENVIRONMENT
DIVISION OF AIR POLLUTION CONTROL

IN THE MATTER OF:)
)
)
Adoption of the)
Nonregulatory Portion)
of the State Implementation)
Plan)
)
Revision of the State)
Implementation Plan for)
The Kingsport Additional)
Control Area – Amended)
Operating Permits for)
Willamette Industries, Inc.)

Order Number : 99-028

BOARD ORDER

The following matter came before the Tennessee Air Pollution Control Board on September 15, 1999.

On February 12, 1997 the Tennessee Air Pollution Control Board adopted the operating permits for the Soda Recovery Furnace and the Smelt Tank located at the Willamette Industries Inc. facility located in Kingsport, Tennessee as a part of the State Implementation Plan (SIP) for the Kingsport Additional Control Area. These permits specified particulate emission limits for the two sources. On June 25, 1996 Willamette Industries requested a Certificate of Alternate Control, as per Chapter 1200-3-21 of the Tennessee Air Pollution Control Regulations, for the two sources. The Willamette Industries request was for the particulate emission limit for the Smelt Tank to be raised from 1.3 pounds per hour to 3.0 pounds per hour. To offset these increased emissions Willamette Industries proposed to reduce the particulate emissions from the Soda Recovery Furnace from 44.1 pounds per hour to 35.0 pounds per hour. The company conducted atmospheric dispersion modeling to show that there would be a positive impact to ambient air quality from the revised emission limits. These revised emission limits were incorporated into the operating permits for the Soda Recovery Furnace (Permit #046065P) and the Smelt Tank (Permit #046066P) which were adopted on February 12, 1997.

The United States Environmental Protection Agency (EPA) reviewed the proposed SIP amendment prior to the formal comment period. In a letter dated December 16, 1996 EPA commented that methodology for the verification of compliance with the revised particulate emissions limits for the two sources would be required. In response to that request, copies of particulate emissions tests showing compliance with the revised particulate emission limits for the two sources were included as a part of the final SIP submittal. In a letter dated March 26, 1998. EPA commented that additional compliance verification procedures would have to be incorporated into the permits for the two sources in order for the SIP amendment to be approveable. In response to the EPA comments the operating permits for the Soda Recovery Furnace (Permit #046065P) and the Smelt Tank (Permit #046066P) are hereby amended in conformance with the EPA comments:

PERMIT AMENDMENT FOR WILLAMETTE INDUSTRIES SODA RECOVERY FURNACE

Emission Source Reference Number - 82-0022-02

Permit Number 046065P

Date Issued - February 12, 1997

Date Amended – September 15, 1999

Date Expires - November 1, 2000

AMENDED CONDITIONS

2. Particulate matter emitted from this source shall not exceed 35.0 pounds per hour. This limit is based on the certificate of alternate control, subject to provisions in Chapter 1200-3-21 (General Alternate Emission Standard) of the Tennessee Air Pollution Control Regulations.

Compliance Method: Compliance with this requirement shall be assured by monitoring and recording the power usage of each of the transformer rectifier sets that comprise this electrostatic precipitator at least once per shift when the furnace is operating. In order to demonstrate compliance both of the following conditions must be met:

a. The six transformer rectifier sets that comprise this electrostatic precipitator are constructed so that they form two banks of three T/R' s each. A minimum of four T/R's must be operational with at least two of the three T/R's in each bank operating.

b. The total power input into the operational T/R's sets must exceed 100 kilowatts (KW)

This permit condition will be incorporated into the Title V permit to be issued for the source.

The source does have the right to redefine the minimum total power input into the operational T/R sets by conducting additional particulate source emissions testing that would establish a new minimum total power input. The Technical Secretary must be notified of such testing prior to its being conducted. The Technical Secretary may utilize the results of this new testing in the setting of a new minimum power input rate. Prior to the issuance of a Title V permit the new value shall be incorporated as a SIP amendment. After the Title V permit is issued the new value can be incorporated as a minor permit modification to the Title V permit.

7. Visible emissions from this source shall not exceed 35 percent opacity pursuant to Division Rule 1200-3-5-.09. Reduction of visible emissions data shall be accomplished utilizing EPA Method 9 as published in 40 CFR 60 Appendix A. *(Note, Division Rule 1200-3-5-.09 was not state effective on February 12, 1997. The rule is now state effective and this condition reflects that rule.)* . This permit condition will be incorporated into the Title V permit to be issued for the source.

PERMIT AMENDMENT FOR WILLAMETTE INDUSTRIES SMELT TANK

Emission Source Reference Number - 82-0022-24

Permit Number 046066P

Date Issued - February 12, 1997

Date Amended – September 15, 1999

Date Expires - November 1, 2000

AMENDED CONDITION

2. Particulate matter emitted from this source shall not exceed 3.0 pounds per hour. This limit is based on their certificate of alternate control, subject to provisions in Chapter 1200-3-21 (General Alternate Emission Standard) of the Tennessee Air Pollution Control Regulations.

Compliance Method: This source operates with no particulate emission controls. Particulate emissions are proportional to the black liquor solids feed rate to the companion soda recovery furnace. The daily average pounds of black liquor solids burned in the companion soda recovery furnace shall be recorded. A black liquor solids burn rate equivalent to the particulate emission limit is calculated from the following formula:

$$\frac{\text{emission rate during source test (lb/hr)}}{\text{black liquor solids burn rate during source test (million lb/da)}} = \frac{\text{3.0 lb/hr (allowable particulate emission rate)}}{\text{black liquor solids burn rate equivalent to allowable particulate emission rate}}$$

Currently compliance is based on source emissions testing conducted on July 11, 1995. Here an emission rate of 2.3 pounds per hour was measured at a daily black liquor solids burn rate of 0.99 million lb/da.
Based on information contained in this test report, a maximum daily average black liquor solids burn rate of 1.3 million pounds is equivalent to the applicable mass emission standard. Therefore, a black liquor solids burn rate of less than 1.3 million lb/da shall be deemed as demonstrating compliance.

This permit condition will be incorporated into the Title V permit to be issued for the source.

The source does have the right to redefine the maximum black liquor solids burn rate by conducting additional particulate source emissions testing that would establish a new emission rate at a specific black liquor solids burning rate. These values would be entered into the above listed equation to calculate a new daily average maximum black liquor solids firing rate. The Technical Secretary must be notified of such testing prior to its being conducted. The Technical Secretary may utilize the results of this new testing in the calculation of a new maximum black liquor-firing rate. Prior to the issuance of a Title V permit the new value shall be incorporated as a SIP amendment. After the Title V permit is issued the new value can be incorporated as a minor permit modification to the Title V permit.

Entered and approved by the following members of the Air Pollution Control Board of the State of Tennessee on this 15th day of September, 1999.

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
BUREAU OF ENVIRONMENT
DIVISION OF AIR POLLUTION CONTROL

IN THE MATTER OF:

Adoption of the Nonregulatory Portion of the State Implementation Plan

Revision of the State Implementation Plan for the Kingsport Additional Control Area - Revised Operating Permits for Willamette Industries

ORDER NO. 97-57

BOARD ORDER

The following matter came before the Tennessee Air Pollution Control Board on February 12, 1997.

On May 15, 1980 the Tennessee Air Pollution Control Board adopted the operating permits for the Soda Recovery Furnace and the Smelt Tank located at the Mead Paper Company (now Willamette Industries, Inc.) as a part of the State Implementation Plan (S.I.P.) for the Kingsport Particulate Nonattainment Area (now the Kingsport Additional Control Area). These permits specified particulate emission limits for the two sources. On June 25, 1996 Willamette Industries requested a Certificate of Alternate Control, as per Chapter 1200-3-21 of the Tennessee Air Pollution Control Regulations, for the two sources. The Willamette request was for the particulate emission limit for the Smelt Tank to be raised from the current 1.3 pounds per hour to 3.0 pounds per hour. To offset these increased emissions Willamette Industries proposed to reduce the emissions from the Soda Recovery Furnace from 44.1 pounds per hour to 35.0 pounds per hour. The company conducted atmospheric dispersion modeling to show that there would be a positive impact to ambient air quality from the revised emission limits. A legal notice was made of this proposed S.I.P. Amendment. On December 17, 1996 a Public Hearing was held in Kingsport to receive comments on this proposed revision to the S.I.P. No comments were received.

Tennessee Air Pollution Control Board hereby adopts Operating Permits #046065P (Soda Recovery Furnace) and #046066P (Smelt Tank) into the State Implementation Plan for the Kingsport Additional Control Area in place of the previous permits (#010740P and #010750P respectively) for the two sources. These two permits are attached to this order and are incorporated by reference.

Board Order: 97-57
Nonregulatory Portion
of the State
Implementation Plan
for the Kingsport
Additional Control Area
- Revised Operating
Permits for Willamette
Industries

Entered and approved by the following members of the Air Pollution Control Board of the State of Tennessee, and entered on this 12th day of February, 1997.

William D. Ragsdale

John Sewell

John R. Maccini

J. D. Hays

James W. Haynes

Robert C. Burns

Rudi M Head

Richard A. Bolton

Charles W. Brown

Albert F. Taylor

Raylan A. Adams

CERTIFICATE OF ALTERNATE CONTROL

Pursuant to Chapter 1200-3-21 of the Tennessee Air Pollution Control Regulations this Certificate of Alternate Control is issued to:

Willamette Industries, Inc.
100 Clinchfield Street
Kingsport, Tennessee 37660

for particulate emissions from the following sources:

Soda Recovery Furnace
Smelt Tank

This Certificate of Alternate Control provides that in lieu of meeting the RACT particulate emission standard of 1.3 pounds per hour for the Smelt Tank as stated in the nonregulatory portion of the State Implementation Plan for the Kingsport Nonattainment Area (now the Kingsport Additional Control Area), the particulate emissions from the Smelt Tank shall not exceed 3.0 pounds per hour. To offset these increased emissions the emissions from the Soda Recovery Furnace shall be reduced from 44.1 pounds per hour to 35.0 pounds per hour.

The owner or operator is hereby placed on notice that the Certificate shall become void should the Board find it proper to amend the regulations covering any source listed on the Certificate if the effect is to reduce the allowable emission of the source. The Certificate, in this instance, shall be deemed void ninety (90) days after the receipt of notice from the Technical Secretary of the effective date of the revised regulations.

This Certificate is subject to revocation in accordance with 1200-3-21-.01 (6).

John W. Walton
Technical Secretary
Tennessee Air Pollution Control Board

February 12, 1997
Date

TENNESSEE AIR POLLUTION CONTI RD
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-1531

ERATING PERMIT Issued Pursuant to Tennessee Air Quality Act

Date Issued: **February 12, 1997**

Permit Number: 046065P

Date Expires: November 1, 1999

Issued To:
Willamette Industries, Inc.

Installation Address:
West Main Street
Kingsport

Installation Description:
Soda Recovery Furnace

Emission Source Reference No.
82-0022-02

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.

GENERAL CONDITION:

his permit does not cover any air contaminant source that does not conform to the conditions of this permit and the information given in the approved agreement letter dated June 25, 1996 signed by Keith W. Wahoske. If this person terminates his employment or is reassigned different duties such that he 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.

(continued on the next page)

John H. Walton

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

Particulate matter emitted from this source shall not exceed 35.0 pounds per hour. This limit is based on their certificate of alternate control, subject to provisions in Chapter 1200-3-21 (General Alternate Emission Standard) of the Tennessee Air Pollution Control Regulations.

3. No person shall cause, suffer, allow or permit discharge of a visible emission from any fugitive dust source with an opacity in excess of ten (10) percent for an aggregate of fifteen (15) minutes. Readings are to be taken across the narrower direction if the generation site is rectangular or oblong and are to be perpendicular to the wind direction (±30°). Readings will be taken approximately every 15 seconds for any consecutive fifteen minute period and an arithmetic average used to determine compliance. Any other items not covered here will be in accordance with the general specifications of reference method as specified in part 1200-3-16-.01(5)(g)9.

4. No person shall cause, suffer, allow or permit discharge of a visible emission from the disposal of any material collected by any air pollution control system with an opacity in excess of ten (10) percent for an averaging time of any fifteen (15) continuous minutes. Any other items not covered here will be in accordance with the general specifications of the reference method as specified in part 1200-3-16-.01(5)(g)9.

5. 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 1200-3-9-.02(3).

6. This permit supersedes any previous operating permits.

(END OF CONDITIONS)

CURRENT EMISSIONS REQUIREMENTS AND EMISSION SUMMARY

ISSION SOURCE REFERENCE NUMBER: 82 - 0022 - 02 NONATTAINMENT: _____ ATTAINMENT: x 2. LOG # 046065P

Willamtte Industries, Inc.

RMIT STATUS: 3B. PREVIOUS PERMIT NUMBER:

NEW _____ RENEWAL x RELOCATION _____ CONSTRUCTION: _____ OPERATING: _____

ENTIFY IF ONLY A OF THE SOURCE IS CT TO THIS REMENT	5. POLLUTANT	6. APPLICABLE REQUIREMENT(S): TN AIR POLLUTION CONTROL REGULATIONS, 40 CFR, PERMIT RESTRICTIONS, AIR QUALITY BASED STANDARDS	7. LIMITATION	8. MAXIMUM ACTUAL EMISSIONS			9. MAXIMUM ALLOWABLE EMISSIONS	
				IN UNITS OF ITEM 7	POUNDS / HOUR	TONS / YEAR	POUNDS / HOUR	TONS / YEAR
	TSP	1200-3-21	35.0 lbs./hr.		35.0	153.3	35.0	153.3
	OPACITY	1200-3-5-.01	35% EPA Method 9	SOURCE OF DATA FOR EMISSIONS IN ITEM 8: Certificate of Alternate Control				

IS IS NOT A TITLE V SOURCE, IS THIS A DEFERRED SOURCE (SUBJECT TO NSPS OR NESHAPS) OR A SYNTHETIC MINOR SOURCE? No

ANSWER IS YES, EXPLAIN:

EER: VOM DATE: 02/12/97 SUPERVISOR: _____ DATE: _____

DEPARTMENT OF ENVIRONMENT AN[illegible] [illegible]ERVATION
NASHVILLE, TENNESSEE 37243-1531

[illegible]ERATING PERMIT Issued Pursuant to Tennessee Air Quality Act

Date Issued: **February 12, 1997**

Permit Number: 046066P

Date Expires: November 1, 1999

Issued To:
Willamette Industries, Inc.

Installation Address:
West Main Street
Kingsport

Installation Description:
Smelt Tank

Emission Source Reference No.
82-0022-24

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.

GENERAL CONDITION:

This permit does not cover any air contaminant source that does not conform to the conditions of this permit and the information given in the approved agreement letter dated June 25, 1996 signed by Keith W. Wahoske. If this person terminates his employment or is reassigned different duties such that he 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.

(continued on the next page)

John H. Nelson
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

Particulate matter emitted from this source shall not exceed 3.0 pounds per hour. This limit is based on their certificate of alternate control, subject to provisions in Chapter 1200-3-21 (General Alternate Emission Standard) of the Tennessee Air Pollution Control Regulations.

3. No person shall cause, suffer, allow or permit discharge of a visible emission from any fugitive dust source with an opacity in excess of ten (10) percent for an aggregate of fifteen (15) minutes. Readings are to be taken across the narrower direction if the generation site is rectangular or oblong and are to be perpendicular to the wind direction (±30°). Readings will be taken approximately every 15 seconds for any consecutive fifteen minute period and an arithmetic average used to determine compliance. Any other items not covered here will be in accordance with the general specifications of reference method as specified in part 1200-3-16-.01(5)(g)9.

4. 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 1200-3-9-.02(3).

5. This permit supersedes any previous operating permits.

(END OF CONDITIONS)

CURRENT EMISSIONS REQUIREMENTS AND EMISSION SUMMARY

ISSION SOURCE REFERENCE NUMBER: 82 - 0022 - 24 NONATTAINMENT: _____ ATTAINMENT: x 2. LOG # 046066P

Willamtte Industries, Inc.

RMIT STATUS: 3B. PREVIOUS PERMIT NUMBER:

NEW _____ RENEWAL x RELOCATION _____ CONSTRUCTION: _____ OPERATING: _____

ENTIFY IF ONLY A OF THE SOURCE IS CT TO THIS REMENT	5. POLLUTANT	6. APPLICABLE REQUIREMENT(S): TN AIR POLLUTION CONTROL REGULATIONS, 40 CFR, PERMIT RESTRICTIONS, AIR QUALITY BASED STANDARDS	7. LIMITATION	8. MAXIMUM ACTUAL EMISSIONS			9. MAXIMUM ALLOWABLE EMISSIONS	
				IN UNITS OF ITEM 7	POUNDS / HOUR	TONS / YEAR	POUNDS / HOUR	TONS / YEAR
	TSP	1200-3-21	3.0 lbs./hr.		3.0	13.14	3.0	13.14
	OPACITY	1200-3-16-.01(5)(g)9	10%	SOURCE OF DATA FOR EMISSIONS IN ITEM 8: Certificate of Alternate Control				

IS NOT A TITLE V SOURCE, IS THIS A DEFERRED SOURCE (SUBJECT TO NSPS OR NESHAPS) OR A SYNTHETIC MINOR SOURCE? No

ANSWER IS YES, EXPLAIN:

NEER: VOM DATE: 02/12/97 SUPERVISOR: _____ DATE: _____

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
CUSTOMS HOUSE
701 BROADWAY
NASHVILLE, TENNESSEE 37219-5403

DEC 30 '86

Ms. Rosalyn Hughes
U.S. E.P.A.
345 Courtland St.
Atlanta, GA 30365

Dear Ms. Hughes:

Enclosed are non-regulatory revisions to the State Implementation Plan which were adopted by the Tennessee Air Pollution Control Board on November 19, 1986. Included in this official submittal is the required technical support information for each Board Order. These non-regulatory revisions were adopted following a public hearing for the required revisions which was conducted on November 3, 1986. The non-regulatory revisions to the State Implementation Plan consisted of the following Board Orders:

Board Order #	Description	Request	Effective Date
32-86	Murray Ohio-Variance Request for Bicycle Coating	Variance Request	11/20/86
33-86	Murray-Ohio Variance Request for Lawnmower Coating	Variance Request	11/20/86
34-86	Union Carbide Variance Request for Opacity Control	Variance Request	11/20/86
36-86	Tennessee Eastman Company	Deletion of Operating Permit from SIP	11/20/86

If I may be of further assistance to you, please contact myself or Barry Stephens of my staff.

Sincerely,

Harold E. Hodges

Harold E. Hodges, P.E.
Technical Secretary
Tennessee Air Pollution Control Board

HEH/cw APC D-6

DIVISION OF AIR POLLUTION CONTROL

IN THE MATTER OF: DELETION OF OPERATING PERMIT FOR THE TENNESSEE EASTMAN COMPANY FROM THE STATE IMPLEMENTATION PLAN	)	ORDER NO. 36-86

BOARD ORDER

The following matter came before the Tennessee Air Pollution Control Board on November 19, 1986.

A public hearing was held on November 3, 1986 in Nashville, Tennessee. The hearing was held to consider the deletion of a certain State Implementation Plan (SIP) permit for the Tennessee Eastman Company in Kingsport, Tennessee. The SIP permit is being replaced by a construction permits due to source modifications. The following permit unit is affected:

Source	SIP Permit Number
B-226P-1 Polyester Polymer Production Points 1A-H, 1J-P, 2A-B, 3A, 4A-R, 5A-D, 6A-F, 6H, 7A-B, 7F-G, 8A, and 9A 26,500 lbs/hr. PWR	011397P

Upon recommendation of the Technical Secretary of the Board, the operating permits for the Tennessee Eastman Company, shall be deleted from the State Implementation Plan as proposed.

Approved by the following Board members on November 19, 1986:

Charles W. Brown

Richard A. Bolton

Barbara Sonnenburg

Robert G. Burns

J C Edwards (abstain)

J R Shelley

Ray H. Hansen

Tony A. Duncan

Wayne E. Cantrell

ah/APC-VAR

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
CUSTOMS HOUSE
701 BROADWAY
NASHVILLE, TENNESSEE 37219-5403

DEC 30 '86

Ms. Rosalyn Hughes
U.S. E.P.A.
345 Courtland St.
Atlanta, GA 30365

Dear Ms. Hughes:

Enclosed are non-regulatory revisions to the State Implementation Plan which were adopted by the Tennessee Air Pollution Control Board on November 19, 1986. Included in this official submittal is the required technical support information for each Board Order. These non-regulatory revisions were adopted following a public hearing for the required revisions which was conducted on November 3, 1986. The non-regulatory revisions to the State Implementation Plan consisted of the following Board Orders:

Board Order #	Description	Request	Effective Date
32-86	Murray Ohio-Variance Request for Bicycle Coating	Variance Request	11/20/86
33-86	Murray-Ohio Variance Request for Lawnmower Coating	Variance Request	11/20/86
34-86	Union Carbide Variance Request for Opacity Control	Variance Request	11/20/86
36-86	Tennessee Eastman Company	Deletion of Operating Permit from SIP	11/20/86

If I may be of further assistance to you, please contact myself or Barry Stephens of my staff.

Sincerely,

Harold E. Hodges

Harold E. Hodges, P.E.
Technical Secretary
Tennessee Air Pollution Control Board

HEH/cw APC D-6

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF ENVIRONMENT
DIVISION OF AIR POLLUTION CONTROL

IN THE MATTER OF:)
)
)
UNION CARBIDE CORPORATION) ORDER NO. 34-86
)
)
VARIANCE REQUEST FOR)
OPACITY CONTROL)

BOARD ORDER

On September 30, 1986, the Union Carbide Corporation filed a petition in the office of the Technical Secretary. The petition requested a variance from Division Rule 1200-3-5-.01(1) for the No. 6 carbon brick press at Union Carbide's Lawrenceburg, Tennessee facility. The Technical Secretary has investigated the petition in accordance with his charge at Section 68-25-118 of the Tennessee Air Quality Act and recommends that the Board grant the variance subject to the following stipulations:

1. This variance will begin on November 20, 1986 and end on November 19, 1987.

2. The Board reserves the right to rescind this variance if it is discovered that the total suspended particulate ambient air quality standards are not being met in the vicinity of Union Carbide's Lawrenceburg, Tennessee facility.

In consideration of the Technical Secretary's recommendation, the Board grants Union Carbide Corporation's variance request subject to the two stipulations mentioned above.

Entered and approved by the following Board members on this, the 19th day of November, 1986.

Charles W. Brown

Barbara Sonnenburg

Robert C. Burns

J. Edwards

J. M. Shelley

[signature]

[signature]

Wayne E. Cantrell

QS/ah/APC-VAR

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
CUSTOMS HOUSE
701 BROADWAY
NASHVILLE, TENNESSEE 37219-5403

DEC 30 '86

Ms. Rosalyn Hughes
U.S. E.P.A.
345 Courtland St.
Atlanta, GA 30365

Dear Ms. Hughes:

Enclosed are non-regulatory revisions to the State Implementation Plan which were adopted by the Tennessee Air Pollution Control Board on November 19, 1986. Included in this official submittal is the required technical support information for each Board Order. These non-regulatory revisions were adopted following a public hearing for the required revisions which was conducted on November 3, 1986. The non-regulatory revisions to the State Implementation Plan consisted of the following Board Orders:

Board Order #	Description	Request	Effective Date
32-86	Murray Ohio-Variance Request for Bicycle Coating	Variance Request	11/20/86
33-86	Murray-Ohio Variance Request for Lawnmower Coating	Variance Request	11/20/86
34-86	Union Carbide Variance Request for Opacity Control	Variance Request	11/20/86
36-86	Tennessee Eastman Company	Deletion of Operating Permit from SIP	11/20/86

If I may be of further assistance to you, please contact myself or Barry Stephens of my staff.

Sincerely,

Harold E. Hodges

Harold E. Hodges, P.E.
Technical Secretary
Tennessee Air Pollution Control Board

HEH/cw APC D-6

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF ENVIRONMENT
DIVISION OF AIR POLLUTION CONTROL

IN THE MATTER OF:

MURRAY OHIO MANUFACTURING COMPANY
LAWRENCEBURG

ORDER NO. 32 86

VARIANCE FOR COATING BICYCLES

BOARD ORDER

The following matter came before the Tennessee Air Pollution Control Board on November 19, 1986.

The Murray Ohio Manufacturing Company has requested a variance from the Tennessee Air Pollution Control Regulations as pertains to coating bicycles. Rule 1200-3-18-.21 was adopted on December 31, 1980. This rule specifies volatile organic compound emission standards which Murray does not satisfy while coating bicycles. A revision to rule 1200-3-18-.21 exempting bicycle coating from this rule is proposed.

The Air Pollution Control Board does hereby grant a variance from rule 1200-3-18-.21 to the Murray Ohio Manufacturing Company for its bicycle coating operations. This variance is valid until November 18, 1987.

Approved by the following Board Members on November 19, 1986:

Charles W. Brown

C. H. Hansen

Richard A. Bolton

Tony A. Duncan

Barbara Sonnenburg

Wayne E. Kimbrell

Robert C. Burns

J. C. Edwards

J. R. Shelton

ah/APC-VAR

APPENDIX A
SOURCE SPECIFIC REVISIONS

Part 6

Deletion of Operating Permits for Tennessee Eastman Company and General Smelting and Refining Company.
Submittal Date: January 6, 1988
Federal Register: 53 FR 39742

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
CUSTOMS HOUSE
701 BROADWAY
NASHVILLE, TENNESSEE 37219-5403

JAN 06 1988

Mr. Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

Dear Mr. Miller:

Enclosed is the official submittal of regulatory and non-regulatory revisions of the State Implementation Plan. Included in this official submittal is the required technical support information for each item. These revisions were adopted following a public hearing. The revisions approved by the Tennessee Air Pollution Control Board and officially submitted include the following items:

Item	Description	Request
Board Order 06-87	Milan Army Ammunition Variance Alternate Method of Determining Allowable Particulate Emission Standard	Variance from Division Rule 1200-3-3-.03
Board Order 07-87	William L. Bonnell Co. Variance Request for Use of Special Coating	Variance from Division Rule 1200-3-18-.21 until September 16, 1988
Board Order 08-87	State Industries, Inc. Variance Request for Certificate of Alternate Control Averaging times	Variance from Division Rule 1200-3-18-.04(8) until August 12, 1988
Board Order 09-87	E. I. Dupont Denemours & Co. Variance request from Sulfur Dioxide Ambient Air monitoring Requirements	Variance from Division Rule 1200-3-3-.03 until June 2, 1988
Board Order 10-87	Proposed Amendment to the Metropolitan-Davidson County Portion of the SIP Regulation No. 3--New Source Review, Modeling Guidelines	Amendment to Section 3-3, Prevention of Significant Deterioration (PSD) Review

Board Order 22-87	Union Carbide Corporation Variance Request for Opacity Control	Variance request from Division Rule 1200-3-5-.01(1) for the No. 6 Carbon Brick Press
Board Order 23-87	Hassell and Hughes Lumber Co. Variance Request for Opacity Control	Variance request from Division Rule 1200-3-5-.01(1)
Board Order 24-87	Amendment to Section 2.15 of the State Implementation Plan	Incorporate revised emission standards for total reduced sulfur for Kraft Pulp Mills
Board Order 25-87	Amendment to Section 2.9.12 of the State Implementation Plan	Incorporate revised test methods for chlorine and chlorine compounds
Board Order 26-87	Murray Ohio Certificate of Alternate Control	Variance from Division Rule 1200-3-18-.21 TAPC Regulations
Board Order 27-87	Murray Ohio Certificate of Alternate Control Averaging Times	Variance from Division Rule 1200-3-18-.04 (8) TAPC Regulations
Board Order 28-87	Jehl Cooperage Certificate of Alternate Control	Variance request Division Rule 1200-3-18-.21 TAPC Regulations
Board Order 29-87	Jehl Cooperage Certificate of Alternate Control Averaging Times	Variance from Division Rule 1200-3-18-.4(8) TAPC Regulations
Board Order 30-87	Greif Brothers Corporation Operating Permit	Incorporate Greif Brothers Operating Permit into the State Implementation Plan
Board Order 31-87	Occidental Chemical Corporation Variance Request	Variance from Division Rule 1200-3-5-.01 and .02 TAPC Regulations for Phosphorus Oxide Emissions
Board Order 32-87	Stauffer Chemical Company Variance Request	Variance from Division Rule 1200-3-5-.01 and .02 TAPC Regulations for Phosphorus Oxide Emissions.
Board Order 33-87	Monsanto Company Variance Request	Variance from Division Rule 1200-3-5-.01 and .02 TAPC Regulations for Phosphorus Oxide Emissions

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF ENVIRONMENT
DIVISION OF AIR POLLUTION CONTROL

IN THE MATTER OF: DELETION OF OPERATING PERMITS FOR THE TENNESSEE EASTMAN COMPANY FROM THE STATE IMPLEMENTATION PLAN	)	ORDER NO. 13-87

BOARD ORDER

The following matter came before the Tennessee Air Pollution Control Board on August 13, 1987.

A public hearing was held on May 21, 1987 in Nashville, Tennessee. The hearing was held to consider the deletion of certain State Implementation Plan (SIP) permits for the Tennessee Eastman Company in Kingsport, Tennessee. The SIP permits are being replaced by construction permits due to source modifications. The following permit units are affected:

Source	SIP Permit Number
Hydroquinone Production	008760P
Plastic Pellets Small Order Extrusion	008817P
Plastics Testing	008782P
Small Order Banbury and Rolling Opn.	008759P
Flyash and Bottom Ash Silos	010088P

Upon recommendation of the Technical Secretary of the Board, the operating permits for the Tennessee Eastman Company, shall be deleted from the State Implementation Plan as proposed.

Approved by the following Board members on August 13, 1987:

Albert F. Taylor — H. M. Sigler
Barbara Sonnenburg — Ruth N. Neff
Wayne C. Gentry
W. M. Barrett
Richard A. Bolton

SUBJECT: TENNESSEE EASTMAN SIP PERMIT 008760P (82-1003-10,11)

TENNESSEE EASTMAN IS PROPOSING THE FOLLOWING CHANGES TO THIS SOURCE: 1) VENTS A through D WILL BE EUMINATED

2) A SCRUBBER WILL BE ADDED TO VENT E.

3) INCREASE OPERATING HOURS FROM 8400/yr to 8760/yr.

4) DECREASE PROCESS WEIGHT RATE FROM 48,600 lb/hr to 3800 lb/hr.

5) DECREASE PARTICULATE EMISSIONS.

PERMIT: 008760P

	LB/HR	TONS/YEAR
AVG.	0.436	1.8
MAX.	0.85	3.6
POTENTIAL	0.85	3.6

PERMIT: 995902P

	LB/HR	TONS/YEAR
AVG.	0.05	0.22
MAX.	0.24	1.05
POTENTIAL	0.24	1.05

Tennessee Eastman SIP Permit Deletion
Permit # 008782P (82-01003-76)

The proposed change will not adversely affect air quality, and will leave room for growth.

NESSEE AIR POLLUTION CONTROL BOARD
NASHVILLE, TENNESSEE 37219

ing Permit issued pursuant to Tennessee Air Quality Act

e Issued: December 11, 1980 Permit Number: 008782P

res:

ed to: Installation Address:

Tennessee Eastman Company Kingsport

---

allation Description: Emission Source Reference No.:
B-65E-1 82-01003-76
Plastics testing EMS #076
pressing, rollings, banburying
25 lbs/hr PWR

---

e holder of this permit shall comply with the conditions contained in this permit as well as all plicable provisions of the Tennessee Air Pollution Control Regulations.

ONDITIONS:

1. The particulate matter discharged from this source shall not exceed 0.5 lbs/hr.

2. This source shall not be operated in excess of 2392 hours per year and 16 hours per day.

3. The owner or operator of this source with restricted operating hours must maintain a daily log of operating hours and keep it available for inspection by Division personnel on request for at least one year after the end of any calendar year included in the log. The owner or operator shall submit by letter on or before January 31 of each year the total hours of operation for the previous calendar year and the maximum daily operation for said calendar year.

HAROLD E. HODGES, P. E.
TECHNICAL SECRETARY jdp

io a prity is granted by this permit to operate, construct, or maintain any installation in violation any law, statute, code, ordinance, rule or regulation of the State of Tennessee or any of its political ibdivisions.

NON TRANSFERABLE

POST OR FILE AT INSTALLATION ADDRESS

PH-0423
APC Rev. 1/73

COMPANY: Tennessee Eastman Company

Source: 82-1003-03

EXISTING OPERATING PERMIT: 008759 P

Tennessee Eastman proposes the following changes:

1. Operating hours will change from 2,392 HR/YR to 4,160 HR/YR.
2. The process weight rate will change from 750 LB/HR to 1650 LB/HR

	TSP		VOC	
	Lb/Hr	Tons/Yr	Lb/Hr	Tons/Yr
ACTUAL	1.5	1.79	Neg.	Neg.
ALLOWABLE	1.5	1.79	Neg.	Neg.
POTENTIAL	1.5	1.79	Neg.	Neg.

OPERATING PERMIT: 008759 P

	TSP		VOC	
	Lb/Hr	Tons/Yr	Lb/Hr	Tons/Yr
ACTUAL	0.75	1.56	1.06	2.20
ALLOWABLE	1.50	3.12	2.10	4.39
POTENTIAL	1.50	3.12	2.10	4.39

CONSTRUCTION PERMIT:

TSP INCREASE - 1.33

VOC INCREASE - 4.39

Tennessee Eastman SIP Permit Deletion
Permit # 010088P (82-00003-74)

The proposed change is not expected to adversely affect air quality, and should not prevent growth since there is a projected decrease in emissions.

TENNESSEE AIR POLLUTION CONTROL BOARD
NASHVILLE, TENNESSEE 37219

Operating Permit issued pursuant to Tennessee Air Quality Act

Date Issued: JAN 1 3 1983

Permit Number: 010088P

Expires:

Issued to:
Tennessee Eastman Company

Installation Address:
Kingsport

Installation Description:
B-253-3 Flyash and Bottom ash Silos
Points A, B, C, D, E, F, G, H, I, J
With Wet Scrubber & Cyclone
124,600 lbs/hr PWR

Emission Source Reference No.:
32-00003-74

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 particulate matter discharged from this source shall not exceed 3.0 lbs/hr.

2. This source shall not be operated in excess of 4368 hours per year.

3. The owner or operator of this source with restricted operating hours must maintain a daily log of operating hours and keep it available for inspection by Division personnel on request for at least one year after the end of any calendar year included in the log. The owner or operator shall submit by letter on or before January 31 of each year the total hours of operation for the previous calendar year and the maximum daily operation for said calendar year.

HAROLD E. HODGES, P. E.
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 OR FILE AT INSTALLATION ADDRESS

P-178

PH-0423
APC Rev. 1/78
D-40

COMPANY: Tennessee Eastman Company

Source: 82-1006-59 (B-65E-2)

EXISTING OPERATING PERMIT: 008817P

Tennessee Eastman proposes the following changes:

1. Operating hours will change from 2,392 HR/YR to 4,160 HR/YR
2. The process weight rate will change from 300 LB/HR to 776 LB/HR

	TSP		VOC	
	LB/HR	TONS/YR	LB/HR	TONS/YR
ACTUAL	0.1	0.12	Neg	Neg
ALLOWABLE	0.1	0.12	Neg	Neg
POTENTIAL	0.1	0.12	Neg	Neg

OPERATING PERMIT: 008817P

	TSP		VOC	
	LB/HR	TONS/YR	LB/HR	TONS/YR
ACTUAL	0.05	0.10	0.36	0.75
ALLOWABLE	0.10	0.21	0.71	1.48
POTENTIAL	0.10	0.21	0.71	1.48

CONSTRUCTION PERMIT:

TSP INCREASE - 0.07 TONS/YR

VOC INCREASE - 1.48 TONS/YR

Tennessee Eastman SIP Permit Deletion
Permit # 008760P (82-1003-10, 11)

The proposed change will not adversely affect air quality, and will have a benefit in terms of future growth

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF ENVIRONMENT
DIVISION OF AIR POLLUTION CONTROL

IN THE MATTER OF:	)	
	)	
DELETION OF OPERATING PERMITS	)	
FOR GENERAL SMELTING AND	)	ORDER NO. 14-87
REFINING COMPANY FROM THE	)	
STATE IMPLEMENTATION PLAN	)	
	)	
	)	

BOARD ORDER

The following matter came before the Tennessee Air Pollution Control Board on June 3, 1987.

A public hearing was held on May 21, 1987 in Nashville, Tennessee. The hearing was held to consider the deletion of certain State Implementation Plan (SIP) permits for the General Smelting and Refining Company in College Grove, Tennessee. The SIP permits are being replaced by construction permits due to source modifications. The following permit units are affected:

Source	SIP Permit Number
Secondary Lead Smelting Furnaces	011515P

Upon recommendation of the Technical Secretary of the Board, the operating permits for the General Smelting and Refining Company, shall be deleted from the State Implementation Plan as proposed.

Approved by the following Board members on August 13, 1987:

Albert F. Taylor	Robert C. Brown
Barbara Sonnenburg	H M Ziegler
J C Edwards	Rudolph W. Neff
Wayne E. Cantrell	
D. M. Garrett	
Richard A. Bolton	

Public Hearing
5/20/87

Operating permit 011515P for the Secondary Lead Smelting Furnaces at General Smelting and Refining in College Grove is being deleted from the State Implementation Plan (SIP) due to replacement of the existing 2.75 ton per hour reverberatory furnace with a now 1 ton per hour reverberatory furnace. It is being replaced by a construction permit.

It is anticipated that there will be a net reduction in emissions since the capacity of the reverberatory furnace has been reduced. It is pointed out that the installation of the mechanical pneumatic system to remove dust from the baghouse hoppers directly to the new reverberatory furnace will virtually eliminate fugitive dust from the handling of this material. Fugitives from stored baghouse dust have been a major concern in the past. There is now a baghouse dedicated exclusively to the control of the reverberatory furnace, whereas before the reverberatory furnace was ducted to a common control device with the two blast furnaces.

7. This permit supersedes any previous operating permit(s) for this source.

8. The visible emissions from the fabric filter collectors on the smelting furnaces shall not exhibit an opacity greater than 20 percent as specified in Rule 1200-3-5-.01 of the TAPCR.

9. Process related fugitive emissions for the smelting furnaces shall not exhibit an opacity of greater than 5 percent. Opacity determinations shall be made using the current EPA Method 9, "Visual Determination of the Opacity of Emissions from Stationary Sources", Federal Register, Volume 39, No. 219 on November 12, 1974 (i.e. 6 minute average opacity).

10. Visible emissions from the handling and storage of particulate matter containing lead as associated with this process shall not exceed zero (0) percent opacity. Opacity determinations shall be made using the current EPA Method 9, "Visual Determination of the Opacity of Emissions from Stationary Sources", Federal Register, Volume 39, No. 219 on November 12, 1974 (i.e. 6 minute average opacity). The Technical Secretary shall determine if said particulate matter is subject to this standard.

11. This smelting operation shall not operate for more than 1580 hours per calendar quarter. A log book of operating times shall be maintained and made available to the Technical Secretary or his representative upon request.

12. The company will prepare and submit for approval by the Technical Secretary a detailed plan describing the inspection and maintenance practices the company will implement to achieve the objective as follows:

    Regular inspections of smelter process, material handling, and emission control equipment to insure proper operation shall be performed. The inspection shall be performed at least once per shift in each smelter department. The inspector shall document the operating status of each piece of equipment capable of emitting lead or lead compounds into the ambient air.

6. The particulate matter emitted from this source shall not exceed 7.3 pounds per hour.

7. The sulfur dioxide emitted from this source shall not exceed 2000 ppm (386 pounds per hour).

8. The source owner or operator shall provide sampling ports and a suitable platform for the conducting of source emissions testing on the effluent gas stream of the source.

9. Within 60 days after receipt of this permit, the owner or operator shall conduct an emissions performance test for the pollutants listed below. A written report of the results of the performance test shall be submitted to the Technical Secretary within 45 days of the date of the test. The performance test shall be conducted and data reduced in accordance with methods and procedures specified in Chapter 1200-3-12-.03 of the Tennessee Air Pollution Control Regulations.

   Particulates
   Lead

10. At least thirty (30) days prior to conducting the source test, the Technical Secretary shall be given notice of the test in order to afford him the opportunity to have an observer present.

11. An accurate upset condition and maintenance log book shall be maintained in accordance with Rule 1200-3-20-.04 of the Tennessee Air Pollution Control Regulations. Also, the requirements of Rule 1200-3-20-.03 shall be followed if a malfunction occurs. The company will prepare and submit for approval by the Technical Secretary, a detailed plan describing the inspection and maintenance practices the company will implement to achieve the objective as follows:

    Regular inspections of smelter process, material handling, and emission control equipment to insure proper operation shall be performed. The inspection shall be performed at least once per shift in each smelter department. The permittee shall document the operating status of each piece of equipment capable of emitting lead or lead containing materials.

    This plan must be received in the office of the Technical Secretary within sixty (60) days of the issue date of this permit.

12. A pressure drop sensor, of a type acceptable to the Technical Secretary, must be installed on Baghouses #1 and #2 for this source and each sensor must be connected to a continuous strip chart recorder. Said records shall be maintained for a period of not less than 2 years and shall be made available for the Technical Secretary or his representative. The schedule for the implementation of this monitoring requirement shall be that specified by Part 1200-3-10-.02 (1) (d) 1. of the Regulations. Details as to the time frames involved are stated in Condition 13.

13. The source owner or operator must install, maintain, operate, and submit reports of excess emissions from in-stack opacity monitoring systems to be located in representative areas of the effluent gas streams of Baghouses #1 and #2. The in-stack opacity monitors shall meet all the requirements specified in Performance Specification 1, as stated in the Federal Register, Volume 48, Number 62, Wednesday, March 30, 1983, and performance test data shall be submitted as proof of this. Prior to the installation of this in-stack opacity monitoring system, a monitoring plan shall be submitted to the Technical Secretary. Details of this required plan are included as an attachment to this permit and incorporated by reference. The schedule for the implementation of this in-stack monitoring requirement shall be that specified by Part 1200-3-10-.02 (1) (d) 1. of the Regulations. The required monitoring plan shall be submitted within sixty (60) days of the receipt of this permit. The monitoring systems shall be ordered within thirty (30) days of the receipt of the approval of the monitoring plan. Within ninety (90) days of the receipt of the equipment, said equipment shall be in effective operation in accordance with the agreed monitoring plan.

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
CUSTOMS HOUSE
701 BROADWAY
NASHVILLE, TENNESSEE 37219-5403

JAN 06 1988

Mr. Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

Dear Mr. Miller:

Enclosed is the official submittal of regulatory and non-regulatory revisions of the State Implementation Plan. Included in this official submittal is the required technical support information for each item. These revisions were adopted following a public hearing. The revisions approved by the Tennessee Air Pollution Control Board and officially submitted include the following items:

Item	Description	Request
Board Order 06-87	Milan Army Ammunition Variance Alternate Method of Determining Allowable Particulate Emission Standard	Variance from Division Rule 1200-3-3-.03
Board Order 07-87	William L. Bonnell Co. Variance Request for Use of Special Coating	Variance from Division Rule 1200-3-18-.21 until September 16, 1988
Board Order 08-87	State Industries, Inc. Variance Request for Certificate of Alternate Control Averaging times	Variance from Division Rule 1200-3-18-.04(8) until August 12, 1988
Board Order 09-87	E. I. Dupont Denemours & Co. Variance request from Sulfur Dioxide Ambient Air monitoring Requirements	Variance from Division Rule 1200-3-3-.03 until June 2, 1988
Board Order 10-87	Proposed Amendment to the Metropolitan-Davidson County Portion of the SIP Regulation No. 3--New Source Review, Modeling Guidelines	Amendment to Section 3-3, Prevention of Significant Deterioration (PSD) Review

Board Order 22-87	Union Carbide Corporation Variance Request for Opacity Control	Variance request from Division Rule 1200-3-5-.01(1) for the No. 6 Carbon Brick Press
Board Order 23-87	Hassell and Hughes Lumber Co. Variance Request for Opacity Control	Variance request from Division Rule 1200-3-5-.01(1)
Board Order 24-87	Amendment to Section 2.15 of the State Implementation Plan	Incorporate revised emission standards for total reduced sulfur for Kraft Pulp Mills
Board Order 25-87	Amendment to Section 2.9.12 of the State Implementation Plan	Incorporate revised test methods for chlorine and chlorine compounds
Board Order 26-87	Murray Ohio Certificate of Alternate Control	Variance from Division Rule 1200-3-18-.21 TAPC Regulations
Board Order 27-87	Murray Ohio Certificate of Alternate Control Averaging Times	Variance from Division Rule 1200-3-18-.04 (8) TAPC Regulations
Board Order 28-87	Jehl Cooperage Certificate of Alternate Control	Variance request Division Rule 1200-3-18-.21 TAPC Regulations
Board Order 29-87	Jehl Cooperage Certificate of Alternate Control Averaging Times	Variance from Division Rule 1200-3-18-.4(8) TAPC Regulations
Board Order 30-87	Greif Brothers Corporation Operating Permit	Incorporate Greif Brothers Operating Permit into the State Implementation Plan
Board Order 31-87	Occidental Chemical Corporation Variance Request	Variance from Division Rule 1200-3-5-.01 and .02 TAPC Regulations for Phosphorus Oxide Emissions
Board Order 32-87	Stauffer Chemical Company Variance Request	Variance from Division Rule 1200-3-5-.01 and .02 TAPC Regulations for Phosphorus Oxide Emissions.
Board Order 33-87	Monsanto Company Variance Request	Variance from Division Rule 1200-3-5-.01 and .02 TAPC Regulations for Phosphorus Oxide Emissions

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF ENVIRONMENT
DIVISION OF AIR POLLUTION CONTROL

IN THE MATTER OF:

STATE INDUSTRIES, INC.
ASHLAND CITY

ORDER NO. 08-87

VARIANCE FOR CERTIFICATE OF
ALTERNATE CONTROL
AVERAGING TIMES

BOARD ORDER

State Industries, Inc. has requested a variance from the Tennessee Air Pollution Control Regulations as pertains to the averaging time for demonstrating compliance with an alternate emission standard. The purpose of this request is to allow the company to average emissions over a twenty-four-hour period. The provision of paragraph 1200-3-18-.04(8) specifies eight hours as the maximum time over which averaging is to be allowed. A revision to this paragraph establishing twenty-four hours as the maximum time over which averaging is to be allowed has been approved by the Board.

The Board hereby grants a variance from the provision of paragragh 1200-3-18-.04(8) specifying eight hours as the maximum allowable averaging time, subject to the condition that twenty-four-hours shall be the maximum allowable averaging time for demonstrating compliance with an alternate emission standard for volatile organic compound emissions from the State Industries, Inc., plant. This variance is valid until August ~~14~~ 12th, 1988.

AT
BS
JCE
WEC
DWS

RCB
BWK
RAB

Approved by the following Board members on August 13, 1987.

Albert F. Taylor — Robert C. Brown

Barbara Sonnenburg — Ruth N. Neff

J C Edwards

Wayne E. Cantrell

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF ENVIRONMENT
DIVISION OF AIR POLLUTION CONTROL

IN THE MATTER OF:	)
STATE INDUSTRIES, INC. ASHLAND CITY	) ORDER NO. 08-87
VARIANCE FOR CERTIFICATE OF ALTERNATE CONTROL AVERAGING TIMES	)

BOARD ORDER

State Industries, Inc. has requested a variance from the Tennessee Air Pollution Control Regulations as pertains to the averaging time for demonstrating compliance with an alternate emission standard. The purpose of this request is to allow the company to average emissions over a twenty-four-hour period. The provision of paragraph 1200-3-18-.04(8) specifies eight hours as the maximum time over which averaging is to be allowed. A revision to this paragraph establishing twenty-four hours as the maximum time over which averaging is to be allowed has been approved by the Board.

The Board hereby grants a variance from the provision of paragragh 1200-3-18-.04(8) specifying eight hours as the maximum allowable averaging time, subject to the condition that twenty-four-hours shall be the maximum allowable averaging time for demonstrating compliance with an alternate emission standard for volatile organic compound emissions from the State Industries, Inc., plant. This variance is valid until June 4, 1988.

Approved by the following Board members on June 3, 1987.

[signature]	Richard A. Bolton
Charles W. Brown	Barbara Sonnenburg
[signature]	
[signature]	

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
CUSTOMS HOUSE
701 BROADWAY
NASHVILLE, TENNESSEE 37219-5403

JAN 06 1988

Mr. Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

Dear Mr. Miller:

Enclosed is the official submittal of regulatory and non-regulatory revisions of the State Implementation Plan. Included in this official submittal is the required technical support information for each item. These revisions were adopted following a public hearing. The revisions approved by the Tennessee Air Pollution Control Board and officially submitted include the following items:

Item	Description	Request
Board Order 06-87	Milan Army Ammunition Variance Alternate Method of Determining Allowable Particulate Emission Standard	Variance from Division Rule 1200-3-3-.03
Board Order 07-87	William L. Bonnell Co. Variance Request for Use of Special Coating	Variance from Division Rule 1200-3-18-.21 until September 16, 1988
Board Order 08-87	State Industries, Inc. Variance Request for Certificate of Alternate Control Averaging times	Variance from Division Rule 1200-3-18-.04(8) until August 12, 1988
Board Order 09-87	E. I. Dupont Denemours & Co. Variance request from Sulfur Dioxide Ambient Air monitoring Requirements	Variance from Division Rule 1200-3-3-.03 until June 2, 1988
Board Order 10-87	Proposed Amendment to the Metropolitan-Davidson County Portion of the SIP Regulation No. 3--New Source Review, Modeling Guidelines	Amendment to Section 3-3, Prevention of Significant Deterioration (PSD) Review

Board Order 11-87	Harman Automotive, Inc. Variance Request for Certificate of Alternate Control Averaging Times	Variance from Division Rule 1200-3-18-.04(8) until September 16, 1988
Board Order 12-87	Monsanto Company Variance Request for Certificate of Alternate Emission Standards	Variance from Division Rules 1200-3-7-.04(2) and 1200-3-5-.01(1) until May 1, 1988
Board Order 13-87	Tennessee Eastman Company deletion of Operating Permits (SIP Permits)	Deletion of operating permits (SIP Permits) and replacement by Non-SIP construction permits due to source modification
Board Order 14-87	General Smelting and Refining Company deletion of Operating Permits (SIP Permits)	Deletion of operating permits (SIP Permits) and replacement by Non-SIP construction permits due to source modification
Board Order 15-87	Adoption of Nonregulatory Portion of the SIP: 2.8.1.B Prevention of Significant Air Quality Deterioration	Amend to Section 2.8.1.B to update reference to Air Quality Modelling Guidelines
Board Order 16-87	Amendment to Section 1.3 Table 1B to Reclassify New Johnsonville Sulfur Dioxide Secondary Nonattainment Area	Amend to Section 1.3 Table 1B of the SIP for meeting Ambient Air Quality Standards
Board Order 19-87	Dixico Incorporated Memphis, Tennessee Variance for Certificate of Alternate Control Averaging Times	Variance request to allow the company to average emissions over a 24-hour period.
Board Order 20-87	Murray Ohio Manufacturing Company, Lawrenceburg, Tenn. Variance for Coating Bicycles	Variance request from Division Rule 1200-3-18-.21
Board Order 21-87	North American Rayon Corp. Variance Request for Emergency Operation of Uncontrolled Boilers 1 and 2	Variance request from Division Rules 1200-3-6-.02; 1200-3-5-.01; and 1200-3-9-.02 for emergency operation of Boilers 1 and 2

Board Order 22-87	Union Carbide Corporation Variance Request for Opacity Control	Variance request from Division Rule 1200-3-5-.01(1) for the No. 6 Carbon Brick Press
Board Order 23-87	Hassell and Hughes Lumber Co. Variance Request for Opacity Control	Variance request from Division Rule 1200-3-5-.01(1)
Board Order 24-87	Amendment to Section 2.15 of the State Implementation Plan	Incorporate revised emission standards for total reduced sulfur for Kraft Pulp Mills
Board Order 25-87	Amendment to Section 2.9.12 of the State Implementation Plan	Incorporate revised test methods for chlorine and chlorine compounds
Board Order 26-87	Murray Ohio Certificate of Alternate Control	Variance from Division Rule 1200-3-18-.21 TAPC Regulations
Board Order 27-87	Murray Ohio Certificate of Alternate Control Averaging Times	Variance from Division Rule 1200-3-18-.04 (8) TAPC Regulations
Board Order 28-87	Jehl Cooperage Certificate of Alternate Control	Variance request Division Rule 1200-3-18-.21 TAPC Regulations
Board Order 29-87	Jehl Cooperage Certificate of Alternate Control Averaging Times	Variance from Division Rule 1200-3-18-.4(8) TAPC Regulations
Board Order 30-87	Greif Brothers Corporation Operating Permit	Incorporate Greif Brothers Operating Permit into the State Implementation Plan
Board Order 31-87	Occidental Chemical Corporation Variance Request	Variance from Division Rule 1200-3-5-.01 and .02 TAPC Regulations for Phosphorus Oxide Emissions
Board Order 32-87	Stauffer Chemical Company Variance Request	Variance from Division Rule 1200-3-5-.01 and .02 TAPC Regulations for Phosphorus Oxide Emissions.
Board Order 33-87	Monsanto Company Variance Request	Variance from Division Rule 1200-3-5-.01 and .02 TAPC Regulations for Phosphorus Oxide Emissions

Regulation/ Amendment	Description	Request
1200-3-18-.02(m)	Definitions	Delegation of Authority
1200-3-16-.01(6)(e)	Compliance Standards	Delegation of Authority
1200-3-16-.21	NSPS Primary Aluminum Reduction Plants	Delegation of Authority
1200-3-9-.04(1)(c)	Construction and Operating Permits: Exemptions	Delegation of Authority
1200-3-19-.11(3)	Bristol Non-Attainment Area	Delegation of Authority
1200-3-19-.12(2)	Campbell Co. Non-Attainment Area	Delegation of Authority
1200-3-19-.05(4)	Operating Permits and Emission Limiting Conditions	Delegation of Authority
1200-3-6-.05(4)	Non-Process Visible Emission: Wood Fired Fuel Burning	Delegation of Authority
1200-3-24	Good Engineering Practice Stack Height Regulations	Delegation of Authority

If I may be of further assistance to you, please contact myself or Barry Stephens of my staff.

Sincerely,

Harold E. Hodges, P.E.
Technical Secretary
Tennessee Air Pollution Control Board

HEH/dje/APC-dd5

Enclosure

BUREAU OF ENVIRONMENT
DIVISION OF AIR POLLUTION CONTROL

IN THE MATTER OF:	)	
	)	
HARMAN AUTOMOTIVE, INC.	)	
BOLIVAR	)	ORDER NO. 11- 87
	)	
VARIANCE FOR CERTIFICATE OF	)	
ALTERNATE CONTROL	)	
AVERAGING TIMES	)	

BOARD ORDER

Harman Automotive, Inc., has requested a variance from the Tennessee Air Pollution Control Regulations as pertains to the averaging time for demonstrating compliance with an alternate emission standard. The purpose of this request is to allow the company to average emissions over a twenty-four-hour period. A provision of paragraph 1200-3-18-.04(8) specifies eight hours as the maximum time over which averaging is to be allowed. A revision to this paragraph establishing twenty-four hours as the maximum time over which averaging is to be allowed has been approved by the Board but is not yet effective.

The Board hereby grants a variance from the provision of paragraph 1200-3-18-.04(8) specifying eight hours as the maximum allowable averaging time, subject to the condition that twenty-four hours shall be the maximum allowable averaging time for demonstrating compliance with an alternate emission standard for volatile organic compound emissions from the Harman Automotive, Inc., plant. This variance is valid until September 16, 1988.

Approved by the following Board members on August 13, 1987:

Barbara Sonnenburg

Robert C. Burns

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
CUSTOMS HOUSE
701 BROADWAY
NASHVILLE, TENNESSEE 37219-5403

JAN 06 1988

Mr. Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

Dear Mr. Miller:

Enclosed is the official submittal of regulatory and non-regulatory revisions of the State Implementation Plan. Included in this official submittal is the required technical support information for each item. These revisions were adopted following a public hearing. The revisions approved by the Tennessee Air Pollution Control Board and officially submitted include the following items:

Item	Description	Request
Board Order 06-87	Milan Army Ammunition Variance Alternate Method of Determining Allowable Particulate Emission Standard	Variance from Division Rule 1200-3-3-.03
Board Order 07-87	William L. Bonnell Co. Variance Request for Use of Special Coating	Variance from Division Rule 1200-3-18-.21 until September 16, 1988
Board Order 08-87	State Industries, Inc. Variance Request for Certificate of Alternate Control Averaging times	Variance from Division Rule 1200-3-18-.04(8) until August 12, 1988
Board Order 09-87	E. I. Dupont Denemours & Co. Variance request from Sulfur Dioxide Ambient Air monitoring Requirements	Variance from Division Rule 1200-3-3-.03 until June 2, 1988
Board Order 10-87	Proposed Amendment to the Metropolitan-Davidson County Portion of the SIP Regulation No. 3--New Source Review, Modeling Guidelines	Amendment to Section 3-3, Prevention of Significant Deterioration (PSD) Review

Board Order 11-87	Harman Automotive, Inc. Variance Request for Certificate of Alternate Control Averaging Times	Variance from Division Rule 1200-3-18-.04(8) until September 16, 1988
Board Order 12-87	Monsanto Company Variance Request for Certificate of Alternate Emission Standards	Variance from Division Rules 1200-3-7-.04(2) and 1200-3-5-.01(1) until May 1, 1988
Board Order 13-87	Tennessee Eastman Company deletion of Operating Permits (SIP Permits)	Deletion of operating permits (SIP Permits) and replacement by Non-SIP construction permits due to source modification
Board Order 14-87	General Smelting and Refining Company deletion of Operating Permits (SIP Permits)	Deletion of operating permits (SIP Permits) and replacement by Non-SIP construction permits due to source modification
Board Order 15-87	Adoption of Nonregulatory Portion of the SIP: 2.8.1.B Prevention of Significant Air Quality Deterioration	Amend to Section 2.8.1.B to update reference to Air Quality Modelling Guidelines
Board Order 16-87	Amendment to Section 1.3 Table 1B to Reclassify New Johnsonville Sulfur Dioxide Secondary Nonattainment Area	Amend to Section 1.3 Table 1B of the SIP for meeting Ambient Air Quality Standards
Board Order 19-87	Dixico Incorporated Memphis, Tennessee Variance for Certificate of Alternate Control Averaging Times	Variance request to allow the company to average emissions over a 24-hour period.
Board Order 20-87	Murray Ohio Manufacturing Company, Lawrenceburg, Tenn. Variance for Coating Bicycles	Variance request from Division Rule 1200-3-18-.21
Board Order 21-87	North American Rayon Corp. Variance Request for Emergency Operation of Uncontrolled Boilers 1 and 2	Variance request from Division Rules 1200-3-6-.02; 1200-3-5-.01; and 1200-3-9-.02 for emergency operation of Boilers 1 and 2

Board Order 22-87	Union Carbide Corporation Variance Request for Opacity Control	Variance request from Division Rule 1200-3-5-.01(1) for the No. 6 Carbon Brick Press
Board Order 23-87	Hassell and Hughes Lumber Co. Variance Request for Opacity Control	Variance request from Division Rule 1200-3-5-.01(1)
Board Order 24-87	Amendment to Section 2.15 of the State Implementation Plan	Incorporate revised emission standards for total reduced sulfur for Kraft Pulp Mills
Board Order 25-87	Amendment to Section 2.9.12 of the State Implementation Plan	Incorporate revised test methods for chlorine and chlorine compounds
Board Order 26-87	Murray Ohio Certificate of Alternate Control	Variance from Division Rule 1200-3-18-.21 TAPC Regulations
Board Order 27-87	Murray Ohio Certificate of Alternate Control Averaging Times	Variance from Division Rule 1200-3-18-.04 (8) TAPC Regulations
Board Order 28-87	Jehl Cooperage Certificate of Alternate Control	Variance request Division Rule 1200-3-18-.21 TAPC Regulations
Board Order 29-87	Jehl Cooperage Certificate of Alternate Control Averaging Times	Variance from Division Rule 1200-3-18-.4(8) TAPC Regulations
Board Order 30-87	Greif Brothers Corporation Operating Permit	Incorporate Greif Brothers Operating Permit into the State Implementation Plan
Board Order 31-87	Occidental Chemical Corporation Variance Request	Variance from Division Rule 1200-3-5-.01 and .02 TAPC Regulations for Phosphorus Oxide Emissions
Board Order 32-87	Stauffer Chemical Company Variance Request	Variance from Division Rule 1200-3-5-.01 and .02 TAPC Regulations for Phosphorus Oxide Emissions.
Board Order 33-87	Monsanto Company Variance Request	Variance from Division Rule 1200-3-5-.01 and .02 TAPC Regulations for Phosphorus Oxide Emissions

Regulation/ Amendment	Description	Request
1200-3-18-.02(m)	Definitions	Delegation of Authority
1200-3-16-.01(6)(e)	Compliance Standards	Delegation of Authority
1200-3-16-.21	NSPS Primary Aluminum Reduction Plants	Delegation of Authority
1200-3-9-.04(1)(c)	Construction and Operating Permits: Exemptions	Delegation of Authority
1200-3-19-.11(3)	Bristol Non-Attainment Area	Delegation of Authority
1200-3-19-.12(2)	Campbell Co. Non-Attainment Area	Delegation of Authority
1200-3-19-.05(4)	Operating Permits and Emission Limiting Conditions	Delegation of Authority
1200-3-6-.05(4)	Non-Process Visible Emission: Wood Fired Fuel Burning	Delegation of Authority
1200-3-24	Good Engineering Practice Stack Height Regulations	Delegation of Authority

If I may be of further assistance to you, please contact myself or Barry Stephens of my staff.

Sincerely,

Harold E. Hodges, P.E.
Technical Secretary
Tennessee Air Pollution Control Board

HEH/dje/APC-dd5

Enclosure

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF ENVIRONMENT
DIVISION OF AIR POLLUTION CONTROL

IN THE MATTER OF:

DIXICO, INCORPORATED
MEMPHIS

VARIANCE FOR CERTIFICATE OF
ALTERNATE CONTROL
AVERAGING TIMES

ORDER NO. 19-87

BOARD ORDER

Dixico, Incorporated, has requested a variance from the Tennessee Air Pollution Control Regulations as pertains to the averaging time for demonstrating compliance with an alternate emission standard. The purpose of this request is to allow the company to average emissions over a twenty-four-hour period. A provision of paragraph 1200-3-18-.04(8) specifies eight hours as the maximum time over which averaging is to be allowed. A revision to this paragraph establishing twenty-four hours as the maximum time over which averaging is to be allowed has been approved by the Board but is not yet effective.

The Board hereby grants a variance from the provision of paragraph 1200-3-18-.04(8) specifying eight hours as the maximum allowable averaging time, subject to the condition that twenty-four hours shall be the maximum allowable averaging time for demonstrating compliance with an alternate emission standard for volatile organic compound emissions from the Dixico, Incorporated, plant. This variance is valid from November 19, 1987 until November 18, 1988.

Approved by the following Board members on October 2, 1987

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
CUSTOMS HOUSE
701 BROADWAY
NASHVILLE, TENNESSEE 37219-5403

JAN 06 1988

Mr. Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

Dear Mr. Miller:

Enclosed is the official submittal of regulatory and non-regulatory revisions of the State Implementation Plan. Included in this official submittal is the required technical support information for each item. These revisions were adopted following a public hearing. The revisions approved by the Tennessee Air Pollution Control Board and officially submitted include the following items:

Item	Description	Request
Board Order 06-87	Milan Army Ammunition Variance Alternate Method of Determining Allowable Particulate Emission Standard	Variance from Division Rule 1200-3-3-.03
Board Order 07-87	William L. Bonnell Co. Variance Request for Use of Special Coating	Variance from Division Rule 1200-3-18-.21 until September 16, 1988
Board Order 08-87	State Industries, Inc. Variance Request for Certificate of Alternate Control Averaging times	Variance from Division Rule 1200-3-18-.04(8) until August 12, 1988
Board Order 09-87	E. I. Dupont Denemours & Co. Variance request from Sulfur Dioxide Ambient Air monitoring Requirements	Variance from Division Rule 1200-3-3-.03 until June 2, 1988
Board Order 10-87	Proposed Amendment to the Metropolitan-Davidson County Portion of the SIP Regulation No. 3--New Source Review, Modeling Guidelines	Amendment to Section 3-3, Prevention of Significant Deterioration (PSD) Review

Board Order 11-87	Harman Automotive, Inc. Variance Request for Certificate of Alternate Control Averaging Times	Variance from Division Rule 1200-3-18-.04(8) until September 16, 1988
Board Order 12-87	Monsanto Company Variance Request for Certificate of Alternate Emission Standards	Variance from Division Rules 1200-3-7-.04(2) and 1200-3-5-.01(1) until May 1, 1988
Board Order 13-87	Tennessee Eastman Company deletion of Operating Permits (SIP Permits)	Deletion of operating permits (SIP Permits) and replacement by Non-SIP construction permits due to source modification
Board Order 14-87	General Smelting and Refining Company deletion of Operating Permits (SIP Permits)	Deletion of operating permits (SIP Permits) and replacement by Non-SIP construction permits due to source modification
Board Order 15-87	Adoption of Nonregulatory Portion of the SIP: 2.8.1.B Prevention of Significant Air Quality Deterioration	Amend to Section 2.8.1.B to update reference to Air Quality Modelling Guidelines
Board Order 16-87	Amendment to Section 1.3 Table 1B to Reclassify New Johnsonville Sulfur Dioxide Secondary Nonattainment Area	Amend to Section 1.3 Table 1B of the SIP for meeting Ambient Air Quality Standards
Board Order 19-87	Dixico Incorporated Memphis, Tennessee Variance for Certificate of Alternate Control Averaging Times	Variance request to allow the company to average emissions over a 24-hour period.
Board Order 20-87	Murray Ohio Manufacturing Company, Lawrenceburg, Tenn. Variance for Coating Bicycles	Variance request from Division Rule 1200-3-18-.21
Board Order 21-87	North American Rayon Corp. Variance Request for Emergency Operation of Uncontrolled Boilers 1 and 2	Variance request from Division Rules 1200-3-6-.02; 1200-3-5-.01; and 1200-3-9-.02 for emergency operation of Boilers 1 and 2

Board Order 22-87	Union Carbide Corporation Variance Request for Opacity Control	Variance request from Division Rule 1200-3-5-.01(1) for the No. 6 Carbon Brick Press
Board Order 23-87	Hassell and Hughes Lumber Co. Variance Request for Opacity Control	Variance request from Division Rule 1200-3-5-.01(1)
Board Order 24-87	Amendment to Section 2.15 of the State Implementation Plan	Incorporate revised emission standards for total reduced sulfur for Kraft Pulp Mills
Board Order 25-87	Amendment to Section 2.9.12 of the State Implementation Plan	Incorporate revised test methods for chlorine and chlorine compounds
Board Order 26-87	Murray Ohio Certificate of Alternate Control	Variance from Division Rule 1200-3-18-.21 TAPC Regulations
Board Order 27-87	Murray Ohio Certificate of Alternate Control Averaging Times	Variance from Division Rule 1200-3-18-.04 (8) TAPC Regulations
Board Order 28-87	Jehl Cooperage Certificate of Alternate Control	Variance request Division Rule 1200-3-18-.21 TAPC Regulations
Board Order 29-87	Jehl Cooperage Certificate of Alternate Control Averaging Times	Variance from Division Rule 1200-3-18-.4(8) TAPC Regulations
Board Order 30-87	Greif Brothers Corporation Operating Permit	Incorporate Greif Brothers Operating Permit into the State Implementation Plan
Board Order 31-87	Occidental Chemical Corporation Variance Request	Variance from Division Rule 1200-3-5-.01 and .02 TAPC Regulations for Phosphorus Oxide Emissions
Board Order 32-87	Stauffer Chemical Company Variance Request	Variance from Division Rule 1200-3-5-.01 and .02 TAPC Regulations for Phosphorus Oxide Emissions.
Board Order 33-87	Monsanto Company Variance Request	Variance from Division Rule 1200-3-5-.01 and .02 TAPC Regulations for Phosphorus Oxide Emissions

Regulation/ Amendment	Description	Request
1200-3-18-.02(m)	Definitions	Delegation of Authority
1200-3-16-.01(6)(e)	Compliance Standards	Delegation of Authority
1200-3-16-.21	NSPS Primary Aluminum Reduction Plants	Delegation of Authority
1200-3-9-.04(1)(c)	Construction and Operating Permits: Exemptions	Delegation of Authority
1200-3-19-.11(3)	Bristol Non-Attainment Area	Delegation of Authority
1200-3-19-.12(2)	Campbell Co. Non-Attainment Area	Delegation of Authority
1200-3-19-.05(4)	Operating Permits and Emission Limiting Conditions	Delegation of Authority
1200-3-6-.05(4)	Non-Process Visible Emission: Wood Fired Fuel Burning	Delegation of Authority
1200-3-24	Good Engineering Practice Stack Height Regulations	Delegation of Authority

If I may be of further assistance to you, please contact myself or Barry Stephens of my staff.

Sincerely,

Harold E. Hodges, P.E.
Technical Secretary
Tennessee Air Pollution Control Board

HEH/dje/APC-dd5

Enclosure

DIVISION OF AIR POLLUTION CONTROL

IN THE MATTER OF:

MURRAY OHIO MANUFACTURING CO.
LAWRENCEBURG

ORDER NO. 27-87

VARIANCE FOR CERTIFICATE OF
ALTERNATE CONTROL
AVERAGING TIMES

BOARD ORDER

Murray Ohio Manufacturing Company has requested a variance from the Tennessee Air Pollution Control Regulations as pertains to the averaging time for demonstrating compliance with an alternate emission standard. The purpose of this request is to allow the company to average emissions over a twenty-four-hour period. The provision of paragraph 1200-3-18-.04(8) specifies eight hours as the maximum time over which averaging is to be allowed. A revision to this paragraph establishing twenty-four hours as the maximum time over which averaging is to be allowed has been approved by the Board.

The Board hereby grants a variance from the provision of paragragh 1200-3-18-.04(8) specifying eight hours as the maximum allowable averaging time, subject to the condition that twenty-four-hours shall be the maximum allowable averaging time for demonstrating compliance with an alternate emission standard for volatile organic compound emissions from the Murray Ohio Manufacturing Company plant. This variance is valid until December 9, 1988.

Approved by the following Board members on December 10, 1987.

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
CUSTOMS HOUSE
701 BROADWAY
NASHVILLE, TENNESSEE 37219-5403

JAN 06 1988

Mr. Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

Dear Mr. Miller:

Enclosed is the official submittal of regulatory and non-regulatory revisions of the State Implementation Plan. Included in this official submittal is the required technical support information for each item. These revisions were adopted following a public hearing. The revisions approved by the Tennessee Air Pollution Control Board and officially submitted include the following items:

Item	Description	Request
Board Order 06-87	Milan Army Ammunition Variance Alternate Method of Determining Allowable Particulate Emission Standard	Variance from Division Rule 1200-3-3-.03
Board Order 07-87	William L. Bonnell Co. Variance Request for Use of Special Coating	Variance from Division Rule 1200-3-18-.21 until September 16, 1988
Board Order 08-87	State Industries, Inc. Variance Request for Certificate of Alternate Control Averaging times	Variance from Division Rule 1200-3-18-.04(8) until August 12, 1988
Board Order 09-87	E. I. Dupont Denemours & Co. Variance request from Sulfur Dioxide Ambient Air monitoring Requirements	Variance from Division Rule 1200-3-3-.03 until June 2, 1988
Board Order 10-87	Proposed Amendment to the Metropolitan-Davidson County Portion of the SIP Regulation No. 3--New Source Review, Modeling Guidelines	Amendment to Section 3-3, Prevention of Significant Deterioration (PSD) Review

Board Order 11-87	Harman Automotive, Inc. Variance Request for Certificate of Alternate Control Averaging Times	Variance from Division Rule 1200-3-18-.04(8) until September 16, 1988
Board Order 12-87	Monsanto Company Variance Request for Certificate of Alternate Emission Standards	Variance from Division Rules 1200-3-7-.04(2) and 1200-3-5-.01(1) until May 1, 1988
Board Order 13-87	Tennessee Eastman Company deletion of Operating Permits (SIP Permits)	Deletion of operating permits (SIP Permits) and replacement by Non-SIP construction permits due to source modification
Board Order 14-87	General Smelting and Refining Company deletion of Operating Permits (SIP Permits)	Deletion of operating permits (SIP Permits) and replacement by Non-SIP construction permits due to source modification
Board Order 15-87	Adoption of Nonregulatory Portion of the SIP: 2.8.1.B Prevention of Significant Air Quality Deterioration	Amend to Section 2.8.1.B to update reference to Air Quality Modelling Guidelines
Board Order 16-87	Amendment to Section 1.3 Table 1B to Reclassify New Johnsonville Sulfur Dioxide Secondary Nonattainment Area	Amend to Section 1.3 Table 1B of the SIP for meeting Ambient Air Quality Standards
Board Order 19-87	Dixico Incorporated Memphis, Tennessee Variance for Certificate of Alternate Control Averaging Times	Variance request to allow the company to average emissions over a 24-hour period.
Board Order 20-87	Murray Ohio Manufacturing Company, Lawrenceburg, Tenn. Variance for Coating Bicycles	Variance request from Division Rule 1200-3-18-.21
Board Order 21-87	North American Rayon Corp. Variance Request for Emergency Operation of Uncontrolled Boilers 1 and 2	Variance request from Division Rules 1200-3-6-.02; 1200-3-5-.01; and 1200-3-9-.02 for emergency operation of Boilers 1 and 2

Board Order 22-87	Union Carbide Corporation Variance Request for Opacity Control	Variance request from Division Rule 1200-3-5-.01(1) for the No. 6 Carbon Brick Press
Board Order 23-87	Hassell and Hughes Lumber Co. Variance Request for Opacity Control	Variance request from Division Rule 1200-3-5-.01(1)
Board Order 24-87	Amendment to Section 2.15 of the State Implementation Plan	Incorporate revised emission standards for total reduced sulfur for Kraft Pulp Mills
Board Order 25-87	Amendment to Section 2.9.12 of the State Implementation Plan	Incorporate revised test methods for chlorine and chlorine compounds
Board Order 26-87	Murray Ohio Certificate of Alternate Control	Variance from Division Rule 1200-3-18-.21 TAPC Regulations
Board Order 27-87	Murray Ohio Certificate of Alternate Control Averaging Times	Variance from Division Rule 1200-3-18-.04 (8) TAPC Regulations
Board Order 28-87	Jehl Cooperage Certificate of Alternate Control	Variance request Division Rule 1200-3-18-.21 TAPC Regulations
Board Order 29-87	Jehl Cooperage Certificate of Alternate Control Averaging Times	Variance from Division Rule 1200-3-18-.4(8) TAPC Regulations
Board Order 30-87	Greif Brothers Corporation Operating Permit	Incorporate Greif Brothers Operating Permit into the State Implementation Plan
Board Order 31-87	Occidental Chemical Corporation Variance Request	Variance from Division Rule 1200-3-5-.01 and .02 TAPC Regulations for Phosphorus Oxide Emissions
Board Order 32-87	Stauffer Chemical Company Variance Request	Variance from Division Rule 1200-3-5-.01 and .02 TAPC Regulations for Phosphorus Oxide Emissions.
Board Order 33-87	Monsanto Company Variance Request	Variance from Division Rule 1200-3-5-.01 and .02 TAPC Regulations for Phosphorus Oxide Emissions

Regulation/ Amendment	Description	Request
1200-3-18-.02(m)	Definitions	Delegation of Authority
1200-3-16-.01(6)(e)	Compliance Standards	Delegation of Authority
1200-3-16-.21	NSPS Primary Aluminum Reduction Plants	Delegation of Authority
1200-3-9-.04(1)(c)	Construction and Operating Permits: Exemptions	Delegation of Authority
1200-3-19-.11(3)	Bristol Non-Attainment Area	Delegation of Authority
1200-3-19-.12(2)	Campbell Co. Non-Attainment Area	Delegation of Authority
1200-3-19-.05(4)	Operating Permits and Emission Limiting Conditions	Delegation of Authority
1200-3-6-.05(4)	Non-Process Visible Emission: Wood Fired Fuel Burning	Delegation of Authority
1200-3-24	Good Engineering Practice Stack Height Regulations	Delegation of Authority

If I may be of further assistance to you, please contact myself or Barry Stephens of my staff.

Sincerely,

Harold E. Hodges, P.E.
Technical Secretary
Tennessee Air Pollution Control Board

HEH/dje/APC-dd5

Enclosure

Certified # P 307 583 278

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
CUSTOMS HOUSE
701 BROADWAY
NASHVILLE, TENNESSEE 37219-5403

February 25, 1988

Mr. Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division
U.S. EPA, Region IV
345 Courtland Street
Atlanta, GA 30365

Dear Mr. Miller:

Enclosed is the official submittal of revisions of the State Implementation Plan. Included in this official submittal is the required technical support information for each item. These revisions were adopted following a public hearing. The revisions approved by the Tennessee Air Pollution Control Board and officially submitted include the following items:

Item	Description	Request
Board Order 2-88	Bryce Corporation Variance for Certificate of Alternate Control Averaging Times for Volatile Organic Compound Emissions	Variance From the Division Rule 1200-3-18 -.04(8)
Board Order 4-88	Avco Aerostructures Request for Certificate of Alternate Control for Volatile Organic Compound Emissions	Certificate of Alternate Control

If I may be of any further assistance to you, please contact myself or Barry Stephens of my staff at (615)741-3931.

Sincerely,

Harold E. Hodges

Harold E. Hodges, P.E.
Technical Secretary
Tennessee Air Pollution Control Board

cc: Paul Bontrager
Helyn Keith

METROPOLITAN HEALTH DEPARTMENT
311 – 23rd Avenue, North
Nashville, Tennessee 37203
(615) 327-9313

OPERATING PERMIT NUMBER: 42-3

Date Issued: Date Expires:

Permittee: Avco Aerostructures/Textron
Mr. Steve Dunn, Staff Engineer

Installation Address: 1431 Vultee Boulevard
Nashville, Tennessee

Emission Source Number: B-30C, B-2A-PS, B30-PS (1-9)

Emission Source Description: Fine paint spray booth used in coating of miscellaneous aircraft parts. Booths B30-PS (7&9) are to be controlled by a Regenerative Environmental Equipment Company Model VFC natural gas-fired thermal oxidizer.

Conditions:

(1) The allowable emission standard for any pollutant not listed below shall be zero (lb/hr). The emission points covered by this permit must meet the following emission standards and operating schedule:

Emission Point	Emission Standards Mass: LB/HR	LB/Rolling 12 Months	Visible (%)	Operating Schedule Hr/Day	Hr/Yr
-30C, B-2A-PS 30-PS (1-9)	VOC - * lb/day	**	0%	24	8760

The allowable non-VOC emissions from this source are the products of combustion of a maximum of 8,500 $ft.^3$ of natural gas per hour.

*As determined in accordance with Section 7-20, "Emission Standards for Surface Coating Aerospace Assembly and Components" of Regulation No. 7, "Regulation For Control of Volatile Organic Compounds".

**The total facility's annual VOC emissions shall not exceed 74,000 lb/ rolling 12 months.

Conditions Continued on Page 2

IF THE ABOVE CONDITIONS ARE VIOLATED, THIS PERMIT IS VOID.

Permission has been granted to maintain and operate the aforementioned equipment or process in Davidson County, Tennessee under and in accordance with any applicable statutes, ordinances, regulations, or other provisions of law including additions, deletions, or modifications which may be hereafter enacted or promulgated.

Director of Health

Director, Pollution Control Division

(9) Any waste paint, primer or solvent not included in the annual emission inventory must be stored in sealed containers, inventoried separately and disposed of in accordance with the Rules Governing Hazardous Waste Disposal in Tennessee.

Conditions Continued

(5) The total facility's annual VOC emissions shall not exceed 74,000 lb/rolling 12 months.

(6) The following daily records shall be maintained to demonstrate compliance:

(a) The quantity of each coating applied.

(b) The volatile organic compound content of each coating applied.

(c) Daily calculations of allowable emissions according to Attachment II.

(d) Daily calculations of total actual emissions according to Attachment I.

(7) A summary of the daily allowables and actual emissions shall be submitted to the Metropolitan Health Department Bureau of Pollution control quarterly. This report is due in the Bureau of Pollution Control's office by the 10th working day after the last day of each calendar quarter.

(8) Any waste paint, primer, or solvent not included in the annual emission inventory must be stored in sealed containers, inventoried separately and disposed of in accordance with the Rules Governing Hazardous Waste Disposal in Tennessee.

Conditions Continued

(5) The total facility's annual VOC emissions shall not exceed 74,000 lb/rolling 12 months.

(6) The following daily records shall be maintained to demonstrate compliance:

(a) The quantity of each coating applied.

(b) The volatile organic compound content of each coating applied.

(c) Daily calculations of allowable emissions according to Attachment II.

(d) Daily calculations of total actual emissions according to Attachment I.

(7) A summary of the daily allowables and actual emissions shall be submitted to the Metropolitan Health Department Bureau of Pollution control quarterly. This report is due in the Bureau of Pollution Control's office by the 10th working day after the last day of each calendar quarter.

(8) Any waste paint, primer, or solvent not included in the annual emission inventory must be stored in sealed containers, inventoried separately and disposed of in accordance with the Rules Governing Hazardous Waste Disposal in Tennessee.

Conditions Continued

(5) The total facility's annual VOC emissions shall not exceed 74,000 lb/rolling 12 months.

(6) The following daily records shall be maintained to demonstrate compliance:

(a) The quantity of each coating applied.

(b) The volatile organic compound content of each coating applied.

(c) Daily calculations of allowable emissions according to Attachment II.

(d) Daily calculations of total actual emissions according to Attachment I.

(7) A summary of the daily allowables and actual emissions shall be submitted to the Metropolitan Health Department Bureau of Pollution control quarterly. This report is due in the Bureau of Pollution Control's office by the 10th working day after the last day of each calendar quarter.

(8) Any waste paint, primer, or solvent not included in the annual emission inventory must be stored in sealed containers, inventoried separately and disposed of in accordance with the Rules Governing Hazardous Waste Disposal in Tennessee.

Conditions Continued

(5) The total facility's annual VOC emissions shall not exceed 74,000 lb/rolling 12 months.

(6) The following daily records shall be maintained to demonstrate compliance:

(a) The quantity of each coating applied.

(b) The volatile organic compound content of each coating applied.

(c) Daily calculations of allowable emissions according to Attachment II.

(d) Daily calculations of total actual emissions according to Attachment I.

(7) A summary of the daily allowables and actual emissions shall be submitted to the Metropolitan Health Department Bureau of Pollution control quarterly. This report is due in the Bureau of Pollution Control's office by the 10th working day after the last day of each calendar quarter.

(8) Any waste paint, primer, or solvent not included in the annual emission inventory must be stored in sealed containers, inventoried separately and disposed of in accordance with the Rules Governing Hazardous Waste Disposal in Tennessee.

Conditions Continued

(5) The total facility's annual VOC emissions shall not exceed 74,000 lb/rolling 12 months.

(6) The following daily records shall be maintained to demonstrate compliance:

(a) The quantity of each coating applied.

(b) The volatile organic compound content of each coating applied.

(c) Daily calculations of allowable emissions according to Attachment II.

(d) Daily calculations of total actual emissions according to Attachment I.

(7) A summary of the daily allowables and actual emissions shall be submitted to the Metropolitan Health Department Bureau of Pollution control quarterly. This report is due in the Bureau of Pollution Control's office by the 10th working day after the last day of each calendar quarter.

(8) Any waste paint, primer, or solvent not included in the annual emission inventory must be stored in sealed containers, inventoried separately and disposed of in accordance with the Rules Governing Hazardous Waste Disposal in Tennessee.

Conditions Continued

(5) The total facility's annual VOC emissions shall not exceed 74,000 lb/rolling 12 months.

(6) The following daily records shall be maintained to demonstrate compliance:

(a) The quantity of each coating applied.

(b) The volatile organic compound content of each coating applied.

(c) Daily calculations of allowable emissions according to Attachment II.

(d) Daily calculations of total actual emissions according to Attachment I.

(7) A summary of the daily allowables and actual emissions shall be submitted to the Metropolitan Health Department Bureau of Pollution control quarterly. This report is due in the Bureau of Pollution Control's office by the 10th working day after the last day of each calendar quarter.

(8) Any waste paint, primer, or solvent not included in the annual emission inventory must be stored in sealed containers, inventoried separately and disposed of in accordance with the Rules Governing Hazardous Waste Disposal in Tennessee.

Conditions Continued

(5) The total facility's annual VOC emissions shall not exceed 74,000 lb/rolling 12 months.

(6) The following daily records shall be maintained to demonstrate compliance:

(a) The quantity of each coating applied.

(b) The volatile organic compound content of each coating applied.

(c) Daily calculations of allowable emissions according to Attachment II.

(d) Daily calculations of total actual emissions according to Attachment I.

(7) A summary of the daily allowables and actual emissions shall be submitted to the Metropolitan Health Department Bureau of Pollution control quarterly. This report is due in the Bureau of Pollution Control's office by the 10th working day after the last day of each calendar quarter.

(8) Any waste paint, primer, or solvent not included in the annual emission inventory must be stored in sealed containers, inventoried separately and disposed of in accordance with the Rules Governing Hazardous Waste Disposal in Tennessee.

Conditions Continued

(5) The total facility's annual VOC emissions shall not exceed 74,000 lb/rolling 12 months.

(6) The following daily records shall be maintained to demonstrate compliance:

(a) The quantity of each coating applied.

(b) The volatile organic compound content of each coating applied.

(c) Daily calculations of allowable emissions according to Attachment II.

(d) Daily calculations of total actual emissions according to Attachment I.

(7) A summary of the daily allowables and actual emissions shall be submitted to the Metropolitan Health Department Bureau of Pollution control quarterly. This report is due in the Bureau of Pollution Control's office by the 10th working day after the last day of each calendar quarter.

(8) Any waste paint, primer, or solvent not included in the annual emission inventory must be stored in sealed containers, inventoried separately and disposed of in accordance with the Rules Governing Hazardous Waste Disposal in Tennessee.

Conditions Continued

(5) The total facility's annual VOC emissions shall not exceed 74,000 lb/rolling 12 months.

(6) The following daily records shall be maintained to demonstrate compliance:

(a) The quantity of each coating applied.

(b) The volatile organic compound content of each coating applied.

(c) Daily calculations of allowable emissions according to Attachment II.

(d) Daily calculations of total actual emissions according to Attachment I.

(7) A summary of the daily allowables and actual emissions shall be submitted to the Metropolitan Health Department Bureau of Pollution control quarterly. This report is due in the Bureau of Pollution Control's office by the 10th working day after the last day of each calendar quarter.

(8) Any waste paint, primer, or solvent not included in the annual emission inventory must be stored in sealed containers, inventoried separately and disposed of in accordance with the Rules Governing Hazardous Waste Disposal in Tennessee.

6. The following daily records shall be maintained to demonstrate compliance:

   (a) For each booth the quantity of each coating applied.

   (b) For each booth the volatile organic compound content of each coating applied.

   (c) Daily calculations of allowable emissions according to Attachment II.

   (d) Daily calculations of total actual emissions according to Attachment I.

7. A summary of the daily allowables and actual emissions shall be submitted to the Metropolitan Health Department Bureau of Pollution Control quarterly, per Attachment III. The quarterly report must also include the date, time and duration of any down-time for the thermal oxidizer. This report is due to the Bureau of Pollution Control's office by the 10th working day after the last day of each calendar quarter.

8. All records required by paragraphs (6) and (7) must be maintained for at least two years.

9. Attachment IV is a copy of Operating Permits 42-3 thru 42-10, 42-18 and 42-9 for Avco Aerostructures/Textron's surface coating operations.

ATTACHMENT II

ALLOWABLE VOLATILE ORGANIC COMPOUND (VOC) EMISSIONS

Yearly allowable plant wide:

74,000 pounds VOC/year from all coating operations

Daily allowable plant wide:

800 pounds VOC/day or 365 Kg VOC/day from all coating operations.

Daily allowable shall be calculated using the following equation:

Pounds VOC/daily = 4.78 (gallons solid) primer + 15.62 (gallons solid) topcoats + 2.94 (gallons solid) temporary top coating + 15.62 (gallons solid) fuel tank coatings + (gallon exempt coatings)(pounds VOC/gallon)

Gallons of solid shall be calculated using the following equation:

$$\text{gallon solids} = \left[1 - \frac{\text{pound VOC/gal coating}}{\text{density of VOC lb/gallon}}\right] (\text{gallons of coating})$$

The plant wide allowable includes a 20% reduction from the baseline emissions in accordance with EPA, December 4, 1986, Emission Trading Policy.

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Air Pollution Control
9th Floor, L & C Annex
401 Church Street
Nashville, TN 37243-1531

APR 14 1997

CERTIFIED MAIL # Z 702 179 028
RETURN RECEIPT REQUESTED

Mr. John H. Hankinson, Jr.
Regional Administrator
US EPA Region IV
APTMD - 12th Floor
Atlanta Federal Center
100 Alabama Street. S. W.
Atlanta, GA 30303

RE: Official Submittal of Seven Amended Agreed Orders to Revise the Hamilton County Portion of the Tennessee SIP

Dear Mr. Hankinson:

This is an official submittal of seven Amended Agreed Orders to amend the Hamilton County portion of the State Implementation Plan. The Chattanooga-Hamilton County Air Pollution Control Board officially adopted the Amended Agreed Orders at its February 3, 1997 board meeting. The Amended Agreed Orders (Board Resolutions) are outlined in Board Order No. 97-63 Attachment I and II technical supporting documents.

As required three copies have been included with the necessary technical support documentation consisting of the following: a copy of the December 23, 1996 Notice of Public Hearing; a copy of the February 3, 1997 public hearing meeting minutes; copies of the seven Amended Agreed Orders; copies of seven Petitions to amend the 1989 Agreed Orders; Board Resolutions authorizing the Director to issue federally enforceable Certificates of Operation to these seven companies; and Tennessee Air Pollution Control Board Order No. 03-89, dated May 10, 1989 and Board Order No. 97-63, dated March 12, 1997.

The Environmental Protection Agency is requested to process the enclosed Amended Agreed Orders to revise the Hamilton County portion of the Tennessee SIP in accordance with Title 40 CFR Part 51, Appendix V.

If you have any questions concerning this submittal, please contact Mr. Hubie Stephens of my staff at (615) 532-0558.

Sincerely,

Original Signed By
John W Walton

John W. Walton, P. E.
Technical Secretary
Tennessee Air Pollution Control Board

HGSJR229

Enclosures

CC: Ms. Linda Anderson-Carnahan, EPA
Ms. Kelly Fortin, EPA
Mr. Robert H. Colby, Chattanooga, TN
Mr. Hubie Stephens, TDAPC, Nashville, TN

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
BUREAU OF ENVIRONMENT
DIVISION OF AIR POLLUTION CONTROL

IN THE MATTER OF:	)	
	)	
PROPOSED AMENDMENT TO THE	)	
HAMILTON COUNTY PORTION OF	)	ORDER NO. 97-63
THE STATE IMPLEMENTATION PLAN (SIP)	)	
	)	
TO INCORPORATE SEVEN AMENDED	)	
AGREED ORDERS SIP REVISION	)	
	)	

BOARD ORDER

The following matter came before the Tennessee Air Pollution Control Board on March 12, 1997.

On June 28, 1989, the U. S. Environmental Protection Agency approved into the Tennessee State Implementation Plan (SIP) Agreed Orders for fourteen (14) miscellaneous metal parts coaters [54 FR 27164-66]. These Agreed Orders restricted volatile organic compound (VOC) emissions from activities that EPA indicated were otherwise subject to T.A.R. 1200-3-18-.21(§4=41, Rule 25.21, Chattanooga Air Pollution Control Ordinance), the miscellaneous metal coatings RACT rule. That SIP revision occurred in conjunction with redesignation to attainment status for ozone of the Chattanooga/Hamilton County air quality planning area.

On February 3, 1997, the Chattanooga/Hamilton County Air Pollution Control Board held a public hearing to receive public comments concerning proposed federally enforceable Certification of Operation to be issued to seven companies which requested additional federally enforceable limits on their potential to emit (VOC emissions) and to qualify as synthetic minor sources. The Chattanooga/Hamilton County Air Pollution Control Board has entered into Amended Agreed Orders with the following seven synthetic minor source companies:

Browning Ferris Industries of TN, Inc. (Formerly Browning Ferris Industries)
EK Associates, L. P. (Formerly Ekco/Glaco, Inc.)
Cannon Equipment Southeast, Inc. (Formerly Cumberland Corporation)
McKee Foods Corporation (formerly McKee Baking Company)
Metal Systems, Inc. (Formerly Electrical Systems, Inc.)
Sherman & Reilly, Incorporated
Tuftco Corporation

These proposed seven Amended Agreed Orders are outlined in the Board Meeting minutes of the February 3, 1997 public hearing. See Attachment I technical support documents.

The Tennessee Division of Air Pollution Control has completed its review of the seven Amended Agreed Orders including seven petitions to amend the 1989 Agreed Orders and finds them acceptable. The proposed Amended Agreed Orders (Board Resolutions) are outlined in Attachment II technical support documents.

With the Tennessee Air Pollution Control Board's approval these seven Amended Agreed Orders will be incorporated into the State Implementation Plan.

Approved by the following members of the Tennessee Air Pollution Control Board on March 12, 1997.

B033

Chattanooga — Hamilton County
Air Pollution Control Bureau

3511 Rossville Boulevard • Chattanooga, Tennessee 37407-2495
(615) 867-4321 Telefax (615) 867-4348

February 24, 1997

John Walton, P.E.
Technical Secretary
Tennessee Air Pollution Control Board
Department of Environment and Conservation
9th Floor, L & C Annex
401 Church Street
Nashville, TN 37243-1531

Subject: Amended Agreed Orders
SIP Revision

Dear Mr. Walton:

On June 28, 1989, the U. S. Environmental Protection Agency approved into the Tennessee State Implementation Plan (SIP) Agreed Orders for fourteen (14) miscellaneous metal parts coaters [54 FR 27164-66]. These Agreed Orders restricted volatile organic compound (VOC) emissions from activities that EPA indicated were otherwise subject to T.A.R. 1200-3-18-.21 (§4-41, Rule 25.21, Chattanooga Air Pollution Control Ordinance), the miscellaneous metal coatings RACT rule. That SIP revision occurred in conjunction with redesignation to attainment status for ozone of the Chattanooga-Hamilton County air quality planning area.

As a result of the 1990 Clean Air Act Amendments and promulgation of Title 40 CFR Part 70, seven (7) of these 14 sources requested additional federally enforceable limits on their potential to emit to qualify as synthetic minor sources. The Chattanooga-Hamilton County Air Pollution Control Board has entered into Amended Agreed Orders with these seven (7) companies:

Browning Ferris Industries of TN, Inc. (formerly Browning Ferris Industries)
EK Associates, L.P. (formerly Ekco/Glaco, Inc.)
Cannon Equipment Southeast, Inc. (formerly Cumberland Corporation)
McKee Foods Corporation (formerly McKee Baking Company)
Metal Systems, Inc. (formerly Electrical Systems, Inc.)
Sherman & Reilly, Incorporated
Tuftco Corporation

This is an official submittal of seven Amended Agreed Orders as revisions to the Hamilton County portion of the Tennessee SIP. Please schedule this matter for consideration at the March 12 meeting of the Tennessee Air Pollution Board.

On behalf of the Chattanooga-Hamilton County Air Pollution Control Board, I hereby request that the State of Tennessee submit the enclosed documentation related to the seven Amended Agreed Orders to U.S. EPA Region IV to revise the Hamilton County portion of the Tennessee SIP in accordance with Title 40 CFR Part 51, Appendix V.

The following items are enclosed to document execution of the Amended Agreed Orders:

(1) Two copies of the Public Hearing Notice published in a newspaper of general circulation;

(2) Two copies of the Chattanooga-Hamilton County Air Pollution Control Board meeting minutes of the February 3, 1997, deliberative session;

(3) Two copies of the record of the February 3, 1997, public hearing; and

(4) Three copies of the seven Amended Agreed Orders.

No written public comments were received.

In addition, the following items are enclosed to provide additional information related to the Amended Agreed Orders:

(a) Two copies of the seven Petitions to amend the 1989 Agreed Orders; and

(b) Two copies of the seven Board resolutions authorizing the Director to issue federally enforceable certificates of operation to these seven companies.

Note that the Director will issue the federally enforceable certificates upon promulgation in the Federal Register of the revision to the Hamilton County portion of the Tennessee SIP including authority to issue federally enforceable certificates of operation [the 1995 108-page ordinance], which is anticipated by the end of February, 1997, according to Kelly Fortin at EPA Region IV.

For your information, three (3) of the 14 companies that entered into Agreed Orders in 1989 are Part 70 sources: Astec Industries; Combustion Engineering, Inc.; and Mueller, Inc. Three (3) other companies that had entered into Agreed Orders in 1989 no longer operate air pollutant sources in Hamilton County: The Landes Company, Inc.; Royal, Inc.; and United States Stove Company.

Finally, the fourteenth company that entered into an Agreed Order in 1989, Chattanooga Armature Works, Inc., has been determined to be a real minor source. Two copies of the Board Resolution containing this determination are also enclosed.

Cordially,

Diane L. Arnst

Diane L. Arnst
Staff Attorney

Enclosures

c: Hubie Stephens (TDEC) (w/single enclosures)
Karen Borel (EPA) (w/single enclosures)
Kay Prince (EPA) (w/o enclosures)

In the Matter of:)

METAL SYSTEMS, INC.)

Docket No. 582.08

PETITION TO THE CHATTANOOGA-HAMILTON COUNTY AIR POLLUTION CONTROL BOARD

1. The Petitioner, Metal Systems, Inc. (formerly Electrical Systems, Inc.) hereby petitions the Chattanooga-Hamilton County Air Pollution Control Board to approve the special conditions set forth in Exhibit A attached hereto as an amendment to the Agreed Order entered into on March 20, 1989, in the matter of Docket No. 582.08. The amended special conditions are more stringent than the special conditions currently required.

2. The Petitioner hereby requests that the special conditions set forth in Exhibit A as Nos. 1 through 10 replace the previous edition of Special Condition Nos. 1 through 7 on Certificate of Operation Nos. 1070-40200101-01C and 1070-40200101-02C previously issued to Metal Systems Inc. by the Director of the Chattanooga-Hamilton County Air Pollution Control Bureau for control of emissions of Volatile Organic Compounds (VOCs) that are Hazardous Air Pollutants (HAPs).

3. The Petitioner hereby requests that the special conditions set forth in Exhibit A as Nos. 1 through 10 be imposed on Certificate of Operation No. 1070-40200101-03C for a paint spray booth added subsequent to the entry of the Agreed Order on March 20, 1989. These conditions will replace the previous edition of Special Condition Nos. 1 through 7 and control emissions of VOCs that are HAPs. Total volatile organic compound actual emissions from all combined surface coating operations within the plant have been less than the permitted amount per year even after the addition of this paint spray booth in 1991.

4. The Petitioner requests that these special conditions for reduction in allowable emissions be imposed upon said Certificates of Operation as federally enforceable conditions to be effective from and after February 3, 1997, which reflect that the Petitioner is a synthetic minor source (as defined in Section 4-2 of the Chattanooga Air Pollution Control Ordinance). These special conditions will limit emissions to less than 10 tons per year of any single hazardous air pollutant; less than 25 tons per year of any combination of hazardous air pollutants and less than 29.99 tons per year of volatile organic compounds.

5. The purpose of this petition is to make the more stringent limitations on allowable emissions federally enforceable for purposes of Part 70 source regulation and permits.

upon request during normal business hours. (This condition is federally enforceable for the purpose of synthetic minor status.)

6. All coating operations at Metal Systems shall be performed using high volume, low pressure (HVLP) spray guns or equivalent equipment as approved by the Director, Chattanooga-Hamilton County Air Pollution Control Bureau. This limitation is Best Available Control Technology (BACT) as determined by the Director, Chattanooga-Hamilton County Air Pollution Control Bureau. (This condition is federally enforceable for the purpose of synthetic minor status.)

7. All spray gun cleaning at Metal Systems shall be performed using a closed loop solvent recycling system or equivalent as approved by the Director, Chattanooga-Hamilton County Air Pollution Control Bureau. This limitation is Best Available Control Technology (BACT) as determined by the Director, Chattanooga-Hamilton County Air Pollution Control Bureau. (This condition is federally enforceable for the purpose of synthetic minor status.)

8. By November 15 of each year, the owner or operator shall submit a written report notifying the Director of the Chattanooga-Hamilton County Air Pollution Control Bureau of the preceding 12-month period emissions for the following: VOC emissions from metal surface coatings, VOC emissions from cleaning solvents, and combined HAP emissions and single HAP emissions from all operations. (This condition is federally enforceable for the purpose of synthetic minor status.)

9. If this source operates, or fails to operate, in such a manner as to cause the emission of air pollutants in excess of any emission standard contained in these special conditions, the owner or operator shall promptly notify the Director, the Chattanooga-Hamilton County Air Pollution Control Bureau, in accordance with Section 8-512 (e) of the Ordinance. Prompt notification shall mean an initial telephone report to the Director within 24 hours after the onset of the excess emissions, followed up by a written report submitted to the Director within 7 days after the onset of the excess emissions. (This condition is federally enforceable for the purpose of synthetic minor status.)

10. Metal Systems and the Chattanooga-Hamilton County Air Pollution Control Bureau mutually agree to reopen this federally enforceable certificate of operation upon promulgation of any new federal requirement that would be applicable to this source if the effective date of the requirement is prior to the expiration date of this certificate. (This condition is federally enforceable for the purpose of synthetic minor status.)

Federally Enforceable Certificate of Operation No. 1070-40200101-02C

The owner and operator of this source shall adhere to the following terms and limitations of this

federally enforceable certificate of operation throughout its term. Any violation of the following terms and conditions may lead to enforcement action by the Chattanooga-Hamilton County Bureau or Board or by the U.S. Environmental Protection Agency or may subject the source to a citizen suit.

1. Volatile organic compound (VOC) emissions from metal surface coatings used by Metal Systems shall not exceed 24.99 tons per rolling 12-month period. Metal Systems has requested this limitation to remain below the applicability threshold of Rule 25.21 of the Chattanooga Air Pollution Control Ordinance. (This condition is federally enforceable for the purpose of synthetic minor status.)

2. VOC emissions from cleaning solvents shall not exceed 5 tons per rolling 12-month period. In accordance with Rule 25 of the Chattanooga Air Pollution Control Ordinance, this limitation has been determined to be Best Available Control Technology (BACT) by the Director of the Chattanooga-Hamilton County Air Pollution Control Bureau. (This condition is federally enforceable for the purpose of synthetic minor status.)

3. Hazardous Air Pollutant (HAP) emissions from all operations at Metal Systems shall be less than 5 tons per rolling 12-month period for any single HAP and less than 10 tons per rolling 12-month period for any combination of HAPs. Metal Systems has requested this limitation in order to remain below the thresholds of Part 70 permitting. (This condition is federally enforceable for the purpose of synthetic minor status.)

4. The owner or operator shall maintain a monthly log of all HAP-containing materials and all VOC-containing materials used at Metal Systems. This log shall contain, at a minimum, the type and quantity of each material used, the pounds of each individual HAP used, the pounds of combined HAPs used, the pounds of VOCs used, and the initials of the operator. The log shall also contain the total combined HAP emissions, the total individual HAP emissions, and the total VOC emissions for the previous 12-month period. This log shall be maintained for a period of two years following date of entry and shall be available for inspection by Bureau representatives upon request during normal business hours. (This condition is federally enforceable for the purpose of synthetic minor status.)

5. The owner or operator shall maintain usage and emissions documentation including purchase orders, invoices, and material safety data sheets for all HAP-containing materials and VOC-containing materials used. The documentation shall be maintained for a period of two years following each usage date and shall be available for inspection by Bureau representatives upon request during normal business hours. (This condition is federally enforceable for the purpose of synthetic minor status.)

6. All coating operations at Metal Systems shall be performed using high volume, low pressure (HVLP) spray guns or equivalent equipment as approved by the Director, Chattanooga-Hamilton County Air Pollution Control Bureau. This limitation is Best Available Control

requested this limitation to remain below the applicability threshold of Rule 25.21 of the Chattanooga Air Pollution Control Ordinance. (This condition is federally enforceable for the purpose of synthetic minor status.)

2. VOC emissions from cleaning solvents shall not exceed 5 tons per rolling 12-month period. In accordance with Rule 25 of the Chattanooga Air Pollution Control Ordinance, this limitation has been determined to be Best Available Control Technology (BACT) by the Director of the Chattanooga-Hamilton County Air Pollution Control Bureau. (This condition is federally enforceable for the purpose of synthetic minor status.)

3. Hazardous Air Pollutant (HAP) emissions from all operations at Metal Systems shall be less than 5 tons per rolling 12-month period for any single HAP and less than 10 tons per rolling 12-month period for any combination of HAPs. Metal Systems has requested this limitation in order to remain below the thresholds of Part 70 permitting. (This condition is federally enforceable for the purpose of synthetic minor status.)

4. The owner or operator shall maintain a monthly log of all HAP-containing materials and all VOC-containing materials used at Metal Systems. This log shall contain, at a minimum, the type and quantity of each material used, the pounds of each individual HAP used, the pounds of combined HAPs used, the pounds of VOCs used, and the initials of the operator. The log shall also contain the total combined HAP emissions, the total individual HAP emissions, and the total VOC emissions for the previous 12-month period. This log shall be maintained for a period of two years following date of entry and shall be available for inspection by Bureau representatives upon request during normal business hours. (This condition is federally enforceable for the purpose of synthetic minor status.)

5. The owner or operator shall maintain usage and emissions documentation including purchase orders, invoices, and material safety data sheets for all HAP-containing materials and VOC-containing materials used. The documentation shall be maintained for a period of two years following each usage date and shall be available for inspection by Bureau representatives upon request during normal business hours. (This condition is federally enforceable for the purpose of synthetic minor status.)

6. All coating operations at Metal Systems shall be performed using high volume, low pressure (HVLP) spray guns or equivalent equipment as approved by the Director, Chattanooga-Hamilton County Air Pollution Control Bureau. This limitation is Best Available Control Technology (BACT) as determined by the Director, Chattanooga-Hamilton County Air Pollution Control Bureau. (This condition is federally enforceable for the purpose of synthetic minor status.)

7. All spray gun cleaning at Metal Systems shall be performed using a closed loop solvent recycling system or equivalent as approved by the Director, Chattanooga-Hamilton County

Kay 4/28 LAC
TN218

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Air Pollution Control
9th Floor L & C Annex
Nashville, Tennessee 37243-1531

April 22, 1999

Certified Mail # P 116 013 041
Return Receipt Requested

Part 5.1
TN-193

Mr. John H. Hankinson, Jr.
Regional Administrator
US EPA Region IV
APTMD - 12th Floor
Atlanta Federal Center
100 Alabama Street, S. W.
Atlanta GA 30303

RE: Revised Amended Agreed Order
Metal Systems, Inc.

Dear Mr. Hankinson:

This is a supplemental submittal of a request for approval of the revised Amended Agreed Order for Metal Systems, Inc. for incorporation into the Hamilton County nonregulatory portion of the State Implementation Plan for Tennessee. US EPA Region IV recently advised the local program that monthly VOC emission limits coupled with daily recordkeeping requirements were necessary to provide practical enforceability in the "Metals Systems, Inc. Amended Agreed Order" in order to approve it into the SIP. We concur in this Order Amendment.

Enclosed are five (5) copies of supporting documentation [Amended Agreed Order - Docket No. 582.08] which will complete the Chattanooga/Hamilton County Air Pollution Control Bureau's program submittal package.

The Environmental Protection Agency is requested to process the enclosed revised Amended Agreed Order - Metal Systems, Inc. for approval into the Hamilton County portion of the SIP.

If you need further information or documentation concerning this submittal, please do not hesitate to call me at 615-532-0554.

Thank you for your cooperation in this important matter.

Sincerely,

Tracy R. Carter

Tracy R. Carter
Technical Secretary
Tennessee Air Pollution Control Board

Enclosures

c: Ms. Linda Anderson-Carnahan - EPA
Ms. Allison Humphris - EPA
Mr. Robert H. Colby - Chattanooga, TN
Hubie G. Stephens - Nashville, TN

HankMetl .doc

SUPPLEMENTAL SIP SUBMITTAL
METAL SYSTEMS, INC.
AMENDED AGREED ORDER
CHATTANOOGA, TENNESSEE

Chattanooga-Hamilton County Air Pollution Control Bureau

April 8, 1999

Tracy Carter, J.D.
Technical Secretary
Tennessee Air Pollution Control Board
9th Floor, L & C Annex
401 Church Street
Nashville, TN 37243-1531

Subject: Revised Amended Agreed Order
Metal Systems, Inc.

Dear Ms. Carter:

On February 24, 1997, we submitted Amended Agreed Orders for seven synthetic minor sources for whom Agreed Orders had been approved into the Tennessee State Implementation Plan (SIP) on June 28, 1989. The Tennessee Air Pollution Control Board submitted the seven Amended Agreed Orders to U.S. EPA Region IV on April 14, 1997, with a request to revise the Hamilton County portion of the Tennessee SIP.

U.S. EPA Region IV advised the local program in correspondence dated February 3, 1999, that monthly emission limits coupled with daily record keeping requirements would be necessary to provide practical enforceability in the Metal Systems, Inc. Amended Agreed Order in order to approve it into the SIP. In correspondence dated February 24, 1999, U.S. EPA Region IV advised that no Amended Agreed Order was needed for former E.K. Associates, L.P. because that source had shut down, selling all of its equipment and real estate. A new owner, Pressco, Inc. subsequently purchased the real estate and installed its own new equipment to begin operating as a new source.

This letter serves as a request to submit the revised Amended Agreed Order for Metal Systems, Inc. for approval into the Hamilton County portion of the SIP.

Very truly yours,

Robert H. Colby
Director

C: Linda Anderson-Carnahan, U.S. EPA, Region IV (w/ enclosure)
Hubie Stephens, TDEC (w/ enclosure)

3511 Rossville Boulevard • Chattanooga, TN 37407 - 2495 • 423-867-4321 • Fax 423-867-4348

BEFORE THE CHATTANOOGA-HAMILTON COUNTY
AIR POLLUTION CONTROL BOARD

In the Matter of:	)	
	)	**DOCKET NO. 582.08**
METAL SYSTEMS, INC.	)	

AMENDED AGREED ORDER

This matter came to be heard this 5th day of April, 1999, upon a petition filed by Metal Systems, Inc. (formerly Electrical Systems, Inc.) which was filed on the 25th day of February, 1999, and which was advertised for public comment hearing on the 3rd day of March, 1999. The petition requested that proposed revised special conditions be approved and made a part of Certificate of Operation Nos. 1070-40200101-01C, 1070-40200101-02C, and 1070-40200101-03C which previously have been issued by the Bureau Director to Metal Systems, Inc. for its paint spray booths located at 1919 West Polymer Drive, Chattanooga, Tennessee 37421. Following the public comment period during which time no adverse comments were received, upon agreement and recommendation of the petitioners, and for good cause shown, it is

ORDERED that Certificate of Operation Nos. 1070-40200101-01C, 1070-40200101-02C, and 1070-40200101-03C previously issued to Metal Systems, Inc. by the Bureau Director be, and hereby are, amended by imposing the following revised Special Conditions Nos. 2 through 11, replacing the previous edition of Special Condition Nos. 2 through 10:

Federally Enforceable Certificate of Operation No. 1070-40200101-01C

The owner and operator of this source shall adhere to the following terms and limitations of this federally enforceable certificate of operation throughout its term. Any violation of the following terms and conditions may lead to enforcement action by the Chattanooga-Hamilton County Air Pollution Control Bureau or Board or by the U.S. Environmental Protection Agency or may subject the source to a citizen suit.

1. Volatile organic compound (VOC) emissions from metal surface coatings used by Metal Systems shall not exceed 24.99 tons per rolling 12-month period. Metal Systems has requested this limitation to remain below the applicability threshold of Rule 25.21 of the Chattanooga Air Pollution Control Ordinance. (This condition is federally enforceable for the purpose of synthetic minor status.)

2. Coating usage at this facility shall not exceed 910 gallons in any consecutive 30-day period. (This condition is federally enforceable for the purpose of synthetic minor status.)

3. The maximum VOC content of the coatings used at this facility shall not exceed 4.5 pounds per gallon as applied. (This condition is federally enforceable for the purpose of synthetic minor status.)

4. Hazardous Air Pollutant (HAP) emissions from all operations at Metal Systems shall be less than 5 tons per rolling 12-month period for any single HAP and less than 10 tons per rolling 12-month period for any combination of HAPs. Metal Systems has requested this limitation in order to remain below the thresholds of Part 70 permitting. (This condition is federally enforceable for the purpose of synthetic minor status.)

5. The owner or operator shall maintain a daily log of all HAP-containing materials and all VOC-containing materials used at Metal Systems. This log shall contain, at a minimum, the type and quantity of each material used, the pounds of each individual HAP used, the pounds of combined HAPs used, the pounds of VOCs used, and the initials of the operator. The log shall also contain the total combined HAP emissions, the total individual HAP emissions, and the total VOC emissions for the previous 12-month period. This log shall be maintained for a period of two years following the date of entry and shall be available for inspection by Bureau representatives upon request during normal business hours. (This condition is federally enforceable for the purpose of synthetic minor status.)

6. The owner or operator shall maintain usage and emissions documentation including purchase orders, invoices, and material safety data sheets for all HAP-containing materials and VOC-containing materials used. The documentation shall be maintained for a period of two years following each usage date and shall be available for inspection by Bureau representatives upon request during normal business hours. (This condition is federally enforceable for the purpose of synthetic minor status.)

7. All coating operations at Metal Systems shall be performed using high volume, low pressure (HVLP) spray guns or equivalent as approved by the Director, Chattanooga-Hamilton County Air Pollution Control Bureau. This limitation is Best Available Control Technology (BACT) as determined by the Director, Chattanooga-Hamilton County Air Pollution Control Bureau. (This condition is federally enforceable for the purpose of synthetic minor status.)

8. All spray gun cleaning at Metal Systems shall be performed using a closed loop solvent recycling system or equivalent as approved by the Director, Chattanooga-Hamilton County Air Pollution Control Bureau. This limitation is Best Available Control Technology (BACT) as determined by the Director, Chattanooga-Hamilton County Air Pollution Control Bureau. (This condition is federally enforceable for the purpose of synthetic minor status.)

9. By November 15 of each year, the owner or operator shall submit a written report notifying the Director of the Chattanooga-Hamilton County Air Pollution Control Bureau of the preceding 12-month period emissions for the following: VOC emissions from metal surface coatings, VOC emissions from cleaning solvents, and combined HAP emissions and single HAP emissions from all operations. (This condition is federally enforceable for the purpose of synthetic minor status.)

10. If this source operates, or fails to operate, in such a manner as to cause the emission of air pollutants in excess of any emission standard contained in these special conditions, the owner or operator shall promptly notify the Director, the Chattanooga-Hamilton County Air Pollution Control Bureau, in accordance with Section 4-12(e) of the Ordinance. Prompt notification shall mean an initial telephone report to the Director within 24 hours after the onset of the excess emissions, followed up by a written report submitted to the Director within 7 days after the onset of the excess emissions. (This condition is federally enforceable for the purpose of synthetic minor status.)

11. Metal Systems and the Chattanooga-Hamilton County Air Pollution Control Bureau mutually agree to reopen this federally enforceable certificate of operation upon promulgation of any new federal requirement that would be applicable to this source if the effective date of the requirement is prior to the expiration date of this certificate. (This condition is federally enforceable for the purpose of synthetic minor status.)

Federally Enforceable Certificate of Operation No. 1070-40200101-02C

The owner and operator of this source shall adhere to the following terms and limitations of this federally enforceable certificate of operation throughout its term. Any violation of the following terms and conditions may lead to enforcement action by the Chattanooga-Hamilton County Air Pollution Control Bureau or Board or by the U.S. Environmental Protection Agency or may subject the source to a citizen suit.

1. Volatile organic compound (VOC) emissions from metal surface coatings used by Metal Systems shall not exceed 24.99 tons per rolling 12-month period. Metal Systems has requested this limitation to remain below the applicability threshold of Rule 25.21 of the Chattanooga Air Pollution Control Ordinance. (This condition is federally enforceable for the purpose of synthetic minor status.)

2. Coating usage at this facility shall not exceed 910 gallons in any consecutive 30-day period. (This condition is federally enforceable for the purpose of synthetic minor status.)

3. The maximum VOC content of the coatings used at this facility shall not exceed 4.5 pounds per gallon as applied. (This condition is federally enforceable for the purpose of synthetic minor status.)

4. Hazardous Air Pollutant (HAP) emissions from all operations at Metal Systems shall be less than 5 tons per rolling 12-month period for any single HAP and less than 10 tons per rolling 12-month period for any combination of HAPs. Metal Systems has requested this limitation in order to remain below the thresholds of Part 70 permitting. (This condition is federally enforceable for the purpose of synthetic minor status.)

5. The owner or operator shall maintain a daily log of all HAP-containing materials and all VOC-containing materials used at Metal Systems. This log shall contain, at a minimum, the type and quantity of each material used, the pounds of each individual HAP used, the pounds of combined HAPs used, the pounds of VOCs used, and the initials of the operator. The log shall also contain the total combined HAP emissions, the total individual HAP emissions, and the total VOC emissions for the previous 12-month period. This log shall be maintained for a period of two years following the date of entry and shall be available for inspection by Bureau representatives upon request during normal business hours. (This condition is federally enforceable for the purpose of synthetic minor status.)

6. The owner or operator shall maintain usage and emissions documentation including purchase orders, invoices, and material safety data sheets for all HAP-containing materials and VOC-containing materials used. The documentation shall be maintained for a period of two years following each usage date and shall be available for inspection by Bureau representatives upon request during normal business hours. (This condition is federally enforceable for the purpose of synthetic minor status.)

7. All coating operations at Metal Systems shall be performed using high volume, low pressure (HVLP) spray guns or equivalent as approved by the Director, Chattanooga-Hamilton County Air Pollution Control Bureau. This limitation is Best Available Control Technology (BACT) as determined by the Director, Chattanooga-Hamilton County Air Pollution Control Bureau. (This condition is federally enforceable for the purpose of synthetic minor status.)

8. All spray gun cleaning at Metal Systems shall be performed using a closed loop solvent recycling system or equivalent as approved by the Director, Chattanooga-Hamilton County Air Pollution Control Bureau. This limitation is Best Available Control Technology (BACT) as determined by the Director, Chattanooga-Hamilton County Air Pollution Control Bureau. (This condition is federally enforceable for the purpose of synthetic minor status.)

9. By November 15 of each year, the owner or operator shall submit a written report notifying the Director of the Chattanooga-Hamilton County Air Pollution Control Bureau of the preceding 12-month period emissions for the following: VOC emissions from metal surface coatings, VOC emissions from cleaning solvents, and combined HAP emissions and single HAP emissions from all operations. (This condition is federally enforceable for the purpose of synthetic minor status.)

10. If this source operates, or fails to operate, in such a manner as to cause the emission of air pollutants in excess of any emission standard contained in these special conditions, the owner or operator shall promptly notify the Director, the Chattanooga-Hamilton County Air Pollution Control Bureau, in accordance with Section 4-12(e) of the Ordinance. Prompt notification shall mean an initial telephone report to the Director within 24 hours after the onset of the excess emissions, followed up by a written report submitted to the Director within 7 days after the onset of the excess emissions. (This condition is federally enforceable for the purpose of synthetic minor status.)

11. Metal Systems and the Chattanooga-Hamilton County Air Pollution Control Bureau mutually agree to reopen this federally enforceable certificate of operation upon promulgation of any new federal requirement that would be applicable to this source if the effective date of the requirement is prior to the expiration date of this certificate. (This condition is federally enforceable for the purpose of synthetic minor status.)

Federally Enforceable Certificate of Operation No. 1070-40200101-03C

The owner and operator of this source shall adhere to the following terms and limitations of this federally enforceable certificate of operation throughout its term. Any violation of the following terms and conditions may lead to enforcement action by the Chattanooga-Hamilton County Air Pollution Control Bureau or Board or by the U.S. Environmental Protection Agency or may subject the source to a citizen suit.

1. Volatile organic compound (VOC) emissions from metal surface coatings used by Metal Systems shall not exceed 24.99 tons per rolling 12-month period. Metal Systems has requested this limitation to remain below the applicability threshold of Rule 25.21 of the Chattanooga Air Pollution Control Ordinance. (This condition is federally enforceable for the purpose of synthetic minor status.)

2. Coating usage at this facility shall not exceed 910 gallons in any consecutive 30-day period. (This condition is federally enforceable for the purpose of synthetic minor status.)

3. The maximum VOC content of the coatings used at this facility shall not exceed 4.5 pounds per gallon as applied. (This condition is federally enforceable for the purpose of synthetic minor status.)

4. Hazardous Air Pollutant (HAP) emissions from all operations at Metal Systems shall be less than 5 tons per rolling 12-month period for any single HAP and less than 10 tons per rolling 12-month period for any combination of HAPs. Metal Systems has requested this limitation in order to remain below the thresholds of Part 70 permitting. (This condition is federally enforceable for the purpose of synthetic minor status.)

5. The owner or operator shall maintain a daily log of all HAP-containing materials and all VOC-containing materials used at Metal Systems. This log shall contain, at a minimum, the type and quantity of each material used, the pounds of each individual HAP used, the pounds of combined HAPs used, the pounds of VOCs used, and the initials of the operator. The log shall also contain the total combined HAP emissions, the total individual HAP emissions, and the total VOC emissions for the previous 12-month period. This log shall be maintained for a period of two years following the date of entry and shall be available for inspection by Bureau representatives upon request during normal business hours. (This condition is federally enforceable for the purpose of synthetic minor status.)

6. The owner or operator shall maintain usage and emissions documentation including purchase orders, invoices, and material safety data sheets for all HAP-containing materials and VOC-containing materials used. The documentation shall be maintained for a period of two years following each usage date and shall be available for inspection by Bureau representatives upon request during normal business hours. (This condition is federally enforceable for the purpose of synthetic minor status.)

7. All coating operations at Metal Systems shall be performed using high volume, low pressure (HVLP) spray guns or equivalent as approved by the Director, Chattanooga-Hamilton County Air Pollution Control Bureau. This limitation is Best Available Control Technology (BACT) as determined by the Director, Chattanooga-Hamilton County Air Pollution Control Bureau. (This condition is federally enforceable for the purpose of synthetic minor status.)

8. All spray gun cleaning at Metal Systems shall be performed using a closed loop solvent recycling system or equivalent as approved by the Director, Chattanooga-Hamilton County Air Pollution Control Bureau. This limitation is Best Available Control Technology (BACT) as determined by the Director, Chattanooga-Hamilton County Air Pollution Control Bureau. (This condition is federally enforceable for the purpose of synthetic minor status.)

9. By November 15 of each year, the owner or operator shall submit a written report notifying the Director of the Chattanooga-Hamilton County Air Pollution Control Bureau of the preceding 12-month period emissions for the following: VOC emissions from metal surface coatings, VOC emissions from cleaning solvents, and combined HAP emissions and single HAP emissions from all operations. (This condition is federally enforceable for the purpose of synthetic minor status.)

10. If this source operates, or fails to operate, in such a manner as to cause the emission of air pollutants in excess of any emission standard contained in these special conditions, the owner or operator shall promptly notify the Director, the Chattanooga-Hamilton County Air Pollution Control Bureau, in accordance with Section 4-12(e) of the Ordinance. Prompt notification shall mean an initial telephone report to the Director within 24 hours after the onset of the excess emissions, followed up by a written report submitted to the Director within 7 days after the onset of the excess emissions. (This condition is federally enforceable for the purpose of synthetic minor status.)

11. Metal Systems and the Chattanooga-Hamilton County Air Pollution Control Bureau mutually agree to reopen this federally enforceable certificate of operation upon promulgation of any new federal requirement that would be applicable to this source if the effective date of the requirement is prior to the expiration date of this certificate. (This condition is federally enforceable for the purpose of synthetic minor status.)

FURTHER ORDERED the special conditions previously imposed upon Certificate of Operation Nos. 1070-40200101-01C, 1070-40200101-02C, and 1070-40200101-03C numbered 2 through 10 be, and hereby are rescinded.

ENTER this 5th day of April, 1999.

THE CHATTANOOGA-HAMILTON COUNTY
AIR POLLUTION CONTROL BOARD

By: Stephen E. Meyer
Stephen E. Meyer, Chairman

AGREED TO:

For: Metal Systems, Inc.

Larry A Richardson EXEC VICE PRESIDENT
By: FOR Jim Steffner
Jim Steffner, President
Metal Systems, Inc.
1919 Polymer Drive
Chattanooga, TN 37421

For the Chattanooga-Hamilton County
Air Pollution Control Bureau

By: _____

Robert Colby, Director
Chattanooga-Hamilton County
Air Pollution Control Bureau
3511 Rossville Boulevard
Chattanooga, TN 37407

TENNESSEE DEPARTMENT OF CONSERVATION
NASHVILLE, TENNESSEE 37243-0438
701 Broadway
Fourth Floor, Customs House
Nashville, TN 37247-3530

FEB 1 9 1991

CERTIFIED MAIL #307 583 548
RETURN RECEIPT REQUESTED

Mr. Bruce Miller
Air Programs Branch
Air, Pesticides & Toxics Management
US EPA, Region IV
345 Courtland Street
Atlanta, GA 30365

RE: State Implementation Plan Revision
Photochemical Oxidant (Ozone) Nonattainment Areas
Rutherford County
Alternate Emission Standard for Nissan Motor Manufacturing Corporation, USA

Dear Mr. Miller:

This is an official submittal of a State Implementation Plan (SIP) revision for the Rutherford County portion of the middle Tennessee ozone nonattainment area consisting of an Alternate Emission Standard for Nissan Motor Manufacturing Corporation, USA, Smyrna, Tennessee. This SIP revision was approved by the Tennessee Air Pollution Control Board on January 16, 1991. This revision was subjected to public hearing and a copy of the hearing record is available at the Tennessee Division of Air Pollution Control office in Nashville.

This SIP revision was taken to the Board after extended negotiations between EPA, Nissan and the State led to the resolution of differences over the originally issued certificate of Alternate Control and incorporated Alternate Emission Standard permits. The permits approved by the Board reflect Nissan requests made to the agency for clarifications of the originally issued Alternate Emission Standard permits.

Should you have any questions concerning this official SIP submittal please contact me or John W. Walton of my staff at 615-741-3931.

Sincerely,

Harold E. Hodges

Harold E. Hodges, P.E.
Technical Secretary
Tennessee Air Pollution Control Board

HEH/JWW/kc

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF ENVIRONMENT
DIVISION OF AIR POLLUTION CONTROL

IN THE MATTER OF:

REVISION OF THE STATE IMPLEMENTATION PLAN SECTION 2.12.3 PHOTOCHEMICAL OXIDANT NONATTAINMENT AREAS

BY THE ADDITION OF 2.12.3. K ALTERNATE EMISSION STANDARDS AND 2.12.3.K.2. RUTHERFORD COUNTY

Order No. _____

BOARD ORDER

The Board hereby adopts an amendment to the State Implementation Plan by adding 2.12.3.K Alternate Emission Standards. The Board hereby adds 2.12.3.K.2. Rutherford County to the Plan also. Included in this Rutherford County addition is the Certificate of Alternate Control for Volatile Organic Compound Emissions issued to Nissan Motor Manufacturing Corporation, U.S.A. and incorporated permits referenced therein.

Approved by the following members of the Air Pollution Control Board of the State of Tennessee and entered on this 16th day of January 1991.

John D. Sewell
Charles W. Brown

5. The VOC compliance status of surface coating operations (Topcoat Color Line #1 with Booth #4, Topcoat Color Line #2 with Booth #5, and Topcoat Line #3 with Booth #6) at Nissan Motor Manufacturing Corporation with VOC emission standards will be determined together and not separately.

6. The maximum usage, maximum VOC content and Volatile Organic Compound (VOC) emission rates for this source shall not exceed the following:

Material	Maximum Usage Gallons per Month	Maximum Monthly Avg. #/Gal	Maximum Monthly # VOC	Tons of VOC Emitted per Calendar Year
Topcoat operations	45,688	4.34	250,920.0	993.43
Wash Solvent	6,311	8.34		

In the event that any usage limitation is exceeded, the following formula will be used to calculate actual #'s of VOC's emitted:

#VOC/month = GT x VOCt + Gws x VOCws

GT = actual gallons of topcoat used
VOCt = actual average VOC content of topcoats
Gws = actual gallons of wash solvent used
VOCws = actual wash solvent VOC used

7. The discharge of more than 250,920.0 # VOC/month and/or 993.43 tons VOC/year from the surface coating operations using the formula in Condition 6 shall constitute an emission standard violation. If the maximum monthly average pounds per gallon for topcoat operations (4.34) or wash solvent (8.34) is exceeded then that shall constitute an emissions standard violation.

8. Irrespective of the allowable emissions from Condition 6 above, the topcoat operations shall not exceed 1.47 Kg VOC/liter of solids applied (excluding wash solvent). Compliance is determined by utilizing provisions set forth in 40 CFR 60.393 (48FR85415, December 24, 1980).

9. Particulate matter emitted from this source shall not exceed 1.633 #/hr.

10. The issuance of this permit does not exempt the permittee from any requirements of the Environmental Protection Agency pertaining to the emissions from the operation of this source.

(continued on the next page)

TENNESSEE AIR POLLUTION CONTROL BOARD
NASHVILLE, TENNESSEE 37219-5403

OPERATING PERMIT Issued Pursuant to Tennessee Air Quality Act

Date Issued: July 30, 1990 (Revised January 2 and March 22, 1991)
Permit Number: 029539P

Date Expires: August 1, 1992

Issued To:

Nissan Motor Manufacturing Corporation, USA

Installation Address:

Nissan Drive
Smyrna

Installation Description:

Surface Coating Operation
Topcoat Color Line #2
Booth #5, Water Wash Control (Electrostatic)
Oven #6

Emission Source Reference No:

75-0155-03

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. This permit does not cover any air contaminant source that does not conform to the conditions of this permit and the information given in the approved application dated May 20, 1985. This includes compliance with the following operating parameters:

   Production capacity for this source shall not exceed 67 units per hour on a daily average.

2. The permittee shall apply for permit renewal sixty (60) days prior to the expiration of this permit.

3. Visible emissions shall not exceed 20% opacity as specified in Rule 1200-3-5-.01 of the Tennessee Air Pollution Control Regulations (aggregate count). Visible emissions from stacks will be determined by Tennessee Visible Emission Evaluation Method 2, as adopted by the Tennessee Air Pollution Control Board on August 24, 1984.

4. The owner or operator shall comply with the current reporting requirements specified in 40 CFR 60.395.

(continued on the next page)

Harold E. Hodges

TECHNICAL SECRETARY

F4041087

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 OR FILE AT INSTALLATION ADDRESS

PH-2381
APC Rev. 1/7

11. A monthly log of the gallons of coatings used and Kg of VOC per liter of coatings used must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. This log must be retained for a period of not less than two years. The log shall be maintained in the attached format. This log is in addition to that required in Condition 4 above.

12. A detailed analysis of the pounds of VOC per gallon for the materials listed in condition 6, utilizing EPA Method 24, shall be provided to the Technical Secretary on an annual basis for verification that the VOC content has not exceeded the specifications in Condition 6. A one hour bake time shall be used on all these Method 4 analyses.

13. By January 1, 1993, the tons of VOC emitted per calendar year (i.e. 1993), in condition 6, shall not exceed 926.99. The discharge of more than 926.99 tons VOC/year after this date shall constitute an emission standard violation.

14. By January 1, 1994, the tons of VOC emitted per calendar year (i.e. 1994 and thereafter) in condition 6, shall not exceed 748.99. The discharge of more than 748.99 tons VOC/year after this date shall constitute an emission standard violation.

5. The VOC compliance status of surface coating operations (Topcoat Color Line #1 with Booth #4, Topcoat Color Line #2 with Booth #5, and Topcoat Line #3 with Booth #6) at Nissan Motor Manufacturing Corporation with VOC emission standards will be determined together and not separately.

6. The maximum usage, maximum VOC content and Volatile Organic Compound (VOC) emission rates for this source shall not exceed the following:

Material	Maximum Usage Gallons per Month	Maximum Monthly Avg. #/Gal	Maximum Monthly # VOC	Tons of VOC Emitted per Calendar Year
Topcoat operations	45,688	4.34	250,920.0	993.43
Wash Solvent	6,311	8.34		

In the event that any usage limitation is exceeded, the following formula will be used to calculate actual #'s of VOC's emitted:

#VOC/month = GT x VOCt + Gws x VOCws

GT = actual gallons of topcoat used
VOCt = actual average VOC content of topcoats
Gws = actual gallons of wash solvent used
VOCws = actual wash solvent VOC content

7. The discharge of more than 250,920.0 # VOC/month and/or 993.43 tons VOC/year from the surface coating operations using the formula in Condition 6 shall constitute an emission standard violation. If the maximum monthly average pounds per gallon for topcoat operations (4.34) or wash solvent (8.34) is exceeded then that shall constitute an emissions standard violation.

8. Irrespective of the allowable emissions from Condition 6 above, the topcoat operations shall not exceed 1.47 Kg VOC/liter of solids applied (excluding wash solvent). Compliance is determined by utilizing provisions set forth in 40 CFR 60.393 (45FR85415, December 24, 1980).

9. Particulate matter emitted from this source shall not exceed 0.091 #/hr.

10. The issuance of this permit does not exempt the permittee from any requirements of the Environmental Protection Agency pertaining to the emissions from the operation of this source.

(continued on the next page)

TENNESSEE AIR POLLUTION CONTROL BOARD
NASHVILLE, TENNESSEE 37219-5403

OPERATING PERMIT Issued Pursuant to Tennessee Air Quality Act

Date Issued: July 30, 1990 (Revised January 2 and March 22, 1991)
Permit Number: 029541P

Date Expires: August 1, 1992

Issued To:

Nissan Motor Manufacturing Corporation, USA

Installation Address:

Nissan Drive
Smyrna

Installation Description:

Primer Surfacer Coating
Wax, Booth #3 with
Water Wash, and Oven
#4 with Incinerator

Emission Source Reference No:

75-0155-05

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. This permit does not cover any air contaminant source that does not conform to the conditions of this permit and the information given in the approved application. This includes compliance with the following operating parameters:

   Production capacity for this source shall not exceed 67 units/hour on a daily average.

2. Particulate matter emitted from this source shall not exceed 1.773 #/hr.

3. Natural gas and liquified petroleum gas (LPG) only shall be used as fuel(s) for this source.

4. Visible emissions shall not exceed 20% opacity as specified in Rule 1200-3-5.0 of the Tennessee Air Pollution Regulations (aggregate count). Visible emission from stacks will be determined by Tennessee Visible Emission Evaluation Method as adopted by the Tennessee Air Pollution Control Board on August 24, 1984.

(continued on the next page)

Harold E. Hodges

TECHNICAL SECRETARY F4011087

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 OR FILE AT INSTALLATION ADDRESS

PH-2381
APC Rev.

10. Compliance is determined by utilizing provisions set forth in 40 CFR 60.393 (45FR85415, December 24, 1980).

    Compliance with the VOC emission limitation established by Conditions 5 and 7 of this permit shall be determined by use of EPA Reference Method 24 as published in the Federal Register, Volume 45, Number 194, Friday, October 3, 1980.

11. Sixty (60) days prior to the expiration of this permit, permittee shall apply for permit renewal.

12. The issuance of this permit does not exempt the permittee from any requirements of the Environmental Protection Agency pertaining to the emissions from the operation of this source.

13. By January 1, 1994, the tons of VOC emitted per calendar year (i.e. 1994 and thereafter), in condition 5, shall not exceed 650.62. The discharge of more than 650.62 tons VOC/year after this date shall constitute an emission standard violation.

In the event that any usage limitation is exceeded, the following formula will be used to calculate actual #'s of VOC's emitted:

VOC/month = Gpvc x VOCpvc + Gst x VOCst

Gpvc = actual gallons of pvc undercoat used
VOCpvc = actual pvc undercoat VOC content
Gst = actual gallons of stoneguard used
VOCwo = actual stoneguard VOC content

5. The discharge of more than 41,444.0 # VOC/month and/or 80.62 tons VOC/year from this source (using the formula in Condition 4) shall constitute an emission standard violation. If the maximum monthly average pounds per gallon for PVC undercoat (0.75) or stoneguard (4.17) is exceeded then that shall constitute an emissions standard violation.

6. Visible emissions shall not exceed 20% opacity as specified in Rule 1200-3-5-.01 of the Tennessee Air Pollution Control Regulations (aggregate count). Visible emissions from stacks will be determined by Tennessee Visible Emission Evaluation Method 2 as adopted by the Tennessee Air Pollution Control Board on August 24, 1984.

7. The issuance of this permit does not exempt the permittee from any requirements of the Environmental Protection Agency pertaining to the emissions from the operation of this source.

8. A monthly log of the gallons of coatings used and Kg VOC per liter of coatings used must be maintained at the source and kept available for inspection by the Technical Secretary or his representative. This log must be maintained for a period of not less than two years. The log shall be maintained in the attached format.

9. A detailed analysis of the Kg of VOC per liter for the materials listed in condition 4, utilizing EPA Method 24, shall be provided to the Technical Secretary on an annual basis for verification that the VOC content has not exceeded the specifications in condition 4. A one hour bake time shall be used on all these Method 24 analyses.

10. The permittee shall apply for permit renewal sixty (60) days prior to the expiration of this permit.

Calculation shall be as follows:

Gallons/month x VOC Content in #/gal = # VOC/month

(c) VOC emissions to the atmosphere from the Gasoline Fill shall be determined by utilization of the EPA Emission Factor contained in AP-42, Fourth Edition, September 1985.

The following formula will determine compliance with the emission limit:

Tons VOC/year = a + b + c

4. The discharge of more than 5,387 # VOC/month or 24.33 tons VOC/year from this source using the formula in Condition 3 shall constitute an emission standard violation.

5. Visible emissions shall not exceed 20% opacity as specified in Rule 1200-3-5-.01 of the Tennessee Air Pollution Control Regulations (aggregate count). Visible emissions from stacks will be determined by Tennessee Visible Emission Evaluation Method 2 as adopted by the Tennessee Air Pollution Control Board on August 24, 1984.

6. The issuance of this permit does not exempt the permittee from any requirements of the Environmental Protection Agency pertaining to the emissions from the operation of this source.

7. A monthly log of the gallons of edgecoat wax, interior sealer, exterior sealer and solvent wiping material must be maintained at the source and kept available for inspection by the Technical Secretary or his representative. This log must be maintained for a period of not less than two years. The log shall be maintained in the attached format.

8. A detailed analysis of the pounds of VOC per gallon for the materials listed in condition 3b, utilizing EPA Method 24, shall be provided to the Technical Secretary on an annual basis for utilization in the VOC calculation in condition 3(c). A one hour bake time shall be used on all these Method 24 analyses.

9. A monthly log of gasoline received and dispensed shall be maintained at the source and kept available for inspection by the Technical Secretary or his representative. This log must be maintained for a period of not less than two years. The log shall be maintained in the attached format.

10. The permittee shall apply for permit renewal sixty (60) days prior to the expiration of this permit,

The maximum monthly # VOC of 74,674.0 will not change with the addition of Protective Wax to the above material listing. The actual usage must be adjusted to not exceed this limit by use of the following formula:

#VOC/month = Gew x VOCew + Gwo x VOCwo + Gbw x VOCbw + Gpw x VOCpw

Gew = actual gallons of engine wax used
VOCew = actual engine wax VOC content
Gwo = actual gallons of wax oil used
VOCwo = actual wax oil VOC content
Gbw = actual gallons of bit wax used
VOCbw = actual bit wax VOC content
Gpw = actual gallons of protective wax used
VOCpw = actual protective wax VOC content

4. The discharge of more than 74,674.0 # VOC/month and/or 230.44 tons VOC/year from this source (using the formula in condition 3) shall constitute an emission standard violation. If the maximum monthly average pounds per gallon of bit wax (3.7), wax oil (3.34), cavity wax (3.25) or protective wax (0.85) is exceeded then that shall constitute an emissions standard violation

5. The discharge of more than 39.9 tons VOC/year (using the protective wax portion of the formula in condition 3) shall constitute an emission standard violation.

6. Visible emissions shall not exceed 20% opacity as specified in Rule 1200-3-5-.01 of the Tennessee Air Pollution Control Regulations (aggregate count). Visible emissions from stacks will be determined by Tennessee Visible Emission Evaluation Method 2 as adopted by the Tennessee Air Pollution Control Board on August 24, 1984.

7. The issuance of this permit does not exempt the permittee from any requirements of the Environmental Protection Agency pertaining to the emissions from the operation of this source.

8. A monthly log of the gallons of coatings used and Kg VOC per liter of coatings used must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. This log must be retained for a period of not less than two years. The log shall be maintained in the attached format.

(continued on the next page)

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: May 31, 1996

Permit Number: 045022F

Date Expires: November 1, 2000

Issued To:
Midwestern Gas Transmission Company
Compressor Station 2101

Installation Address:
220 TGT Road
Portland

Installation Description:
3 Ingersoll Rand KVS-412 (2000 HP each)
1 Ingersoll Rand KVT-512 (3000 HP)
Cooper-Bessemer 8V-250 (2,700 HP)
Reciprocating Engines

Emission Source Reference No.
83-0014-01

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.

TIONS:

1. The agreement letter that was utilized in the preparation of this permit is dated September 30, 1992 and signed by D. T. Ellis, Vice President, Environmental Health and Safety of the permitted facility on October 8, 1992. Notification has been made to the Technical Secretary that Mr. Christian R. Holmes, IV is now serving in this capacity. If this person terminates his/her employment or is reassigned different duties such that he/she 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.

(continued on the next page)

John W. Walton

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

~~The emission rates for the engines at this source shall not exceed the following:~~

~~ENGINES~~	~~TSP (lbs/hr)~~	~~SO_2 (lbs/hr)~~
~~3 KVS-412~~	~~0.09 each~~	~~0.45 each~~
~~1 KVT-512~~	~~0.11~~	~~0.56~~
~~1 8V-250~~	~~0.11~~	~~0.54~~

~~3. Visible emissions from this source shall not exceed 20 percent or greater opacity as determined by EPA Method 9, as published in the Federal Register, Volume 39, Number 219 on November 12, 1974. (6 minute average)~~

4. The following information on this permit unit and other nitrogen oxides (NO_x) emitting permit units shall be supplied to the Technical Secretary in accordance with Paragraph 1200-3-27-.02(6):

   The owner or operator of any facility in Davidson, Rutherford, Shelby, Sumner, Williamson, or Wilson County which has actual emissions from stationary sources of twenty-five (25) tons or more of nitrogen oxides during a calendar year shall report to the Technical Secretary information and data concerning these emissions and VOC emissions. This information and data shall be in the form prescribed by the Technical Secretary, and shall be submitted before March 31 of the year following the calendar year for which the information and data is reported. The first report shall be for the 1993 calendar year, and shall be submitted before March 31, 1994. Each report shall be certified by an official of the company. Records must be kept by the facility, and maintained for a period of three years, documenting the information and data in each report.

5. Plant wide fuel use shall be reported to the Technical Secretary by February 1 for the previous calendar year.

~~Compliance with the particulate emission standards shall be determined from condition #3, or, if deemed necessary, from actual emissions measurement as prescribed by the Technical Secretary.~~

~~7. Compliance with the sulfur dioxide emission standards shall be determined from condition # 8, or, if deemed necessary, from actual emissions measurement as prescribed by the Technical Secretary.~~

8. Natural gas only shall be used as fuel for this source.

9. This permit supersedes any previous operating permits for this source.

8. 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 1200-3-9-.02(3).

9. Clean-burn retrofit shall be utilized on the Ingersoll-Rand KVS-412 Engine 1A and the Cooper Bessemer 8V-250 Engine 5A. This requirement has been established per Subparagraph 1200-3-27-.03(1)(a) of the Tennessee Air Pollution Control Regulations and the NO_x RACT Plan dated February 21, 1995 submitted to this Division by Tenneco Gas. The NO_x emission rates for these two engines shall not exceed the following:

Engine Identification	Emission Rate grams/hp-hour
Engine 1A (Ingersoll-Rand KVS-412)	18.01
Engine 5A (Cooper Bessemer 8V-250)	8.55

10. Maintenance records, records of natural gas usage, and records of operation hours for this source shall be kept onsite and shall be made available to the Technical Secretary or his representative for a period of not less than three years.

(END OF CONDITIONS)

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: May 31, 1996

Permit Number: 045025F

Date Expires: November 1, 2000

Issued To:

Tennessee Gas Pipeline

Installation Address:

220 TGT Road (Station 87)
Portland

Installation Description:

33 Cooper-Bessemer Two-Cycle Reciprocating Engines for Pumping with a Total of 49,700 HP
7 Ingersoll-Rand Four-Cycle Auxiliary Generators with a Total of 2,704 HP

Emission Source Reference No.

83-0008-01

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 agreement letter that was utilized in the preparation of this permit is dated September 30, 1992 and signed by D. T. Ellis, Vice President, Environmental & Safety of the permitted facility. Notification has been made to the Technical Secretary that Mr. Christian R. Holmes, IV is now serving in this capacity. If this person terminates his/her employment or is reassigned different duties such that he/she 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.

(continued on the next page)

John W. Walton

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. ~~Visible emissions from this source shall not exceed 20 percent or greater opacity as determined by EPA Method 9, as published in the Federal Register, Volume 39, Number 219 on November 12, 1974. (6 minute average)~~

Maintenance records, records of natural gas usage, and records of operating hours for this source shall be kept onsite and shall be made available to the Technical Secretary for a period of not less than three years.

4. ~~Particulate matter emitted from this source shall not exceed 100.7 pounds per hour. If deemed necessary, compliance with this requirement may be determined from actual emissions measurement as prescribed by the Technical Secretary~~.

5. ~~Sulfur dioxide emitted from this source shall not exceed 5 pounds per million Btu of heat input. If deemed necessary, compliance with this requirement may be determined from actual emissions measurement as prescribed by the Technical Secretary~~.

6. 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 1200-3-9-.02(3).

7. The following information on this permit unit and other VOC or nitrogen oxides (NO_x) emitting permit units shall be supplied to the Technical Secretary in accordance with Paragraph 1200-3-27-.02(6):

> The owner or operator of any facility in Davidson, Rutherford, Shelby, Sumner, Williamson, or Wilson County which has actual emissions from stationary sources of twenty-five (25) tons or more of nitrogen oxides (NO_x) during a calendar year shall report to the Technical Secretary information and data concerning these emissions and VOC emissions. This information and data shall be in the form prescribed by the Technical Secretary, and shall be submitted before March 31 of the year following the calendar year for which the information and data is reported. The first report shall be for the 1993 calendar year, and shall be submitted before March 31, 1994. Each report shall be certified by an oficial of the company. Records must be kept by the facility, and maintained for a period of three years, documenting the information and data in each report.

8. Plant wide fuel use shall be reported to the Technical Secretary by February 1 for the previous calendar year.

9. Engine number three in compressor building D (a Cooper Bessemer 16V-250 rated at 5500 horsepower) shall not be operated without the installation of a clean-burn retrofit modification. The NO_x emission rate for this engine shall not exceed 3.6 grams per horsepower-hour. (Note)

10. Parametric controls shall be utilized on engines 1 and 2 (Cooper Bessemer GMWC-10 engines rated at 3400 horsepower each) located in compressor building D. The NO_x emission rate for each of these engines shall not exceed 37.3 grams per horsepower-hour. (Note)

11. Non-selective catalytic reduction shall be utilized on auxiliary engines 2 and 3 located in building C. The NO_x emission rate for each of these engines shall not exceed 2.8 grams per horsepower-hour. (Note)

(END OF CONDITIONS)

Note: Conditions 8, 9, and 10 have been established per Rule 1200-3-27-.03(1)(a) of the Tennessee Air Pollution Control Regulations and the NO_x RACT Plan dated February 21, 1995 submitted to this Division by Tenneco Gas. The emission limitations are based upon information provided in the May 14, 1996 correspondence from Tenneco Energy.

40 CFR Part 52

[TN-173-9637a; FRL-5538-2]

Approval and Promulgation of Implementation Plans Tennessee: Approval of Source Specific Nitrogen Oxide Permits Into the Tennessee State Implementation Plan

AGENCY: Environmental Protection Agency (EPA).

ACTION: Direct final rule.

SUMMARY: In this action, EPA is approving two source specific permits into the Tennessee State Implementation Plan (SIP) submitted to EPA by Tennessee, through the Tennessee Department of Air Pollution Control (TDAPC) which limit nitrogen oxide (NO_X) emissions for certain engines at the Tenneco Energy Portland facility located in Sumner County, Tennessee. These permits are necessary because NO_X reductions from the Tenneco Energy Portland facility were used in calculating the NO_X emissions projections in the maintenance plan for the Middle Tennessee ozone nonattainment area. EPA is proposing approval of the ozone redesignation request in a separate action.

DATES: This final rule is effective September 23, 1996 unless adverse or critical comments are received by August 23, 1996. If the effective date is delayed, timely notice will be published in the **Federal Register**.

ADDRESSES: Written comments on this action should be addressed to William Denman at the Environmental Protection Agency, Region 4 Air Programs Branch, 345 Courtland Street, NE, Atlanta, Georgia 30365. Copies of documents relative to this action are available for public inspection during normal business hours at the following locations. The interested persons wanting to examine these documents should make an appointment with the appropriate office at least 24 hours before the visiting day. Reference file TN173-01-9637. The Region 4 office may have additional background documents not available at the other locations.

Air and Radiation Docket and Information Center (Air Docket 6102), U.S. Environmental Protection Agency, 401 M Street, SW., Washington, DC 20460.

Environmental Protection Agency, Region 4 Air Programs Branch, 345 Courtland Street, NE, Atlanta, Georgia 30365, William Denman, 404/347-3555 extension 4208.

Tennessee Department of Environment and Conservation, Division of Air Pollution Control, L & C Annex, 9th Floor, 401 Church Street, Nashville, Tennessee 37243-1531, 615/532-0554.

FOR FURTHER INFORMATION CONTACT: William Denman 404/347-3555 extension 4208.

SUPPLEMENTARY INFORMATION: On May 31, 1996, Tennessee, through the Tennessee Department of Air Pollution Control (TDAPC), submitted to EPA for incorporation into the SIP, two permits which limit nitrogen oxide (NO_X) emissions for certain engines at the Tenneco Energy Portland facility located in Sumner County, Tennessee. The permits contain requirements and emission limits for reciprocating engines and auxiliary generators which are used for the purpose of pumping natural gas.

The first permit (#045022F) was issued to the Midwestern Gas Transmission Company, Compressor Station 2101 which operates 3 Ingersoll Rand KVS-412 (2000 horsepower [hp]), 1 Ingersoll Rand KVT-512 (3000 hp), and 1 Cooper-Bessemer 8V-250 (2700 hp) reciprocating engines at the Portland facility. This operating permit contains a provision which requires clean-burn retrofit to be utilized on Ingersoll-Rand KVS-412 engine 1A and Cooper-Bessemer 8V-250 engine 5A. Engine 1A is required to have an emission rate not exceeding 18.01 grams per hp-hour and engine 5A is required to have an emission rate not exceeding 8.55 grams per hp-hour.

The second permit (#045025F) was issued to Tennessee Gas Pipeline which operates 33 Cooper-Bessemer two-cycle reciprocating engines with a total of 49,700 hp and 7 Ingersoll Rand four-cycle auxiliary generators with a total of 2,704 hp. This permit prohibits engine number three (Cooper-Bessemer 16V-250 rated at 550 hp) from operating without installing a clean-burn retrofit modification and limits the emission rate to not exceed 3.6 grams per hp-hour. Also, this permit requires that parametric controls be used on engines 1 and 2 (Cooper-Bessemer GMWC-10 rated at 3400 hp each) and limits the emission rate of these engines to 37.3 grams per hp-hour.

The NO_X controls and limits in these two permits must be approved into the Tennessee SIP prior to the approval of the Middle Tennessee ozone redesignation request because NO_X reductions from the Tenneco Energy Portland facility were used in calculating the NO_X emissions projections in the maintenance plan for the Middle Tennessee ozone nonattainment area.

These permits, which provide NO_X emission controls, are not being approved as meeting the NO_X Reasonably Available Control Technology (RACT) requirements of the Clean Air Act (CAA) because EPA is granting a NO_X RACT exemption for the Middle Tennessee ozone nonattainment area under 182(f) of the CAA in a separate action. If the Middle Tennessee ozone nonattainment area violates the ozone standard prior to the final approval of the ozone redesignation request, the NO_X RACT exemption will become void and all major NO_X sources located in the nonattainment area will be subject to the federal NO_X RACT requirements of the CAA.

Final Action

The EPA is approving the aforementioned permits into the Tennessee SIP because they are consistent with the CAA and EPA policy. This rule making is being published without a prior proposal for approval because the Agency views this as a noncontroversial amendment and anticipates no adverse comments. However, in a separate document in this **Federal Register** publication, the EPA is proposing to approve the SIP revision should adverse or critical comments be filed. This action will be effective September 23, 1996 unless, by August 23, 1996, adverse or critical comments are received.

If the EPA receives such comments, this action will be withdrawn before the effective date by publishing a subsequent document that will withdraw the final action. All public comments received will then be addressed in a subsequent final rule based on the separate proposed rule. The EPA will not institute a second comment period on this action. Any parties interested in commenting on this action should do so at this time. If no such comments are received, the public is advised that this action will be effective September 23, 1996.

Under section 307(b)(1) of the Clean Air Act (CAA), 42 U.S.C. 7607(b)(1), petitions for judicial review of this action must be filed in the United States Court of Appeals for the appropriate circuit by September 23, 1996. Filing a petition for reconsideration by the Administrator of this final rule does not affect the finality of this rule for purposes of judicial review nor does it extend the time within which a petition for judicial review may be filed, and shall not postpone the effectiveness of such rule or action. This action may not be challenged later in proceedings to enforce its requirements. (See section

TN159

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

MA

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

Date Issued: FEB 21 1998

Permit Number: 743652P

Date Expires: October 1, 1998

Issued To:
Marine Group
A Brunswick Co.

Installation Address:
6776 Old Nashville Highway
Murfreesboro

Installation Description:
Fiberglass Boat Manufacturing
with gelcoats, resins, painting,
foaming and R & D facility
Baghouse control

Emission Source Reference No.
75-0148-03
RACT

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 June 6, 1993 and October 10, 1995 and signed by Robert Beagle and Janice Stewart, respectively, successive Environmental Manager of the permitted facility. If this person terminates his/her employment or is reassigned different duties such that he/she 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.

(Continued on the next page)

Mgr. John W. Walton
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

NON TRANSFERABLE

RDA-1298

CN-0754 (Rev.9-92)

The maximum material usage rates for this source shall not exceed the following:

Materials Applied	Usage, Gallons/Month
Gelcoats	8,000
Resins	37,000
Clean-up Solvent	6,226
Miscellaneous Materials	313

3. Volatile organic compounds (VOC) emitted from this source shall not exceed the following:

Material Applied	Lb VOC/Gallon	Lb NON-VOC/Gallon
Gelcoats	0.78*	----
Resins	0.61**	----
Clean-up Solvent (Acetone)	6.6	----
Low Solvent Content Clean-up	0.6	----
Miscellaneous	4.4	7.6

Calculations of Styrene emission from Gelcoat & Resin:

*Gelcoat : (density)(48% VOC content max^{m})(A)
**Resin : (density)(37% VOC content max^{m})(A)

Where,
A = styrene emission rate, 18% for spray operation & 10% for hand lay up.

4. Particulate matter emitted from this source shall not exceed 0.02 grains per dry standard cubic foot (3.42 pounds per hour).

5. Visible emissions from this source shall not exceed 20 percent or greater opacity as determined by EPA Method 9, as published in the Federal Register, Volume 39, Number 219 on November 12, 1974. (6 minute average)

6. A log of the gelcoat, resin, acetone, low solvent clean-up material and miscellaneous material usage in a form that readily shows compliance with conditions 2, 3 and 7 must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. This log must be retained for a period of not less than four years.

7. The amount of acetone usage in the clean-up solvent shall not exceed 6,100 gallons per month.

The permittee is placed on notice that acetone shall be regulated as a Volatile Organic Compound (VOC) until such time as Rules 1200-3-9-.01 and 1200-3-18-.01 of the Tennessee Air Pollution Control Regulations are amended to include acetone as an exempt VOC. After that date, emissions of acetone will be regulated as non-VOC gaseous emissions under Rule 1200-3-7-.07.

8. Clean-up solvent shall be kept in self-closing containers.

9. All spent clean-up solvent (acetone) shall be collected and stored in closed, secure containers until it is recycled on-site or transferred to a disposal or recycling facility off-site.

All acetone clean-up stations shall consist of containers equipped with covers that are kept closed except when the station is in actual use.

11. Any waste resin or acetone must be disposed of in accordance with the "Regulations Governing Hazardous Waste Management in Tennessee."

12. Virgin acetone must be transported from the storage tank and distillate storage drum in self-closing containers.

13. Distilled acetone must be stored in sealed drums while awaiting transport to a clean-up station.

14. The as-supplied volatile organic compounds (VOC) content of the input materials listed in the approved application for use by this source shall be determined once as follows:

(a) Solvent-based Coatings--by using the procedures and analyses of:

(1) EPA Method 24 (one hour bake) (Part 1200-3-16-.01(5)(g)(24) of the Tennessee Air Pollution Control Regulations) or

These data may be obtained by laboratory analyses or from manufacturer or vendor certification stating the VOC content was determined by EPA Method 24 or EPA Method 24A.

(b) Water-based Coatings--by using manufacturer or vendor certification which explicitly list the VOC content by weight.

(c) Thinners/Cleaners/Solvents/Ancillary Materials--by using manufacturer or vendor certification which explicitly list the VOC content by weight.

The results of these determinations shall be submitted to the Technical Secretary within 180 days of the issuance date of this permit.

15. Should this source use materials not included in the submittal required by Condition 14 of this permit, the as-supplied VOC content of these materials shall be determined once as detailed in Condition 14 of this permit. The results of these determinations and appropriate manufacturer or vendor certification shall be submitted to the Technical Secretary within 90 days of the initial date of usage of these materials.

16. Sixty (60) days prior to the expiration of this permit, permittee shall apply for permit renewal.

17. The issuance of this combined construction and operating permit supersedes any previously issued construction & operating permits for this air contaminant source.

18. Reasonably Available Control Technology (RACT) for this source has been set as per Tennessee Air Pollution Control Regulations, 1200-3-18-.79(2)(c) and Air Pollution Control Board order no. 94-12 dated April 13, 1994 and as stated below:

1. Decks and Hulls Production:

a. In laminating process of the decks only non-atomizing techniques shall be used. These techniques include the use of airless or air-assisted airless spray guns, and techniques such as use of pressure fed rollers.

b. Airless or air-assisted airless spraying equipment shall be utilized where possible during the gelcoat application. However, during the application of polyflake gelcoats, air-atomized techniques may be used.

contd.

1. Decks and Hulls Production:

   c. In the laminating process of hulls, the dry glass reinforcement shall be placed into the molds by hand and catalyzed resins shall be applied to the dry glass using non-atomizing techniques such as pressure fed rollers, wet out and "chopper" guns or bucket and brush techniques.

   d. Mix(ed) gelcoats contain VOC's including styrene, Methyl Ethyl Ketone Peroxide (MEKP) and Methyl Methacrylate (MMA). The MEKP content of gelcoat shall not exceed 2 percent (%) by weight under normal operating conditions. A maximum of 2.5 percent MEKP may be used when necessary due to cold weather conditions.

   e. Styrene content of resins and gelcoat shall not exceed 37% and 48% by weight, respectively. The methyl methacrylate (MMA) content of gelcoat shall not exceed 10% by weight.

   f. Emissions of styrene may be determined quantitatively by using the factors 18% by weight for spray operations and 10% by weight for hand lay up operations unless alternative empirical factors can be established and are approved by the Technical Secretary.

   g. The styrene content of the gelcoat used for tooling purpose shall not exceed 50% by weight, and shall be utilized only during the construction and repair of molds.

2. Carpet Adhesive Application:

   Adhesive containing solvents which are Ozone depleting chemicals are being phased out of this operation because of the adverse environmental effect of release of these chemicals to the atmosphere. Because of feasibility, adhesives containing VOC may be used in this operation. The allowable VOC content is to be specified by the Technical Secretary. (The content is specified in condition 3. of this permit).

3. Miscellaneous:

   Total VOC emission from other VOC emitting operations which are subject to Rule 1200-3-18-.79 shall not be in excess of 3% of the total VOC emitted from all operations subject to this rule. Compliance with this requirement shall be on a calendar month basis.

(End of permit)

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

TN174

DSG

OPERATING PERMIT Issued Pursuant to Tennessee Air Quality Act

Date Issued: JUL 27 1995

Permit Number: 039845P

Date Expires: October 1, 1999

Issued To:
Stratos Boat, Inc.
D.B.A. Javelin Boats

Installation Address:
880 Butler Road
Murfreesboro

Installation Description:
Carpet Glue Application

Emission Source Reference No.
75-0172-04

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:

The application that was utilized in the preparation of this permit is dated December 7, 1988 and signed by Eric Uhtenwoldt, Environmentalist of the permitted facility. If this person terminates his employment or is reassigned different duties such that he 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. This permit does not cover any air contaminant source that does not conform to the conditions of this permit and the information given in the approved application.

(continued on the next page)

John W. Walter
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. Glue usage at this source shall not exceed 240 Gallons per Day for a maximum production of 60 Boats per Day.

Volatile Organic Compounds (VOC's) emitted from this source shall not exceed 1.2 Pounds per Gallon of glue applied.

4. Non-volatile organic compounds emitted from this source shall not exceed 6.0 Pounds per Gallon of Glue applied.

5. Visible emissions shall not exceed 20% opacity as specified in Rule 1200-3-5-.01 of the Tennessee Air Pollution Control Regulations (aggregate count). Visible emissions from stacks will be determined by Tennessee Visible Emission Evaluation Method 2 as adopted by the Tennessee Air Pollution Control Board on August 24, 1984.

6. A log of the daily carpet glue usage, VOC content, and non-VOC content must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. This log must be retained for a period of not less than two years.

7. Should proof of compliance with Condition 3 be required, EPA Method 24 outlined in the Federal Register, Vol. 45, No. 194, October 3, 1980 shall be used.

8. 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 1200-3-9-.02(3).

(END OF CONDITIONS)

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

TN174

OPERATING PERMIT Issued Pursuant to Tennessee Air Quality Act

Date Issued: MAY 3 1 1995

Permit Number:
044881P

Date Expires: October 1, 1999

Issued To:
Stratos Boat, Inc.
D.B.A. Javelin Boats

Installation Address:
880 Butler Road
Murfreesboro

Installation Description:
Gelcoat and Laminating
(16) Spray Booths PES GC-1 through GC-16
With Exhaust Trailers

Emission Source Reference No.
75-0172-02
LAER & RACT

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 September 5, 1989 and signed by Eric Uhtenwoldt, Environmentalist of the permitted facility. If this person terminates his employment or is reassigned different duties such that he 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. This permit does not cover any air contaminant source that does not conform to the conditions of this permit and the information given in the approved application.

(continued on the next page)

John W. Walton
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 maximum usage and Volatile Organic Compound (VOC) emission rates for this source shall not exceed the following:

Material	Gallons per Day	Pounds of VOC per Gallon
Gelcoat	462	0.70
Resin	3300	0.60
Acrylic Paint	10	2.00
Acetone	360	6.60
Emulsifier	45	0.70

3. Particulate matter emitted from this source shall not exceed 2.89 Pounds per Hour.

4. Operating time shall not exceed 4000 Hours per Year.

5. Visible emissions shall not exceed 20% opacity as specified in Rule 1200-3-5-.01 of the Tennessee Air Pollution Control Regulations (aggregate count). Visible emissions from stacks will be determined by Tennessee Visible Emission Evaluation Method 2 as adopted by the Tennessee Air Pollution Control Board on August 24, 1984.

6. A log of the operating time, material usage, and materials VOC content must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. This log must be retained for a period of not less than two years.

7. Should proof of compliance with Condition 2 be required, EPA Method 24 outlined in the Federal Register, Vol. 45, No. 194, October 3, 1980, and for gelcoat and resin, EPA Method 25 outlined in the Federal Register, Vol. 45, No. 194, October 3, 1980 shall be used.

8. Should proof of compliance with Condition 3 be required, EPA Method 5 outlined in the Federal Register, Vol. 42, No. 160, August 18, 1977, as amended shall be used.

9. The following provisions shall be observed for deck and hull production:

   a. In the laminating process of decks larger than 21 feet in length, only non-atomizing resin application techniques such as a flow coater or pressure feed roller shall be used to apply the catalyzed resin to wet the glass fibers and mold surfaces. In the laminating process of decks smaller than 21 feet in length, techniques such as airless or air-assisted airless spray guns, which include wet out and "chopper" guns, and pressure feed rollers and flow coaters shall be used.

   b. Only airless or air-assisted airless spraying equipment shall be used for the gelcoat application.

   c. In the laminating process of hulls, the dry glass reinforcement shall be placed into the molds by hand and catalyzed resin shall be applied to the dry glass by a non-atomizing resin application technique such as a flow coater or pressure feed roller.

   d. Mixed gelcoat may contain the VOC's styrene, methyl methacrylate (MMA), and methyl ethyl ketone peroxide (MEKP). The MEKP content of gelcoat shall not exceed 2% by weight under normal operating conditions. A maximum of 2.5% MEKP may be used when necessary due to cold weather conditions.

   e. The styrene content of the laminating resin shall not exceed 35% by weight. The combined styrene and methyl methacrylate (MMA) content of the pigmented gelcoat shall not exceed 47% by weight and of the metal flake clear gelcoat 53% by weight.

(Continued on Next Page)

(Condition 9 continued)

f. Emission of styrene shall be calculated based on 18% by weight for atomized spray operations and 10% by weight for hand lay up operations.

g. For tooling purposes only, the styrene content of gelcoat and resin shall not exceed 50% by weight.

h. Tooling gelcoat shall be used only for the purpose of building and repairing molds.

10. Total volatile organic compound (VOC emissions from other VOC emitting operations which are subject to Rule 1200-3-18-.79) shall not be in excess of 3 percent of the total VOC emitted from all operations subject to this Rule. Compliance with this requirement shall be on a calendar month basis.

11. This permit contains corrections in condition #9 notably e and f and supercedes permit # 039844P.

12. 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 1200-3-9-.02(3).

(END OF CONDITIONS)

TN175

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

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

Date Issued: MAY 31 1996

Permit Number: 045013P

Date Expires: December 1, 2000

Issued To:
Essex Group, Inc.

Installation Address:
120 Southeast Parkway Drive
Franklin

Installation Description:
4 Magnet Wire Coating Process Lines: Each Line Consisting of Annealing Furnace, Basecoat/Topcoat Enamel Application, Enamel Curing Ovens, Incinerator Control and Dri-Lube Application, PES 213-216

Emission Source Reference No.
94-0072-16
LAER
RACT

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:

The application that was utilized in the preparation of this permit is dated January 31, 1995 and signed by David L. Cummings, Plant Manager of the permitted facility. If this person terminates his/her employment or is reassigned different duties such that he/she 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.

(continued on the next page)

John W. Walton
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

The maximum monthly Volatile Organic Compounds(VOC) emission shall not exceed 3.27 tons/month, based on the material usages and their VOC content as given in the approved confidential file. After one year of operation, this monthly limit shall be based on a 12 month rolling average.

3. Total Volatile Organic Compounds (VOC) emitted from this source shall not exceed 39.24 tons/year.

4. The source shall be subject to the Control Device requirements in Rule 1200-3-18-.13(5) in the Tennessee Air Pollution Control Regulations for coating of magnet wire, the requirements of which are as follows:

(a) An owner or operator of a magnet wire coating line may comply by;

1. Installing & operating a capture system and a control device,

2. Daily determination of overall emission reduction efficiency needed to demonstrate compliance. The overall emission reduction needed is the lesser of the value calculated according to the procedure in TAPCD Rule 1200-3-18 or 95 percent; and

3. Demonstrating each day that overall emission reduction efficiency achieved is greater than or equal to the overall emission reduction efficiency required.

(b) An owner or operator of a magnet wire coating line shall ensure that:

1. A capture system & control device are operated at all times the line is in operation, and demonstrates compliance through the applicable coating analysis and capture system and control device efficiency determination methods specified in 1200-3-18., and

2. The control device is equipped with a temperature monitoring device, and the monitoring equipment is installed, calibrated, operated and maintained according to vendor's specifications at all times the control device is in use.

5. A log of the VOC emissions both in tons/month and tons/year based on recorded information and calculation of material usages, their weighted average VOC content, MSDS and control equipment capture and destruction efficiency, in a form that readily shows compliance with conditions 2, 3 & 4 must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. This log must be retained for a period of not less than three years.

6. a) Volatile organic compounds(VOC) content of the coating mixture(s) as applied shall be determined once unless the formulation is changed, using the procedures and analyses of EPA Method 24 (one hour bake) (Part 1200-3-16-.01(5)(g)24 of the Tennessee Air Pollution Control Regulations).

b) VOC content of the clean-up solvent shall be determined by using Material Safety Data Sheets (MSDS) or vendor or manufacturer formulation data which clearly list the VOC content by weight.

The results of these determinations shall be submitted to the Technical Secretary within 180 days of the start-up of the source.

7. Should this source use materials not included in the submittal required by condition 6 of this permit, the as applied VOC content of these materials shall be determined once as detailed in condition 5 of this permit. The results of these determinations along with current MSDS and/or other appropriate vendor information shall be submitted to the Technical Secretary within 90 days of the initial date of usage of these materials.

8. Particulate matter emitted from this source shall not exceed 0.02 grains/dry standard cubic foot (3.5 Lbs/hr).

(continued on the next page)

The source shall not be operated without the associated control device (thermal incinerator) with its rated efficiency as given in the confidential application. The average incinerator temperature(combustion chamber) shall be 1350 °F (as determined from previous test) during routine operation of the source.

10. The owner or operator shall monitor and record the incinerator temperature on a continuous basis. The temperature shall be measured in the combustion chamber. The temperature sensing device shall have an accuracy that is plus or minus 25 °F over its operating range. All data shall be kept on file for a period of at least three years and made available to the Technical Secretary or his representative upon request and as per TAPCD Rule 1200-3-18-.03(5).

11. Visible emissions from this source shall not exceed 20 percent or greater opacity as determined by EPA Method 9, as published in the Federal Register, Volume 39, Number 219 on November 12, 1974. (6 minute average)

12. Good housekeeping procedures shall include the following: minimizing the lube and enamel delivery system leaks, maintain all the clean-up rags stored in covered container prior to appropriate disposal.

13. Natural gas with Propane as backup only shall be used as fuel for the ovens.

14. The maximum heat input to all eight (8) ovens and incinerators shall not exceed eight (8) MMBtu/hour.

15. The enamel coating room/space (in this case the enclosed equipment) shall meet the following criteria to meet the requirements for a total enclosure for 100% VOC capture efficiency.

    (a) access openings remain closed during routine operations except for moving raw materials and product.

    (b) total area of all NDO is less than 5% of the surface area of the enclosure.

    (c) air flow through all natural draft openings (NDO) at least 200 feet per minute (fpm) with a verification of continuous flow into the enclosure (no verification is needed if flow into the enclosure is at least 500 fpm).

    (d) all NDO shall be at least four (4) equivalent opening diameters from both VOC emitting point and total enclosure exhaust point.

    (e) all VOC emissions must be captured and contained for discharge through the control device(incinerator).

(Continued on the next page)

Pursuant to Tennessee Air Pollution Control Board Order 94-14 dated April 13, 1994 Reasonably Available Control Technology (RACT) is stipulated for VOC emission control on lubricant application by the following conditions.

a. Lubricant shall be applied by wick applicator only.

b. The volatile organic compound content of the lubricant shall not exceed 3.87 pounds per Gallon, as applied and excluding water and exempt compounds (as defined in Rule 1200-3-18-.01).

c. In addition to satisfying the requirements of Paragraphs 1200-3-18-.03(1) and (3) of the Tennessee Air Pollution Control Regulations, records shall be maintained of the quantity of lubricant used per calendar month. Each record shall be kept for at least three years after the date the record is created, and shall be made available to the Technical Secretary upon request. See condition 5.

d. By March 31 of each year, a report shall be submitted to the Technical Secretary of results of research and development in reducing volatile organic compound (VOC) emissions from the lubricant application operation (such as reformulation of the lubricant, improvement in application efficiency, process changes to reduce or eliminate the need for lubricant application, and installation of emission control systems) and of reductions achieved by implementation of new emission reduction methods.

17. 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 1200-3-9-.02(3).

(END OF CONDITIONS)

TN175

TENNESSEE AIR POLLUTIC[illegible] CONTROL BOARD
DEPARTMENT OF ENVIRONM[illegible]NT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-1531

OPERATING PERMIT Issued Pursuant to Tennessee Air Quality Act

Date Issued: MAY 31 1996

Permit Number:
045012P

Date Expires: December 1, 2000

Issued To:
Essex Group, Inc.

Installation Address:
120 S.E. Parkway Drive
Franklin

Installation Description:
12 Magnet Wire Coating Process Lines: Each Line Consisting of Annealing Furnace, Basecoat/Topcoat Enamel Application, Enamel Curing Ovens, Incinerator Control and Dri-Lube Application, PES 301-312

Emission Source Reference No.
94-0072-06
LAER
RACT

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 confidential and dated May 9, 1990. All representations, agreement to terms and conditions and covenants made by the 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.

(continued on the next page)

John W. Walton
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

a. The volatile organic compound (VOC) content of the enamel, clean-up solvent, and Dri-Lube shall not exceed the amount specified in the confidential application of May 9, 1990.

b. The maximum usage rates of basecoat, topcoat, Dri-Lube and clean-up solvent shall not exceed the maximum usage rates for each category specified in the confidential letter of May 9, 1990.

c. Heat input capacity shall not exceed the amounts listed below:

Ovens (PES 301-312)	13.2 MMBTU/Hr total for all twelve ovens

3. Volatile Organic Compounds (VOC) emitted from each oven shall not exceed 0.32 Pounds VOC per Gallon of Basecoat and topcoat enamel as controlled, daily average over a calendar month.

4. Volatile Organic Compounds (VOC) emitted from this source shall not exceed 4.49 Pounds VOC per Gallon of clean-up solvent.

5. Volatile Organic Compounds (VOC) emitted from this source shall not exceed 5.87 Pounds VOC per Gallon of dri-lube.

6. Particulate matter emitted from each oven shall not exceed 0.02 Grains per Dry Standard Cubic Foot (1.49 Pounds per Hour for all twelve ovens).

7. This permit is valid only for natural gas and liquid propane.

8. Visible emissions from this source shall not exceed 20 percent or greater opacity as determined by EPA Method 9, as published in the Federal Register, Volume 39, Number 219 on November 12, 1974. (6 minute average)

9. This permit is valid only when the afterburner is in use.

10. A log of the enamel, dri-lube, solvent usage and the material safety data sheets must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. This log must be retained for a period of not less than three years.

11. Should proof of compliance with condition 2 a be required, EPA Method 24 shall be used.

12. Should proof of compliance with condition 3 be required, EPA Method 25 shall be used.

13. The source owner or operator will continually seek new technology to include (but not be limited to): (1) selection and use of non-VOC dri-lubes for products where they can be used; (2) selection and use of higher solids percent enamels and water-base coatings when technically acceptable and available to the magnetic wire coating industry. Status reports will be submitted annually to the Technical Secretary addressing each emerging technology. The initial reports will be due one year after the end of the calendar year 1992 and each year thereafter.

14. Good housekeeping procedures shall include the following: minimizing the lube and enamel delivery system leaks; maintain all the clean-up rags stored in covered containers prior to appropriate disposal; and reusable totes for enamel and dri-lube.

(Continued on the next page)

15. Pursuant to Tennessee Air Pollution Control Board Order 94-14 dated April 13, 1994 Reasonably Available Control Technology (RACT) is stipulated for VOC emission control on lubricant application by the following conditions.

    a. Lubricant shall be applied by wick applicator only.

    b. The volatile organic compound content of the lubricant shall not exceed 5.87 pounds per Gallon, as applied and excluding water and exempt compounds (as defined in Rule 1200-3-18-.01). See condition 5.

    c. In addition to satisfying the requirements of Paragraphs 1200-3-18-.03(1) and (3) of the Tennessee Air Pollution Control Regulations, records shall be maintained of the quantity of lubricant used per calendar month. Each record shall be kept for at least three years after the date the record is created, and shall be made available to the Technical Secretary upon request. See condition 10.

    d. By March 31 of each year, a report shall be submitted to the Technical Secretary of results of research and development in reducing volatile organic compound (VOC) emissions from the lubricant application operation (such as reformulation of the lubricant, improvement in application efficiency, process changes to reduce or eliminate the need for lubricant application, and installation of emission control systems) and of reductions achieved by implementation of new emission reduction methods. See condition 13.

16. 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 1200-3-9-.02(3).

(END OF CONDITIONS)

TN175

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: MAY 31 1995

Permit Number:
045011P

Date Expires: December 1, 2000

Issued To:
Essex Group, Inc.

Installation Address:
120 S.E. Parkway Drive
Franklin

Installation Description:
12 Magnet Wire Coating Process Lines: Each Line Consisting of Annealing Furnace, Basecoat/Topcoat Enamel Application, Enamel Curing Ovens, Incinerator Control and Dri-Lube Application, PES 201-212

Emission Source Reference No.
94-0072-05
LAER
RACT

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 confidential and dated May 9, 1990. All representations, agreement to terms and conditions and covenants made by the 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.

(continued on the next page)

John W. Walton
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

a. The volatile organic compound (VOC) content of the enamel, clean-up solvent, and Dri-Lube shall not exceed the amount specified in the confidential application of May 9, 1990.

b. The maximum usage rates of basecoat, topcoat, Dri-Lube and clean-up solvent shall not exceed the maximum usage rates for each category specified in the confidential letter of May 9, 1990.

c. Heat input capacity shall not exceed the amounts listed below:

Ovens (PES 201-212)	24 MMBTU/Hr total for all twelve ovens

3. Volatile Organic Compounds (VOC) emitted from each oven shall not exceed 0.3 Pounds VOC per Gallon of Basecoat and topcoat enamel as controlled, daily average over a calendar month.

4. Volatile Organic Compounds (VOC) emitted from this source shall not exceed 4.49 Pounds VOC per Gallon of clean-up solvent.

5. Volatile Organic Compounds (VOC) emitted from this source shall not exceed 5.87 Pounds VOC per Gallon of dri-lube.

6. Particulate matter emitted from each oven shall not exceed 0.52 Pounds per Hour for all twelve ovens.

7. This permit is valid only for natural gas and liquid propane fuels.

8. Visible emissions from this source shall not exceed 20 percent or greater opacity as determined by EPA Method 9, as published in the Federal Register, Volume 39, Number 219 on November 12, 1974. (6 minute average)

9. This permit is valid only when the afterburner is in use.

10. A log of the enamel, dri-lube, and solvent usage and the material safety data sheets must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. This log must be retained for a period of not less than three years.

11. Should proof of compliance with condition 2 a be required, EPA Method 24 shall be used.

12. Should proof of compliance with condition 3 be required, EPA Method 25 shall be used.

13. The source owner or operator will continually seek new technology to include (but not be limited to): (1) selection and use of non-VOC dri-lubes for products where they can be used; (2) selection and use of higher solids percent enamels and water-base coatings when technically acceptable and available to the magnetic wire coating industry. Status reports will be submitted annually to the Technical Secretary addressing each emerging technology. The initial reports will be due one year after the end of the calendar year 1992 and each year thereafter.

14. Good housekeeping procedures shall include the following: minimizing the lube and enamel delivery system leaks; maintain all the clean-up rags stored in covered containers prior to appropriate disposal; and reusable totes for enamel and dri-lube.

(Continued on the next page)

15. Pursuant to Tennessee Air Pollution Control Board Order 94-14 dated April 13, 1994 Reasonably Available Control Technology (RACT) is stipulated for VOC emission control on lubricant application by the following conditions.

    a. Lubricant shall be applied by wick applicator only.

    b. The volatile organic compound content of the lubricant shall not exceed 5.87 pounds per Gallon, as applied and excluding water and exempt compounds (as defined in Rule 1200-3-18-.01). See condition 5.

    c. In addition to satisfying the requirements of Paragraphs 1200-3-18-.03(1) and (3) of the Tennessee Air Pollution Control Regulations, records shall be maintained of the quantity of lubricant used per calendar month. Each record shall be kept for at least three years after the date the record is created, and shall be made available to the Technical Secretary upon request. See condition 10.

    d. By March 31 of each year, a report shall be submitted to the Technical Secretary of results of research and development in reducing volatile organic compound (VOC) emissions from the lubricant application operation (such as reformulation of the lubricant, improvement in application efficiency, process changes to reduce or eliminate the need for lubricant application, and installation of emission control systems) and of reductions achieved by implementation of new emission reduction methods. See condition 13.

16. 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 1200-3-9-.02(3).

(END OF CONDITIONS)

Because Ocean City is in the height of the tourist season and because no comments were received about the bridge schedule change, good cause exists to make the final rule effective upon publication.

Regulatory Evaluation

This regulation is not a significant regulatory action under Section 3(f) of Executive Order 12866 and does not require an assessment of potential costs and benefits under section 6(a)3 of that order. It has been exempted from review by the Office of Management and Budget under that order. It is not significant under the regulatory policies and procedures of the Department of Transportation (DOT) (44 FR 11040, February 26, 1979). The Coast Guard expects the economic impact of this final rule to be so minimal that a full Regulatory Evaluation under paragraph 10e of the regulatory policies and procedures of DOT is unnecessary.

Small Entities

Under the Regulatory Flexibility Act (5 U.S.C. 601 *et seq.*), the U.S. Coast Guard considered whether this rule would have a significant economic impact on a substantial number of small entities. "Small entities" included independently owned and operated small businesses that are not dominant in their field and that otherwise qualify as "small business concerns" under section 3 of the Small Business Act (15 U.S.C. 632). Because it expects the impact of this final rule to be minimal on the maritime industry, the Coast Guard certifies under section 605(b) of the Regulatory Flexibility Act (5 U.S.C. 601 *et seq.*) that the rule will not have a significant economic impact on a substantial number of small entities.

Collection of Information

This rule contains no collection of information requirements under the Paperwork Reduction Act (44 U.S.C. 3501 *et seq.*)

Federalism

This action has been analyzed in accordance with the principles and criteria contained in Executive Order 12612, and it has been determined that this regulation does not raise sufficient federalism implications to warrant the preparation of a Federalism Assessment.

Environment

The Coast Guard considered the environmental impact of this final rule and concluded that under section 2.B.2.e.(32)(e) of Commandant Instruction M16475.1B (as amended by 59 FR 38654, 29 July 1994), this final rule is categorically excluded from further environmental documentation. A Categorical Exclusion Determination statement has been prepared and placed in the rulemaking docket.

List of Subjects in 33 CFR Part 117

Bridges.

Regulations

In consideration of the foregoing, the Coast Guard is amending part 117 of title 33, Code of Federal Regulations, as follows:

PART 117—DRAWBRIDGE OPERATION REGULATIONS

1. The authority citation for part 117 continues as follows

Authority: 33 U.S.C. 499; 49 CFR 1.46; 33 CFR 1.05–1(g); section 117.255 also issued under the authority of Pub. L. 102–587, 106 Stat. 5039.

2. Section 117.559 is revised to read as follows:

§ 117.559 Isle of Wight Bay

The draw of the US50 bridge, mile 0.5, at Ocean City, shall open on signal; except that, from October 1 through April 30 from 6 p.m. to 6 a.m., the draw shall open if at least three hours notice is given and from May 25 through September 15 from 9:25 a.m. to 9:55 p.m. the draw shall open at 25 minutes after and 55 minutes after the hour for a maximum of five minutes to let accumulated vessels pass, except that, on Saturdays from 1 p.m. to 5 p.m., the draw shall open on the hour for all waiting vessels and shall remain in the open position until all waiting vessels pass.

Dated: July 14, 1997.

Roger T. Rufe, Jr.,

Vice Admiral, U.S. Coast Guard, Commander, Fifth Coast Guard District.

[FR Doc. 97–19224 Filed 7–18–97; 8:45 am]

BILLING CODE 4910–14–M

ENVIRONMENTAL PROTECTION AGENCY

40 CFR Part 52

[TN159–1–9704(b); TN174–1–9726(b); TN175–1–9725(b); FRL–5859–5]

Approval of Source Specific Revisions to the Tennessee SIP Regarding Volatile Organic Compounds

AGENCY: Environmental Protection Agency (EPA).

ACTION: Direct final rule.

SUMMARY: In this document, EPA is taking action on three source specific revisions to the Tennessee State Implementation Plan (SIP) which establish reasonably available control technology requirements (RACT) for the control of volatile organic compound (VOC) emissions from certain operations at Brunswick Marine Corporation, Outboard Marine Corporation, and Essex Group Incorporated. EPA is approving the operating permits for these sources into the SIP with the exception of the portion of one permit which allows the Tennessee Technical Secretary to determine RACT which is being disapproved. These permits were issued consistent with the alternate control plans which established RACT requirements in accordance with the provisions of the Tennessee SIP for developing VOC emission control requirements for major sources for which there is no regulation or guidance for determining RACT.

DATES: This action is effective September 19, 1997, unless adverse or critical comments are received by August 20, 1997. If the effective date is delayed, timely notice will be published in the **Federal Register**.

ADDRESSES: Written comments on this action should be addressed to William Denman at the Environmental Protection Agency, Region 4 Air Planning Branch, 61 Forsyth Street, SW, Atlanta, Georgia 30303. Copies of documents relative to this action are available for public inspection during normal business hours at the following locations. The interested persons wanting to examine these documents should make an appointment with the appropriate office at least 24 hours before the visiting day. Reference files TN159–01–9704, TN174–01–9726, and TN175–01–9726. The Region 4 office may have additional background documents not available at the other locations.

Air and Radiation Docket and Information Center (Air Docket 6102), U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460.

Environmental Protection Agency, Region 4 Air Planning Branch, 61 Forsyth Street, SW, Atlanta, Georgia 30303. William Denman, 404/562–9030.

Tennessee Department of Environment and Conservation, Division of Air Pollution Control, L & C Annex, 9th Floor, 401 Church Street, Nashville, Tennessee 37243–1531.

FOR FURTHER INFORMATION CONTACT: William Denman at 404/562–9030.

SUPPLEMENTARY INFORMATION: On December 20, 1995, Tennessee submitted a permit for Brunswick

Marine Corporation (permit number 743652P), and on June 3, 1996, Tennessee submitted permits for Outboard Marine Corporation (permit number 039845P & 044881P), and Essex Group Incorporated (permits numbers 045011P, 045012P, & 045013P). These operating permits were submitted to EPA for the purpose of establishing RACT requirements for certain VOC emitting operations at these facilities. These permits contain source specific RACT requirements which were established in accordance with Tennessee rule 1200–3–18–.79 "Other Facilities that Emit Volatile Organic Compounds (VOC's) of One Hundred Tons Per Year." This rule contains presumptive RACT requirements for major sources not subject to an EPA control technique guideline (CTG). These requirements include meeting presumptive RACT emission limits for certain operations, installation and operation of an emission capture system which achieves 90 percent capture, certification of compliance, maintenance of records, and self reporting of exceedances. However, if the implementation of the presumptive RACT measures listed in the rule are determined to be either technically or economically infeasible this rule provides for the development of an alternate control plan. This alternative control plan must be approved into the SIP. For an alternate control plan to be approved into the SIP, the State must provide a demonstration that the presumptive RACT measures contained in rule 1200–3–18–.79 are either technically or economically infeasible for their application. The State provided to EPA a comprehensive demonstration that it was either technically or economically infeasible to implement the presumptive RACT requirements contained in rule 1200–3–18–.79 for certain sources at these three facilities. These demonstrations are part of the RACT determinations and are contained in the technical support document developed for this action. The demonstrations contain a comparison of control measures used at similar facilities and other potential RACT measures. Some alternatives investigated were technically infeasible and some were determined to be economically infeasible. For the fiberglass boat manufacturers the RACT determination is equivalent to the South Coast Air Quality Management District of California's production rule 1162. VOC reductions will be obtained through a combination of process modifications and material substitutions. For the lubricant application operation at the Essex Group facility, RACT was determined to be good housekeeping practices to reduce fugitive emissions, use of non-VOC dri-lubes as permitted by customers, and application of dri-lube through a proprietary wick process. EPA has determined that these demonstrations adequately proved that other RACT measures are infeasible and that the RACT measures established for these operations meet the Agency's requirements for alternative RACT. The specific RACT measures which were developed for certain sources at these three facilities are described below.

I. Brunswick Marine Corporation Source Specific RACT Requirements

On April 13, 1994, the Tennessee Air Pollution Control Board approved an alternate control plan which established RACT requirements for certain VOC emitting operations at the Brunswick Marine Corporation facility located in Murfreesboro, Tennessee. On February 21, 1996, Tennessee issued operating permit number 743652P to Brunswick Marine containing the RACT requirements discussed above. EPA is approving this permit into the SIP with the exception of the phrase "unless alternative factors can be established empirically and are approved by the Technical Secretary" contained in permit condition #18(1)(f) which is being disapproved. The following RACT requirements were established in the operating permit for certain VOC emitting operations at Brunswick Marine facility.

1. *Decks and Hulls Production:*

a. In the laminating process of the decks only non-atomizing techniques shall be used. These techniques include the use of airless or air-assisted airless spray guns, which include wet out and "chopper" guns, and techniques such as use of pressure fed rollers.

b. Airless or air-assisted airless spraying equipment shall be utilized where possible during the gelcoat application. This equipment was installed and utilized for pigmented and clear gelcoats by January 1, 1995. However, during the application of polyflake gelcoats, air-atomized techniques may be used.

c. In the laminating process of hulls, the dry glass reinforcement shall be placed into the molds by hand and catalyzed resin shall be applied to the dry glass using non-atomizing techniques such as pressure fed rollers, wet out and "chopper" guns or bucket and brush techniques.

d. Mix gelcoats contain VOC's including styrene, MEKP and MMA. The MEKP content of gelcoat shall not exceed 2 percent by weight under normal operating conditions. A maximum of 2.5 percent MEKP may be used when necessary due to cold weather conditions.

e. The styrene content of lamination resins shall not exceed 37 percent by weight. The styrene content of gelcoat shall not exceed 48 percent by weight. The methyl methacrylate (MMA) content of gelcoat shall not exceed 10 percent by weight.

f. Emissions of styrene may be determined quantitatively by using the factors 18 percent by weight for spray operations and 10 percent weight for hand lay up operations.

g. The styrene content of the gelcoat used for tooling purposes shall not exceed 50 percent by weight, and shall be utilized only during the construction and repair of molds.

2. *Carpet Adhesive Application:* Adhesives containing solvents which are ozone depleting chemicals are being phased out of this operation because of the adverse environmental effect of release of these chemicals to the atmosphere. Adhesives containing volatile organic compounds (VOC) are currently the only known technically feasible materials, other than adhesives containing ozone depleting chemicals as solvents, that can be used for this operation. Therefore, adhesives containing VOC may be used in this operation. The allowable VOC content of adhesives used in this operation shall be 4.4 lbs VOC/gallon with a maximum usage rate of 313 gallons/month.

3. *Miscellaneous:* Total volatile organic compound (VOC) emissions from other VOC emitting operations which are subject to Rule 1200–3–18–.79 shall not be in excess of 3 percent of the total VOC emitted from all operations subject to this rule. Compliance with this requirement shall be on a calendar month basis.

II. Outboard Marine Corporation Source Specific RACT Requirements

On April 13, 1994, the Tennessee Air Pollution Control Board approved an alternate control plan which established RACT requirements for certain VOC emitting operations at the Outboard Marine Corporation's boat manufacturing facility located in Murfreesboro, Tennessee. On July 27, 1995, and May 31, 1996, Tennessee issued two operating permits (permit number 039845P & 044881P) to Outboard Marine containing the RACT requirements for certain sources. EPA is approving these operating permits into the SIP for the purpose of establishing federally enforceable RACT measures. The RACT requirements contained in

the operating permit which were established for certain VOC emitting operations at Brunswick Marine are as follows.

1. *Decks and Hulls Production:*

a. In the laminating process of decks larger than 21 feet in length, only non-atomizing resin application techniques such as a flow coater or pressure feed roller shall be used to apply the catalyzed resin to wet the glass fibers and mold surfaces. In the laminating process of decks smaller than 21 feet in length, techniques such as airless or air-assisted airless spray guns, which include wet out and "chopper" guns, and pressure fed rollers and flow coaters shall be used.

b. Only airless or air-assisted airless spraying equipment shall be used for pigmented gelcoat application.

c. In the laminating process of hulls, the dry glass reinforcement shall be placed into the molds by hand and catalyzed resin shall be applied to the dry glass using non-atomizing resin application techniques such as a flow coater or pressure fed roller.

d. Mixed gelcoat may contain the VOC's styrene, methyl methacrylate (MMA) and MEKP. The MEKP content of gelcoat shall not exceed 2 percent by weight under normal operating conditions. A maximum of 2.5 percent MEKP may be used when necessary due to cold weather conditions.

e. The styrene content of lamination resins shall not exceed 35 percent by weight. The combined styrene and MMA content of pigmented gelcoat shall not exceed 47 percent by weight and of the metal flake clear gelcoat 53 percent by weight.

f. Emissions of styrene shall be calculated based on 18 percent by weight for atomized spray operations and 10 percent weight for hand lay up operations.

g. For tooling purposes only the styrene content of gelcoat and resin shall not exceed 50 percent by weight, and shall be used only for the purpose of building and repairing molds.

h. Tooling gelcoat shall be used only for the purpose of building and repairing molds.

2. *Carpet Adhesive Application:* The VOC's emitted from this source shall not exceed 1.2 pounds per gallon of glue applied. Glue usage at this source shall not exceed 240 gallons per day.

3. *Miscellaneous:* Total VOC emissions from other VOC emitting operations which are subject to Rule 1200–3–18–.79 shall not be in excess of 3 percent of the total VOC emitted from all operations subject to this rule. Compliance with this requirement shall be on a calendar month basis.

III. Essex Group Inc. Source Specific RACT Requirements

On April 13, 1994, the Tennessee Air Pollution Control Board approved an alternate control plan which established RACT requirements for VOC emission control on the lubricant application to enameled wire at Essex Group, Incorporated's Franklin, Tennessee, Magnet Wire coating facility. On May 31, 1996, Tennessee issued three operating permits (permit number 045011P, 045012P & 045013P) to Essex Group containing the RACT requirements for its magnet wire coating processes. In addition to providing for RACT requirements pursuant to the Tennessee regulation for the coating of magnet wire, the permits also contain source specific RACT requirements for the lubrication application process. EPA is approving these operating permits into the SIP for the purpose of establishing federally enforceable RACT measures for the lubrication application process. The specific RACT requirements contained in the operating permit to control VOC emissions from the lubrication application process are as follows.

1. Lubricant shall be applied by wick applicator only.

2. The VOC content of the lubricant shall not exceed 5.87 pounds per gallon, as applied and excluding water and exempt compounds.

3. In addition to satisfying the requirements of paragraphs 1200–3–18–.03 (1) and (3) of the Tennessee Air Pollution Control Regulations, records shall be maintained of the quantity of lubricant used per calendar month. Each record shall be kept for at least 3 years after the date the record is created, and shall be made available to the Technical Secretary upon request.

4. By March 31 of each year, a report shall be submitted to the Technical Secretary of results of research and development in reducing VOC emissions from the lubricant application operation (such as by reformulation of the lubricant, improvement in application efficiency, process changes to reduce or eliminate the need for lubricant application, and installation of emission control systems), and of reductions achieved by implementation of new emission reduction methods.

Final Action

The EPA is approving these revisions to the Tennessee SIP with the exception of the phrase "unless alternative factors can be established empirically and are approved by the Technical Secretary" contained in condition number 18 of permit number 743652P which is being disapproved as discussed in the supplementary section of this document. The EPA is publishing this action without prior proposal because the Agency views this as a noncontroversial amendment and anticipates no adverse comments. However, in a separate document in this **Federal Register** publication, the EPA is proposing to approve the SIP revision should adverse or critical comments be filed. This action will be effective September 19, 1997 unless, by August 20, 1997, adverse or critical comments are received.

If the EPA receives such comments, this action will be withdrawn before the effective date by publishing a subsequent document that will withdraw the final action. All public comments received will be addressed in a subsequent final rule based on this action serving as a proposed rule. The EPA will not institute a second comment period on this action. Any parties interested in commenting on this action should do so at this time. If no such comments are received, the public is advised that this action will be effective September 19, 1997.

Nothing in this action should be construed as permitting or allowing or establishing a precedent for any future request for revision to any state implementation plan. Each request for revision to the state implementation plan shall be considered separately in light of specific technical, economic, and environmental factors and in relation to relevant statutory and regulatory requirements.

Administrative Requirements

A. Executive Order 12866

The Office of Management and Budget (OMB) has exempted this regulatory action from E.O. 12866 review.

B. Regulatory Flexibility Act

Under the Regulatory Flexibility Act, 5 U.S.C. 600 *et seq.*, EPA must prepare a regulatory flexibility analysis assessing the impact of any proposed or final rule on small entities. 5 U.S.C. 603 and 604. Alternatively, EPA may certify that the rule will not have a significant impact on a substantial number of small entities. Small entities include small businesses, small not-for-profit enterprises, and government entities with jurisdiction over populations of less than 50,000.

SIP approvals under section 110 and subchapter I, part D of the Clean Air Act do not create any new requirements but simply approve requirements that the State is already imposing. Therefore, because the Federal SIP approval does

not impose any new requirements, the Administrator certifies that it does not have a significant impact on any small entities affected. Moreover, due to the nature of the Federal-State relationship under the CAA, preparation of a flexibility analysis would constitute Federal inquiry into the economic reasonableness of state action. The Clean Air Act forbids EPA to base its actions concerning SIPs on such grounds. *Union Electric Co.* v. *U.S. EPA*, 427 U.S. 246, 255–66 (1976); 42 U.S.C. 7410(a)(2) and 7410(k)(3).

The portion disapproved only affects one source, Brunswick Marine Corporation. Therefore, it does not have a significant impact on a substantial number of small entities. Furthermore, as explained in this document, the portion of the request disapproved does not meet the requirements of the CAA and EPA cannot approve the request. Therefore, EPA has no option but to disapprove this portion of the submittal.

C. Unfunded Mandates

Under section 202 of the Unfunded Mandates Reform Act of 1995 ("Unfunded Mandates Act"), signed into law on March 22, 1995, EPA must prepare a budgetary impact statement to accompany any proposed or final rule that includes a Federal mandate that may result in estimated costs to State, local, or tribal governments in the aggregate; or to private sector, of $100 million or more. Under section 205, EPA must select the most cost-effective and least burdensome alternative that achieves the objectives of the rule and is consistent with statutory requirements. Section 203 requires EPA to establish a plan for informing and advising any small governments that may be significantly or uniquely impacted by the rule.

EPA has determined that the approval action promulgated does not include a Federal mandate that may result in estimated costs of $100 million or more to either State, local, or tribal governments in the aggregate, or to the private sector. This Federal action approves pre-existing requirements under State or local law, and imposes no new requirements. Accordingly, no additional costs to State, local, or tribal governments, or to the private sector, result from this action.

D. Submission to Congress and the General Accounting Office

Under 5 U.S.C. 801(a)(1)(A) as added by the Small Business Regulatory Enforcement Fairness Act of 1996, EPA submitted a report containing this rule and other required information to the U.S. Senate, the U.S. House of Representatives and the Comptroller General of the General Accounting Office prior to publication of the rule in today's **Federal Register**. This rule is not a "major rule" as defined by 5 U.S.C. 804(2).

E. Petitions for Judicial Review

Under section 307(b)(1) of the Clean Air Act, petitions for judicial review of this action must be filed in the United States Court of Appeals for the appropriate circuit by September 19, 1997. Filing a petition for reconsideration by the Administrator of this final rule does not affect the finality of this rule for the purposes of judicial review nor does it extend the time within which a petition for judicial review may be filed, and shall not postpone the effectiveness of such rule or action. This action may not be challenged later in proceedings to enforce its requirements. (See section 307(b)(2).)

List of Subjects in 40 CFR Part 52

Environmental protection, Air pollution control, Hydrocarbons, Incorporation by reference, Ozone, Reporting and recordkeeping requirements.

Dated: July 3, 1997.

Michael V. Peyton,

Acting Regional Administrator.

Part 52 of chapter I, title 40, Code of Federal Regulations, is amended as follows:

PART 52—[AMENDED]

1. The authority citation for part 52 continues to read as follows:

Authority: 42.U.S.C. 7401–7671q.

Subpart RR—Tennessee

2. Section 52.2220, is amended by adding paragraph (c)(156) to read as follows:

§ 52.2220 Identification of plan.

* * * * *

(c) * * *

(156) Addition of six operating permits containing source specific VOC RACT requirements for certain VOC sources at Brunswick Marine Corporation, Outboard Marine Corporation, and Essex Group Incorporated submitted by the Tennessee Department of Environment and Conservation on December 20, 1995 and June 3, 1996.

(i) Incorporation by reference.

(A) Marine Group Brunswick Corporation operating permit number 743652P issued February 21, 1996, (conditions number 2, 3, and 18).

(B) Stratos Boat Incorporated, D.B.A. Javelin Boats operating permit number 039845P issued on July 27, 1995, (conditions number 2 and 3), and permit number 044881P issued on May 31, 1996, (conditions number 2, 9, and 10).

(C) Essex Group Incorporated operating permit numbers 045011P, (conditions 5, 10, 13, and 15), 045012P, (conditions 5, 10, 13, and 15) and 045013P, (conditions 5 and 16) issued on May 31, 1996.

(ii) Other material. None.

[FR Doc. 97–19084 Filed 7–18–97; 8:45 am]

BILLING CODE 6560–50–P

ENVIRONMENTAL PROTECTION AGENCY

40 CFR Part 52

[VA040–5017 & VA009–5017; FRL–5846–5]

Approval and Promulgation of Air Quality Implementation Plans; Virginia: Approval of Group III SIP and Coke Oven Rules for Particulate Matter

AGENCY: Environmental Protection Agency (EPA).

ACTION: Direct final rule.

SUMMARY: EPA is approving two State Implementation Plan (SIP) revisions submitted by the Commonwealth of Virginia. Approval of Virginia's Group III SIP establishes an ambient air quality standard for particulate matter smaller than 10 micrometers in diameter (PM–10); provides regulatory definitions for "particulate matter," "particulate matter emissions," "PM10," "PM10 emissions," and "total suspended particulate matter" (TSP); and modifies rules regarding air pollution episodes to include PM–10 as well as TSP action levels. Approval of the coke oven provisions provides for limits on mass emissions, opacity, and fugitive dust from nonrecovery coke works. This action is a result of existing particulate matter planning requirements and is not related to current EPA rulemaking regarding proposed revisions to National Ambient Air Quality Standards (NAAQS) for particulate matter. There are no PM–10 nonattainment areas in the Commonwealth of Virginia. This action is being taken under section 110 of the Clean Air Act.

DATES: This action is effective September 19, 1997 unless within August 20, 1997, adverse or critical comments are received. If the effective date is delayed, timely notice will be published in the **Federal Register**.

ADDRESSES: Comments may be mailed to Makeba A. Morris, Chief, Technical

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
9TH FLOOR L & C ANNEX
401 CHURCH STREET
NASHVILLE, TENNESSEE 37243-1531

May 14, 2012

A. Stanley Meiburg
Regional Administrator
US EPA, Region IV
Atlanta Federal Center, 12th Floor
61 Forsyth Street, SW
Atlanta, GA 30303-3104

RE: Tennessee Regional Haze State Implementation Plan

Dear Mr. Meiburg:

On May 9, 2012, the Tennessee Air Pollution Control Board adopted Board Order 12-008. The Board Order approves the withdrawal of operating permit 061873H (BART permit for Eastman Chemical Company issued March 31, 2008). The Order also approves the submittal of the *Alternative BART Determination for Eastman Chemical Company – Tennessee Operations* and operating permit 066116H (BART permit for Eastman Chemical Company issued May 9, 2012) to U. S. EPA for adoption into Tennessee's Regional Haze State Implementation Plan. We have worked closely with your staff throughout the process and greatly appreciate their timely efforts and consideration regarding this matter.

A hard copy of the SIP submittal is enclosed with supporting documentation, and the following page lists specific documents included with this submittal. If you have any questions or comments concerning the enclosed materials, please contact Quincy Styke III at (615) 532-0562, or Quincy.Styke@tn.gov .

Sincerely,

Barry R. Stephens, P.E.
Director
Division of Air Pollution Control

Enclosures

Cc via Email: Beverly Banister, EPA Region IV
Lynorae Benjamin, EPA Region IV
David Barom, Earth Justice
Patricia Brewer, DOI, NPS-ARD
Stephen Gossett, Eastman Chemical Company

SIP Submittal Documents
List of Attachments

Attachment	Description
Attachment 1	Regional Haze Alternative BART Determination – Eastman Chemical Company
Attachment 2	Public Notice Information
Attachment 3	Public Comment Summary (Hearing Officer Statement and Public Comments from Eastman Chemical Company, Earth Justice, National Park Service, and EPA)
Attachment 4	BART Permit 066116H
Attachment 5	Board Order 12-008

Regional Haze State Implementation Plan

for

Tennessee Class I Areas

Alternative BART Determination

Eastman Chemical Company – Tennessee Operations

Prepared by

Tennessee Department of Environment and Conservation

Division of Air Pollution Control

April 4, 2012

Attachment 1

Regional Haze Alternative BART Determination – Eastman Chemical Company

Appendix L-13

Alternative BART Determination

Eastman Chemical Company – Tennessee Operations

Eastman Chemical Alternative BART Determination:

Pursuant to 40 CFR 51.308(e)(2), the state of Tennessee is establishing an alternate emission reduction measure for its best available retrofit technology (BART) determination at the Eastman Chemical Company's (Eastman) B-253 Powerhouse in Kingsport, Tennessee. A new permit condition will be added to the existing permit No. 061873H (See Attachment 1, page 12, Condition 4) that establishes this new Tennessee State Implementation Plan (SIP) applicable requirement.

In accordance with Rule 1200-03-9-.02(11)(f)5.(i), only the portion of the current permit that pertains to the addition to this new SIP applicable requirement is being reopened. Generally, the state of Tennessee must prove to EPA's satisfaction that the alternative BART measures at Eastman's B-253 Powerhouse will result in a greater reasonable progress than would have resulted from the installation and operation of the post combustion controls when burning coal as described in Conditions 1-3 of Permit No. 061873H (See Attachment 1, pages 12 and 13).

The federal regional haze regulations allow states to set a BART limit or an Alternative BART limit. If Eastman chooses BART it must be implemented by April 30, 2017. If Eastman chooses to implement Alternative BART, it must be implemented by July 31, 2018.

40 CFR 51.308(e)(2) establishes criteria that must be satisfied to prove the greater reasonable progress requirement and obtain federal approval of the alternative BART measure at the Powerhouse B-253.

The first criteria at 40 CFR 51.308(e)(2)(i)(A) requires a list of all BART-eligible sources within Tennessee. This listing may be viewed at Appendix L of the Tennessee Regional Haze SIP and it is also presented as follows:

TABLE OF CONTENTS

Figure 1- TN BART Eligible Sources Locations

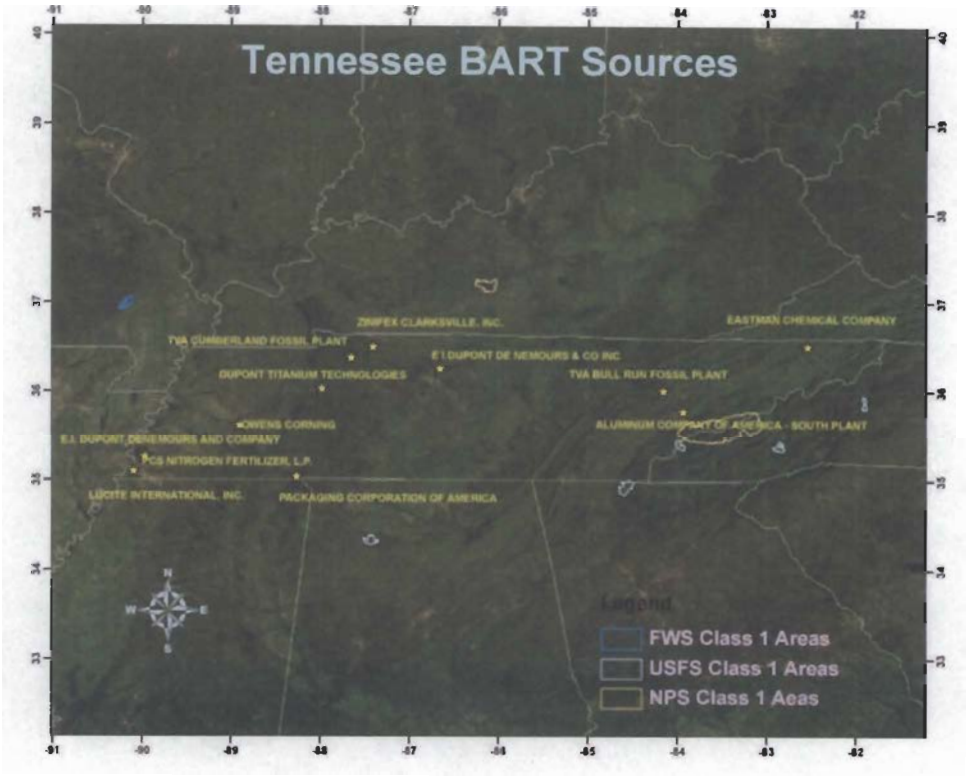

Figure 2- TN BART Eligible Sources and Class I Areas

			Facility Distances to Class I Areas (Km)									
			Cohutta	Great Smoky	Mountain	Joyce Kilmer	Slickrock	Linville Gorge WA	Mammoth Cave NP	Shining Rock WA	Sipsey	James River	Mingo Wilderness Refu
BART Evaluations	#	Facility Name	COHU	GRSM		JOYC		LIGO	MACA	SHRO	SIPS	JARI	MING
BART Exempt SourcesOld IMPROVE Equ. 12 Km.	1	DuPont - Humphreys County							203		200		225
	2	DuPont - Shelby County									216		218
	3	Lucite International									253		187
	4	Owens Corning							297		200		187
	5	PCS Nitrogen									253		186
	6	Zinifex - Clarksville	312						131		247		256
BART Exempt Sources old IMPROVE Equ. 4 Km.	7	TVA - Bull Run Fossil Plant	118	48		63		200	209	131			
	8	Packaging Corporation of America							299		100		273
BART Subject SourcesNew IMPROVE Equ.	9	Alcoa - South Plant	99	18		16		185	244	108			
	10	DuPont - Old Hickory	233	249		254			105		220		
	11	Eastman Chemical	245	98		174		85		124		289	
BART Subject SourceOld IMPROVE Equ.	12	TVA-Cumberland Fossil Plant							153		223		233

Proposed Exempt Source
Non-exempt Source
Non-exempt Utility

FACILITY NAME:

1) Aluminum Company of America (Alcoa) – South Plant

2) DuPont White Pigment and Mineral Products (Humphreys County)

3) Eastman Chemical Company – Tennessee Operations

4) E I DuPont de Nemours and Company, Inc. (Old Hickory)

5) E I DuPont de Nemours and Company, Inc. (Shelby County)

6) Holston Army Ammunition Plant

7) Inter-trade Holdings, Inc.

8) Liberty Fibers Corporation

9) Lucite International

10) Owens Corning

11) Packaging Corporation of America (PCA)

12) PCS Nitrogen

13) Tennessee Valley Authority (TVA) – Bull Run Fossil Plant

14) Tennessee Valley Authority (TVA) – Cumberland Fossil Plant

15) Zinifex

16) Weyerhaeuser Corporation (now Domtar Paper Company) – Sullivan County

Tennessee initially identified the above sixteen (16) facilities as BART-eligible sources. Since the time that the BART-eligible sources were identified, Liberty Fibers Corporation has permanently shut down, and the BART-eligible boilers located at the facility have been dismantled. Additionally, Inter-trade Holdings, Inc. has permanently shut down the acid plant that was determined to be BART-eligible (a reduction of sulfur dioxide of approximately 374 tons per year). Holston Army Ammunition Plant has requested a permit limit of 249 tons per year for the emissions units that make up their acid plant The Division of Air Pollution Control issued a federally enforceable permit restricting the acid plant emissions to 249 tons per year on February 25, 2008 (See Appendix L-12, pages 3-4). The subject acid plant consists of eight sources, with combined potential emissions of 638.2 tons of nitrogen oxides (NOx) before the issuance of the federally enforceable permit. However, this part of the facility has not been operated since 1997. The remaining sources with potential emissions above 250 TPY at this

facility were either built before August 1962 or were built or modified after the promulgation of major NSR rules in 1977. The power boiler (#7) at the Weyerhaeuser facility (now Domtar Paper Company) in Sullivan County has been retired and the facility is no longer BART eligible. For more detailed permit information on these BART exempted sources, see Appendix L-12.
The BART status of the remaining twelve (12) operational sources is as follows:

1) Aluminum Company of America (Alcoa) – South Plant
2) DuPont White Pigment and Mineral Products (Humphreys County)
3) **Eastman Chemical Company – Tennessee Operations**
4) E I DuPont de Nemours and Company, Inc. (Old Hickory)
5) E I DuPont de Nemours and Company, Inc. (Shelby County)
6) Lucite International
7) Owens Corning
8) Packaging Corporation of America (PCA)
9) PCS Nitrogen
10) Tennessee Valley Authority (TVA) – Bull Run Fossil Plant
11) Tennessee Valley Authority (TVA) – Cumberland Fossil Plant
12) Zinifex

A spreadsheet of Tennessee's BART-eligible source emissions is included as Appendix L-2. A spreadsheet of TN's BART-eligible sources' SO2 emissions and distance to Class I areas is included as Appendix L-3.

TN BART-eligible sources were presumed to be subject to BART but were provided the opportunity to submit modeling demonstrations showing that they did not contribute to visibility impairment, i.e., had less than 0.5 deciviews (dv) impact, on any Class I area within 300 km and thus could be exempt.

40 CFR 51.308(e)(2)(i)(B) requires a list of all BART-eligible sources and all BART source categories covered by the program. The alternative BART being established under this action only pertains to the five boilers at Eastman's B-253 Powerhouse. It does not establish a trading program within the meaning of the federal BART regulations. As mentioned previously, the state of Tennessee is establishing a source specific permit limitation in its Regional Haze SIP that applies only to the five boilers at Eastman's B-253 Powerhouse. No other BART eligible facility will be subject to this alternative BART control measure. While EPA has not yet taken final

action on the Tennessee Regional Haze SIP, it is believed that all applicable requirements of establishing a BART limitation have been met. If EPA approves the coal-fired, post combustion control BART demonstration that appears in Condition 1 of Permit No. 061873H in the Tennessee Regional Haze SIP, it should satisfy the requirement of Section 302(c) or paragraph (e)(1) of the section, or otherwise addressed under paragraphs (e)(1) or (e)(4) of the section.

40 CFR 51.308(e)(2)(i)(C) requires an analysis of the best system of continuous emission control technology available and associated emission reductions achievable for each source within Tennessee subject to BART and covered by the alternative program. As mentioned previously, the alternative BART being established in this action is limited to the five boilers at Eastman's B-253 Powerhouse with no trading at other BART facilities in Tennessee. TDEC previously determined BART for these units in its April 4, 2008 Regional Haze SIP. There is no change to the determination that a 0.2 lb SO_2/MMBtu limit is BART for these units. If Eastman elects to pursue its plan to re-power all five coal-fired boilers at its B-253 Powerhouse to natural gas firing, Tennessee has made the determination that it will represent the ultimate control of sulfur oxides, and is far superior to reducing this visibility impairing pollutant compared to coal-fired boilers using post-combustion sulfur oxides control technology. The Tennessee Regional Haze SIP has made the demonstration that sulfur oxides forming sulfates is the principal cause of visibility impairment at the Class 1 Areas in the Eastern United States. As natural gas contains essentially no sulfur, it is easily demonstrated that it is a superior method of controlling sulfur oxide emissions.

40 CFR 308(e)(2)(i)(D) requires an analysis of the projected emission reductions achievable through the trading program or other alternative measure. As mentioned previously, this action is viewed as an alternative measure in that no trading with other sources is involved.

The table below compares emission rates of sulfur oxides under each path – BART vs. alternative BART- achieved by July 31, 2018, the end of the first long-term strategy period for regional haze.

Table 1- BART versus Alternative BART SO2 Emission Limits

	Sulfur dioxide emission rate (lb/mmBtu)
BART[1] (Post-Combustion SO2 Controls)	0.2 lb/mmBtu heat input or 92 percent reduction, whichever is less stringent
Alternative BART[2] (Natural Gas Conversion)	0.0006 lb/mmBtu heat input

[1] If chosen by Eastman, BART must be installed and operated by April 30, 2017.
[2] If chosen by Eastman, Alternative BART must be installed and operated by July 31, 2018.

Table 2 below compares projected emission reductions of sulfur oxides under each path – BART vs. alternative BART.

Table 2- Projected BART versus Alternative BART SO2 and NOx Emission Reductions

Eastman BART Alternatives – Comparison of Emission Reduction Profiles

	2016		2017				2018				Comparison thru 1Q 2017	Comparison thru 2018	Comparison thru 2023
	3Q	4Q	1Q	2Q	3Q	4Q	1Q	2Q	3Q	4Q			
BART APCD Project													
SO2 Reductions(1) (tons)	0	0	0	3225	3225	3225	3225	3225	3225	3225	0	22,575	87,075
BART Alternative Natural Gas Conversion													
1st Boiler Converted	X	X	X	X	X	X	X	X	X	X			
2nd Boiler Converted			X	X	X	X	X	X	X	X			
3rd Boiler Converted					X	X	X	X	X	X			
4th Boiler Converted							X	X	X	X			
5th Boiler Converted									X	X			
SO2 Reductions (2)(tons)	750	750	1500	1500	2250	2250	3000	3000	3750	3750	3000	22,500	97,500
NOx Reductions (2)(tons)	125	125	250	250	325	325	450	450	575	575	500	3,450	14,950

(1) Assumes 2010 SO2 emissions reduced to 0.2 lb/mmBtu. Also assumes all five new APCDs operational by 2Q 2017 per BART permit condition.

(2) Assumes 2010 SO2 emissions reduced to 0 lb/mmBtu and 2010 NOx emission rate reduced by ~ 50 percent.

Table 2 represents projected emissions into the future and should not be viewed as actual emission levels and are not legally binding. The actual binding emission levels would be set in a construction permit described under condition 4(b) of proposed permit (See Attachment 1, page 14).

40 CFR 308(e)(2)(i)(E) requires a determination under paragraph (e)(3) of the section or otherwise based on the clear weight of evidence that the alternative measure achieves greater reasonable progress than would be achieved through the installation and operation of BART at the covered sources. 40 CFR 51.308(e)(3) outlines an option for a more simplistic demonstration of the adequacy of an alternative BART control measure. Essentially:

- If there is no geographic redistribution of BART eligible source emissions from a previously demonstrated BART modeling analysis, and
- If the alternative BART measure results in greater emissions reductions:

Then the alternative BART measure may be deemed to achieve greater reasonable progress. There is no geographic redistribution of emissions under the alternate BART measure for the Eastman B-253 Powerhouse. The five boilers there were the subject of a modeling demonstration in the Tennessee Regional Haze SIP. There is no trading program involved, so there should be no need for additional modeling demonstrations at the impacted Class I areas. Additionally, Table 2 above clearly demonstrates that the emission reductions are much more under alternative BART as opposed to BART. Tennessee therefore declares that these two tests are satisfied and prove that the alternative BART for the Eastman B-253 Powerhouse result in "greater reasonable progress" within the meaning of the federal regional haze rules.

Tennessee submits that Table 2 above conclusively demonstrates that emission reductions using alternative BART are greater over time than BART.

40 CFR 51.308(e)(2)(iii) requires that all necessary emission reduction take place during the period of the first long-term strategy for regional haze. An examination of the permit condition establishing alternative BART reveals that the maximum amount of time allowed to repower the five boilers at Eastman's B-253 Powerhouse is set at July 31, 2018, thereby occurring within the period of the first long-term strategy. The alternative BART permit condition also details the procedures for accounting and monitoring the emissions. Previously approved into the Tennessee SIP is Division Rule 1200-03-9-.02(6) which requires all permittees to comply with the conditions of their operating permit. Violation of the permit condition is by definition, violation of Rule 1200-03-9-.02(6) and grounds for enforcement action.

40 CFR 51.308(e)(2)(iv) requires a demonstration that emission reductions from trading or other alternative measures are surplus. As mentioned previously, this alternative BART permit condition is not part of a trading program and as such, a demonstration of surplus emission for purposes of trading is not required. The alternative BART at Eastman's B-253 Powerhouse will result in surplus emission reductions in that the additional emission reductions beyond traditional BART shown in Table 1 above are not required under the federal Clean Air Act as of the baseline date of the Tennessee Regional Haze SIP.

40 CFR 51.308(e)(2)(v) allows Tennessee the option of providing a geographic enhancement to the alternative BART measure. As the re-powering of the five boilers at Eastman's B-253 Powerhouse applies only to those boilers, does not involve trading and provides such significant reductions of visibility impairing sulfur oxides, geographic enhancements are not needed. As such, Tennessee declines this option.

Attachment-1
Eastman Chemical Company
BART Operating Permit

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: March 31, 2008

Permit Number:

061873H

Date Amended: *******DRAFT******* [AMENDMENT]

Date Expires: July 31, 2018

Issued To:

Eastman Chemical Company
Tennessee Operations

Installation Address:

South Eastman Road
Kingsport

(MSOP-02)

Installation Description:

Powerhouse B-253-I, Boilers #25-#29

Emission Source Reference No.

82-0003-00
BART

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. In accordance with the requirements of 40 CFR 51.308 (BART), the following emission limitation is established:

   Sulfur dioxide (SO_2) emissions from Boilers 25-29 shall comply with the less stringent of the following limits:

   (a) 0.20 pounds of SO_2 per million British Thermal Units (lb/MMBtu) of heat input; or

   (b) Reduce uncontrolled SO_2 emissions by 92%.

   Compliance with these emission limits shall be determined on a thirty (30) calendar day rolling average basis as the average emission rate, or average SO_2 reduction, from either each boiler individually while combusting coal, or averaged across all of the boilers that are combusting coal.

(conditions continued on next pages)

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

CN-0827 (Rev. 9-92)

RDA-1298

2. **Monitoring Requirements**:

Measurement of SO_2 emissions: SO_2 emissions shall be measured through the use of continuous in-stack monitoring for sulfur dioxide, as specified below:

The source owner or operator shall install, maintain, operate, and submit quarterly reports of excess emissions and sulfur dioxide (SO_2) removal efficiency (if applicable) from continuous in-stack monitoring systems for sulfur dioxide (SO_2). The sulfur dioxide monitoring systems shall meet all the requirements of 40 CFR 60 Appendices A and B, or 40 CFR Part 75 Appendices A and F.

Compliance will be determined on a 30 calendar day rolling average basis. Each 30 calendar day average shall be the average of the valid daily averages during the previous thirty (30) calendar days

Operational requirements for Sulfur Dioxide (SO_2) Monitoring Systems: For this fuel burning installation to demonstrate continual compliance with the BART sulfur dioxide emission limitation, each sulfur dioxide monitoring system for boilers #25-#29 shall be fully operational for at least ninety five percent (95%) of the operational time (during which coal is combusted) of the monitored units during each calendar quarter. Operational availability levels of less than these amounts may be considered the basis for declaring the fuel burning installation in noncompliance with the applicable monitoring requirements, unless the reasons for the failure to maintain these levels of operational availability are accepted by the Technical Secretary as being legitimate malfunctions of the instruments. Data recorded during periods of monitoring system breakdown, repairs, calibration checks, and zero and span adjustments shall not be included in the data averages.

Quality Assurance requirements for the Sulfur Dioxide (SO_2) Monitoring Systems: The continuous in-stack sulfur dioxide monitoring systems shall meet all of the requirements of 40 CFR Part 60 Appendix B (Performance Specification 2) and 40 CFR Part 60 Appendix F; or 40 CFR Part 75 Appendices A and B.

Monitoring Plan: Monitoring shall be conducted as specified in an approved site-specific monitoring plan. The monitoring plan must be submitted to the Technical Secretary at least ninety (90) days prior to the startup of the control device.

Recordkeeping: All records required to demonstrate compliance with this condition shall be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. Records shall be maintained for five (5) years.

3. **Compliance Schedule**: Except as otherwise allowed by **Condition 4** of this permit, Eastman Chemical Company shall comply with **Conditions 1 and 2** of this permit no later than April 30, 2017.

4. **Alternative BART Requirements**: In lieu of complying with BART as specified in **Conditions 1, 2, and 3** of this permit, the permittee may choose to implement Alternative BART, as follows:

(a) The permittee shall submit written quarterly progress reports to the Technical Secretary and to the U. S. Environmental Protection Agency (EPA), Region 4 Office. The initial report shall be submitted no later than July 1, 2012. Subsequent reports shall be submitted within one calendar quarter of the previous report.

(i) The reports shall summarize the permittee's acquisition of site-specific meteorological data at the permittee's **Kingsport** Meadowview site and the modeling results obtained from the data. Only the modeling analyses that are used to determine whether the BART requirements specified in **Conditions 1 and 2** of this permit will be sufficient to attain and maintain the one hour sulfur dioxide NAAQS need be addressed in the submittals. If the permittee concludes that compliance with **Conditions 1 and 2** of this permit are not sufficient to demonstrate attainment and maintenance of the one hour sulfur dioxide NAAQS, the permittee shall include summaries of modeling results showing the predicted ambient impacts of repowering the B-253 Powerhouse to natural gas (and other

boilers at the facility, if needed to comply with the one hour sulfur dioxide NAAQS) with the quarterly progress reports.

(ii) If the permittee determines to re-power its boilers at its Kingsport, Tennessee facility, the quarterly written report submitted according to the schedule in Condition 4(a) shall contact the natural gas supplier for the area and summarize what the permittee knows regarding the progress on the project to modify the third-party natural gas pipeline to provide sufficient natural gas to the permittee's facility.

(b) The permittee shall submit applications for any construction permit(s) as needed to establish emission limits and other applicable requirements to repower the boilers.

(c) If the permittee determines that Alternative BART is not feasible for this facility, the permittee shall provide written notification to the Technical Secretary and the EPA Region 4 Office in a final quarterly report. Upon submittal of this notification, the permittee shall comply with **Conditions 1 and 2** of this permit no later than April 30, 2017.

(d) The permittee is placed on notice that the issuance of this permit does not excuse it from any other applicable air pollution control requirements that may become applicable as a result of re-powering to natural gas.

(e) If the permittee elects to repower its B-253 Powerhouse boilers to natural gas, the conversion shall be accomplished no later than the earlier of:

(i) The compliance deadline for the one-hour sulfur dioxide NAAQS established in an approved State Implantation Plan revision, or

(ii) July 31, 2018

4. This permit contains requirements that Eastman Chemical Company must meet in addition to the requirements of Title V Operating Permit 557888.

5. This permit shall remain valid until Title V Operating Permit 557888 is reopened to include the requirements of this permit.

(end of conditions)

Attachment-2
Eastman Chemical Company
Alternative BART Public Hearing Notice

NOTICE
OF PUBLIC HEARING
TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL

There will be a public hearing before the Technical Secretary of the Tennessee Air Pollution Control Board to consider amendments to the proposed Regional Haze SIP to protect visibility in Class I areas pursuant to Tennessee Code Annotated, Section 68-201-105. The comments received at this hearing will be presented to the Tennessee Air Pollution Control Board for their consideration. The hearing will be conducted in the manner prescribed by the Uniform Administrative Procedures Act, Tennessee Code Annotated, Section 4-5-201 et. seq. and will take place in the 9th Floor Conference Room of the L & C Annex, located at 401 Church Street, Nashville, Tennessee 37243-1531 at 10:00 a.m. on May 7, 2012.

Written comments will be included in the hearing records if received by the close of business (4:30 PM CDT) May 7, 2012, at the office of the Technical Secretary, Tennessee Air Pollution Control Board, 9th Floor, L & C Annex, 401 Church Street, Nashville, TN 37243-1531.

Any individuals with disabilities who wish to participate in these proceedings (or to review these filings) should contact the Tennessee Department of Environment and Conservation to discuss any auxiliary aids or services needed to facilitate such participation. Such initial contact may be in person, by writing, telephone, or other means, and should be made no less than ten (10) days prior to May 7, 2012, or the date such party intends to review such filings, to allow time to provide such aid or service. Contact the Tennessee Department of Environment and Conservation ADA Coordinator, 12th Floor, 401 Church Street, Nashville TN 37243, (615) 532-0207. Hearing impaired callers may use the Tennessee Relay Service (1-800-848-0298).

If you have any questions about the proposed Regional Haze SIP documents you may contact Mr. Quincy Styke at (615) 532-0562. Copies of documents concerning these matters are available for review at the office of the Technical Secretary and at certain public depositories. For information about reviewing these documents, please contact Mr. Malcolm Butler, 9th Floor, L & C Annex, 401 Church Street, Nashville, TN 37243-1531, telephone (615) 532-0600.

Summary of Proposed Change

Regional haze is fine particle pollution that impairs visibility over a large region including Class I areas such as national parks and wilderness areas. Sources of haze-forming emissions include coal-fired power plants, industrial boilers, and mobile source emissions. U. S. EPA's regional haze rule requires states to demonstrate reasonable progress toward meeting the national goal of a return to natural visibility conditions by 2064. The rule directs states to show a uniform rate of progress toward natural conditions for each Class I area in Tennessee and for certain areas in other states.

Regional Haze State Implementation Plans (SIPs) must include an assessment of baseline visibility conditions and a monitoring strategy for measuring, characterizing, and reporting of regional haze visibility impairment. States must also consider ongoing control programs, measures to mitigate construction activities, source retirement and replacement schedules, smoke management programs for agriculture and forestry, and enforceability of specific measures.

This will be the third public hearing for Tennessee's Regional Haze SIP, and this hearing is limited to the proposed changes to the Best Available Retrofit Technology (BART) requirements for Powerhouse B-253 at Eastman Chemical Company in Kingsport, Tennessee. The proposed revisions provide Eastman Chemical Company the option to repower this powerhouse from coal to natural gas if it is determined to be necessary to comply with other federal requirements. At both Class I areas in Tennessee, visibility improvements on the worst days are expected to be better than the uniform rate of progress glide path by 2018 based solely on reductions from existing and planned emissions controls.

Revisions considered at this hearing may be adopted by the Tennessee Air Pollution Control Board under T.C.A. 68-201-105, the Board general authority to promulgate rules.

Materials concerning the proposed additions and/or revisions will be available for public inspection during normal working hours starting April 5, 2012, at the following locations and on this website:

Air Pollution Control Division
9th Floor, L & C Annex
401 Church Street
Nashville, TN 37243

Chattanooga – Hamilton County
Air Pollution Control Bureau
6125 Preservation Drive
Chattanooga, TN 37416

Air Pollution Control Division
Cookeville EFO
1221 South Willow Ave.
Cookeville, TN 38506

Air Pollution Control Division
Knoxville EFO
3711 Middlebrook Pk
Knoxville, TN 37921

Air Pollution Control Division
Johnson City EFO
2305 Silverdale Road
Johnson City, TN 37601 - 2162

Air Pollution Control Division
Jackson EFO
1625 Hollywood Drive
Jackson, TN 38305

Air Pollution Control Division
Columbia EFO
1421 Hampshire Pike
Columbia, TN 38401

Knox County Department of
Air Pollution Control
140 Dameron Avenue
Knoxville, TN 37917-6413

Division Air Pollution Control
Memphis - Shelby Co. Health Dept.
814 Jefferson Avenue
Memphis, TN 38105

Air Pollution Control Division
Chattanooga EFO
Suite 550
540 McCallie Ave.
Chattanooga, TN 37402 - 2013

Pollution Control Division
Metropolitan Health Department
311 23rd Ave. North
Nashville, TN 37203

U.S. EPA, Region IV
APTMD - 12th Floor
Atlanta Federal Center
61 Forsyth Street S.W.
Atlanta, Georgia 30303
c/o Mr. Scott R. Davis, Chief

Air Pollution Control Division
Nashville EFO
711 R. S. Gass Blvd.
Nashville, TN 37243

Kingsport Public Library
400 Broad Street
Kingsport, TN 37660

All persons interested in the air quality of the State of Tennessee are urged to attend and will be afforded the opportunity to present testimony to the hearing officer regarding the revisions to the proposed Regional Haze State Implementation Plan (SIP) to protect visibility in Class I areas. Any person desiring to present lengthy comments should be prepared at the hearing to offer a written statement to be incorporated into the record. Written statements not presented at the hearings will only be considered part of the records if received by 4:30 p.m. CDT May 7, 2012, at the office of the Technical Secretary, Tennessee Air Pollution Control Board, 9th Floor L & C Annex, 401 Church Street, Nashville, Tennessee, 37243-1531.

Attachment 2

Public Notice Information

NOTICE
OF PUBLIC HEARING
TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL

There will be a public hearing before the Technical Secretary of the Tennessee Air Pollution Control Board to consider amendments to the proposed Regional Haze SIP to protect visibility in Class I areas pursuant to Tennessee Code Annotated, Section 68-201-105. The comments received at this hearing will be presented to the Tennessee Air Pollution Control Board for their consideration. The hearing will be conducted in the manner prescribed by the Uniform Administrative Procedures Act, Tennessee Code Annotated, Section 4-5-201 et. seq. and will take place in the 9th Floor Conference Room of the L & C Annex, located at 401 Church Street, Nashville, Tennessee 37243-1531 at 10:00 a.m. on May 7, 2012.

Written comments will be included in the hearing records if received by the close of business (4:30 PM CDT) May 7, 2012, at the office of the Technical Secretary, Tennessee Air Pollution Control Board, 9th Floor, L & C Annex, 401 Church Street, Nashville, TN 37243-1531.

Any individuals with disabilities who wish to participate in these proceedings (or to review these filings) should contact the Tennessee Department of Environment and Conservation to discuss any auxiliary aids or services needed to facilitate such participation. Such initial contact may be in person, by writing, telephone, or other means, and should be made no less than ten (10) days prior to May 7, 2012, or the date such party intends to review such filings, to allow time to provide such aid or service. Contact the Tennessee Department of Environment and Conservation ADA Coordinator, 12th Floor, 401 Church Street, Nashville TN 37243, (615) 532-0207. Hearing impaired callers may use the Tennessee Relay Service (1-800-848-0298).

If you have any questions about the proposed Regional Haze SIP documents you may contact Mr. Quincy Styke at (615) 532-0562. Copies of documents concerning these matters are available for review at the office of the Technical Secretary and at certain public depositories. For information about reviewing these documents, please contact Mr. Malcolm Butler, 9th Floor, L & C Annex, 401 Church Street, Nashville, TN 37243-1531, telephone (615) 532-0600.

Summary of Proposed Change

Regional haze is fine particle pollution that impairs visibility over a large region including Class I areas such as national parks and wilderness areas. Sources of haze-forming emissions include coal-fired power plants, industrial boilers, and mobile source emissions. U. S. EPA's regional haze rule requires states to demonstrate reasonable progress toward meeting the national goal of a return to natural visibility conditions by 2064. The rule directs states to show a uniform rate of progress toward natural conditions for each Class I area in Tennessee and for certain areas in other states.

Regional Haze State Implementation Plans (SIPs) must include an assessment of baseline visibility conditions and a monitoring strategy for measuring, characterizing, and reporting of regional haze visibility impairment. States must also consider ongoing control programs, measures to mitigate construction activities, source retirement and replacement schedules, smoke management programs for agriculture and forestry, and enforceability of specific measures.

This will be the third public hearing for Tennessee's Regional Haze SIP, and this hearing is limited to the proposed changes to the Best Available Retrofit Technology (BART) requirements for Powerhouse B-253 at Eastman Chemical Company in Kingsport, Tennessee. The proposed revisions provide Eastman Chemical Company the option to repower this powerhouse from coal to natural gas if it is determined to be necessary to comply with other federal requirements. At both Class I areas in Tennessee, visibility improvements on the worst days are expected to be better than the uniform rate of progress glide path by 2018 based solely on reductions from existing and planned emissions controls.

Revisions considered at this hearing may be adopted by the Tennessee Air Pollution Control Board under T.C.A. 68-201-105, the Board general authority to promulgate rules.

Materials concerning the proposed additions and/or revisions will be available for public inspection during normal working hours starting April 5, 2012, at the following locations and on this website:

Air Pollution Control Division
9th Floor, L & C Annex
401 Church Street
Nashville, TN 37243

Chattanooga – Hamilton County
Air Pollution Control Bureau
6125 Preservation Drive
Chattanooga, TN 37416

Air Pollution Control Division
Cookeville EFO
1221 South Willow Ave.
Cookeville, TN 38506

Air Pollution Control Division
Knoxville EFO
3711 Middlebrook Pk
Knoxville, TN 37921

Air Pollution Control Division
Johnson City EFO
2305 Silverdale Road
Johnson City, TN 37601 - 2162

Air Pollution Control Division
Jackson EFO
1625 Hollywood Drive
Jackson, TN 38305

Air Pollution Control Division
Columbia EFO
1421 Hampshire Pike
Columbia, TN 38401

Knox County Department of
Air Pollution Control
140 Dameron Avenue
Knoxville, TN 37917-6413

Division Air Pollution Control
Memphis - Shelby Co. Health Dept.
814 Jefferson Avenue
Memphis, TN 38105

Air Pollution Control Division
Chattanooga EFO
Suite 550
540 McCallie Ave.
Chattanooga, TN 37402 - 2013

Pollution Control Division
Metropolitan Health Department
311 23rd Ave. North
Nashville, TN 37203

U.S. EPA, Region IV
APTMD - 12th Floor
Atlanta Federal Center
61 Forsyth Street S.W.
Atlanta, Georgia 30303
c/o Mr. Scott R. Davis, Chief

Air Pollution Control Division
Nashville EFO
711 R. S. Gass Blvd.
Nashville, TN 37243

Kingsport Public Library
400 Broad Street
Kingsport, TN 37660

All persons interested in the air quality of the State of Tennessee are urged to attend and will be afforded the opportunity to present testimony to the hearing officer regarding the revisions to the proposed Regional Haze State Implementation Plan (SIP) to protect visibility in Class I areas. Any person desiring to present lengthy comments should be prepared at the hearing to offer a written statement to be incorporated into the record. Written statements not presented at the hearings will only be considered part of the records if received by 4:30 p.m. CDT May 7, 2012, at the office of the Technical Secretary, Tennessee Air Pollution Control Board, 9th Floor L & C Annex, 401 Church Street, Nashville, Tennessee, 37243-1531.

Attachment 3

Public Comment Summary

(Hearing Officer Statement and Public Comments from Eastman Chemical Company, Earth Justice, National Park Service, and EPA)

Hearing Officer Statement

May 7, 2012

Good Morning. I am Quincy Styke III, Deputy Director of the Tennessee Air Pollution Control Division. Today is Monday, May 7, 2012 and the time is 10:00 AM Central. We are in the Tennessee Air Pollution Control Division's Central Office located in the 9th Floor of the L&C Annex at 401 Church Street, Nashville, Tennessee 37243-1531. I call this public hearing to order in the matter of a source specific SIP revision to the Tennessee State Implementation Plan. This hearing is being held under the authority of the Tennessee Air Quality Act and the Tennessee Air Pollution Control Board. The source specific SIP revision will be part of Tennessee's Regional Haze SIP and apply to the B-253 Powerhouse at Eastman Chemical Company in Kingsport, Tennessee.

Notice of the public hearing appeared on the Tennessee Department of Environment and Conservation's web site with a 30 day period for public inspection of the documents applicable to today's public hearing. The notice and the materials in the public depository are being made a part of the hearing record.

The proceedings of this hearing are being recorded and copies of the hearing record will be available for the cost of reproduction. Requests for such copies should be sent to the Technical Secretary at his office. Compilers of the testimony presented at this hearing reserve the right to include extensive or bulky testimony by reference only.

States were required to enact state implementation plans to protect and improve visibility in Class I Areas such as the Great Smoky Mountains National Park with the goal of restoring the visibility levels to natural conditions by 2064. To get a good start in reducing haze producing pollutants, certain existing major sources of visibility impairing pollutants were required to implement Best Available Retrofit Technology or BART to control the pollutants. /The federal statutes and regulations require that BART be implemented as expeditiously as practicable, but no later than 5 years after it has been required. An option known as Alternative BART is possible as long as the reductions in visibility impairing pollutants are greater than BART and that they occur within the first 10 year planning period.

The state of Tennessee submitted its regional haze SIP to EPA in April of 2008 with a source specific permit for the B-253 Powerhouse at Eastman Chemical Company that would activate upon EPA's approval of the Tennessee Regional Haze SIP.

That permit required the installation of post combustion sulfur oxides air pollution control equipment within five years. EPA has not yet acted upon the proposed BART permit for Powerhouse 253, and as such, the timeline to install those controls has not yet been started.

Since the time that the Tennessee Regional Haze SIP has been submitted, EPA has established a very stringent sulfur dioxide one-hour national ambient air quality standard. Ambient air monitoring in the vicinity of the Eastman Chemical Company confirms that this standard is not being attained, and a designation of nonattainment for the area is expected shortly. Preliminary modeling also suggests that BART as originally envisioned may not be enough to attain the ambient sulfur dioxide standard.

Eastman Chemical Company is evaluating the possibility of re-powering the B-253 Powerhouse to natural gas and may also repower other boilers as needed to natural gas to be able to predict attainment of the ambient sulfur dioxide standard. Repowering to natural gas will result in even greater emission reductions of visibility impairing sulfur oxides than BART alone and essentially eliminate them altogether. For that reason, the state of Tennessee is proposing

to establish an alternative BART path at the B-253 Powerhouse of Eastman that provides for re-powering to natural gas.

The current proposed BART permit sent to EPA for inclusion into the Tennessee Regional Haze SIP for the B-253 Powerhouse will be withdrawn for approval by EPA into the Regional Haze SIP for Tennessee and replaced with a new permit that establishes two pathways for Eastman to reduce its visibility impairing pollutants from the Powerhouse. The proposed permit establishes a pathway for BART using the previously submitted post combustion controls that must be completed no later than April 30, 2017 and an alternative BART pathway that requires re-powering the B-253 Powerhouse to natural gas no later than July 31, 2018. Comments have been received that aver the alternative BART deadline to repower should be extended to December 31, 2018. Comments are expected from EPA as part of this hearing, and the state of Tennessee declares that if the EPA is agreeable to extending the deadline to re-power to December 31, 2018, it will be so extended in the final proposed source specific SIP revision permit for EPA's review and approval into the federally approved version of the Tennessee Regional Haze State Implementation Plan.

Tennessee has also received input from Earth Justice, an environmental advocacy group that the proposed permit have a date that requires Eastman to declare early on in the process which path it will pursue. Tennessee will modify the permit to address this concern with new language.

In just a moment, we will begin receiving oral comments and the hearing will be held open as long as is needed for all to comment. I will later recess the oral comment portion of the public hearing and allow the submission of written comments until the close of business at 4:30 PM Central Time today. At that time, the hearing will close. Comments received will be summarized and changes to the proposed permit or its accompanying narrative will be made. The proposed final documents will be presented to the Tennessee Air Pollution Control Board on May 9, 2012 at its regularly scheduled meeting. Upon approval by the Board, the order to retract the previously submitted BART permit for Eastman and its replacement by a new permit that establishes a new BART and a new Alternative BART path will be promptly submitted to EPA for approval and inclusion into the Tennessee Regional Haze SIP.

I will now open the hearing to any oral comments.

(Oral comments received, if any... If there are very few, if any that want to make oral comments, recess until 10:30 AM and go back on the record.)

All Right. I reconvene the hearing to close the oral comment period and declare that the written comment period will continue until 4:30 PM Central time today, May 7, 2012.

Thank You.

Public Hearing Comment Summary

BART & Alternative BART Source Specific SIP Revision Permit For Inclusion Into The Tennessee Regional Haze SIP

Commenter	Comment	TDEC-APC Response
Eastman Chemical Company	Believe that the out date for completion of repowering (if chosen) should be December 31, 2018, not July 31, 2018 as proposed in the permit. Believe that the complexity and enormity of re-powering (if chosen) warrants the maximum amount of time possible to do the project. Clarification sought in the narrative's characterization of alternative BART's emission rate of 0.0006 lb. SO2/MM Btu as illustrative only and not an enforceable limit. Cite that it is merely an AP-42 emission factor derived estimate to compare BART and Alternative BART. Supplemental Comments in a May 7, 2012 1:56 PM Central Time Email from Steve Gossett to Quincy Styke: The first is to clarify that if a boiler is not converted to natural gas by the compliance deadline, it may not be operated on coal after the deadline until the conversion is complete. The second is that, consistent with our initial comments, we believe December 31, 2018 defines the end of the first planning period. If EPA disagrees with that belief, that issue could be opened up for public comment during EPA's SIP approval process.	Comment One: TDEC-APC has researched the issue of July 31,2018 v. December 31, 2018 as being the end date of the first long term planning period of the federal regional haze program. TDEC-APC concludes that there is evidence on both sides for the ending date and that only EPA or the courts can decide what the true end date will be. TDEC-APC does believe that Eastman makes a cogent case for as much time to conduct re-powering (if chosen) as possible due to the many variables that comprise the complexity and enormity of the re-powering project. As such, TDEC-APC has inserted new language into the permit at Condition 4(f)(ii) to state that the out date will be December 31, 2018 or no later than the end of the period of the first long-term strategy for regional haze as determined by EPA, whichever comes first. TDEC-APC is formally requesting that EPA provide final clarity regarding this date in its rulemaking that finalizes its stance on the Eastman BART and BART Alternative Source Specific SIP Revision Permit. If EPA should formally choose a date other than December 31, 2018, it will become the ruling out date. Comment Two: TDEC-APC agrees that the SIP narrative used the value of 0.0006 lb. SO2/MM Btu for illustrative purposes only and is not to be construed as an emission limitation. TDEC-APC directs the reader's attention to Condition 4(b) where construction permit applications are described as being necessary to establish emission limits. The permit, not the narrative itself, is the enforceable component of this action. TDEC-APC also declares that for the purposes of determining if repowering had timely occurred, should a boiler be down for conversion, but not operated until the repowering had been completed, then a timely repowering would be considered to have occurred.

Public Hearing Comment Summary

BART & Alternative BART Source Specific SIP Revision Permit For Inclusion Into The Tennessee Regional Haze SIP

Commenter	Comment	TDEC-APC Response
Earth Justice	Would like to see a declaration from Eastman not later than April 30, 2017 which option it was pursuing to fulfill its visibility impairing pollutant obligations – BART or Alternative BART. Would like to see a requirement that if repowering to natural gas is chosen, construction shall commence not later than April 30, 2017 and repowering shall be completed no later than the earlier of the compliance deadline of the one-hour sulfur dioxide NAAQS or July 31, 2018.	Comment One: TDEC-APC has modified the permit in Condition 4(e) to require that in the event that the repowering option is chosen, construction must commence no later than April 30, 2017 with a thirty day deadline to file notice that the start of construction did occur. Comment Two: TDEC-APC has considered the comments of both Earth Justice and Eastman in arriving at the position of having new language proposed at Condition 4(f)(ii). That language has an out date of December 31, 2018, but it provides that if EPA later determines that less time is available in the first long term strategy period, that amount of time would become the out date given to Eastman to complete the repowering.
Environmental Protection Agency	Expect to act promptly on the SIP amendment when finalized and submitted to the Agency. Will reach a final conclusion regarding the adequacy of the State's submission when it is submitted to them in final form and they complete their public notice and comment rulemaking process.	TDEC-APC concurs with both comments of the Environmental Protection Agency.
National Park Service	Agree with TDEC-APC that the Alternative BART measure proposed for Eastman results in greater progress (than BART) in improving visibility at the Great Smoky Mountains National Park. The long term (after 2018) impact of the repowering to natural gas BART alternative will be lower emissions of sulfur dioxide than the original BART. They commend Eastman for its willingness to act on BART in 2008 and they support the proposed BART Alternative for Eastman now.	TDEC-APC concurs with both comments of the National Park Service.

Eastman Chemical Company
Comments submitted April 23, 2012, and May 7, 2012

EASTMAN

Eastman Chemical Company
P.O. Box 511
Kingsport, Tennessee 37662

April 23, 2012

CERTIFIED MAIL

Mr. Barry Stephens, Technical Secretary
Tennessee Air Pollution Control Board
9th Floor, L&C Annex
401 Church Street
Nashville, Tennessee 37423-1531

Subject: Proposed Amendments to the Tennessee Regional Haze State Implementation Plan

Dear Mr. Stephens:

In response to the notice of public hearing announced by the Tennessee Department of Environment and Conservation on April 4, 2012, Eastman Chemical Company (Eastman) submits the following comments on the proposed amendments to the Tennessee Regional Haze State Implementation Plan (SIP). These amendments propose an alternative Best Available Retrofit Technology (BART) determination for Eastman's Tennessee Operations in Kingsport, Tennessee.

This alternative involves conversion of Eastman's Building 253 coal-fired powerhouse from coal to natural gas. The federal BART regulations allow an alternative measure to be included in a SIP revision pursuant to 40 CFR 51.308(e)(2). According to these regulations, such alternative measure must achieve greater reasonable progress than would be achieved through the installation and operation of BART. Eastman agrees with TDEC's conclusion in the SIP revision that the alternative measure clearly results in greater reductions in the visibility impairing pollutant (sulfur dioxide) than BART, since BART would have reduced the sulfur dioxide emission rate to 0.2 pounds per million Btu of heat input and the alternative measure would reduce the emission rate to essentially zero.

The other important criteria for approval of an alternative measure is that all the reductions take place during the period of the first long-term strategy for regional haze (see 40 CFR 51.308(e)(2)(iii)). TDEC's proposed permit condition defines deadline for completion of the alternative measure as July 31, 2018 and states in the narrative that this date is "within the period of the first long-term strategy." Eastman objects to this deadline as arbitrary and unnecessarily shortening the allowable time for Eastman to complete the project, which clearly provides significantly greater progress in reduction of visibility impairment in Class I Areas.

Eastman finds no basis for this deadline in either guidance, the regional haze regulations or preambles, or the Tennessee Regional Haze SIP. All references we can locate refer to the first planning period as including the year 2018. References we have located are as follows:

- Regional Haze Regulations, Final Rule, 64 Federal Register 35732, July 1, 1999:

  "Hence, in identifying the amount of progress needed between the baseline and the end of the implementation period (i.e., the year 2018)..."

- Regional Haze State Implementation Plan for Tennessee Class I Areas, dated April 4, 2008. Section 7.0 of this plan describes the long-term strategy:

  "This first set of reasonable progress goals must be met through measures contained in the state's long-term strategy covering the period from the baseline until 2018.

- The regional haze SIP proposed and final actions EPA has been taking all define the planning periods as 10 year periods starting 20014 and ending in 2064, with the first period including the calendar years 2009 through 2018.

- The proposed rule approving Colorado's regional haze SIP revision included an alternative program that achieves greater reasonable progress than BART. When addressing the requirement that all emission reductions take place during the first planning period, EPA states:

  "Pursuant to 40 CFR 51.308(e)(2)(iii), Table 25 shows that all controls under the BART alternative will occur by December 17, 2017, ***within the first planning period, which ends in December 2018.*** *" (emphasis added)*

Therefore, we believe it is clear that the first planning period ends December 31, 2018. We request the deadline for completion of the emission reductions from implementing the alternative measure be changed from July 31, 2018 to December 31, 2018.

In addition to the plain language above indicating EPA intended the first planning period to end on December 31, 2018, there are additional justifications for granting Eastman the maximum time allowed under the rule. First and foremost, the potential change from coal to natural gas at Building 253 powerhouse represents a fundamental strategic change for Eastman with far-reaching implications. Eastman began using coal as a source of energy at the Kingsport site in custom-designed boilers in 1929, and has reinvested in its coal-based energy infrastructure ever since. Migrating approximately half the Kingsport site's energy portfolio from coal to natural gas after over 80 years of reliable and cost-effective service represents a major strategic change for Eastman. Such far-reaching decisions can only be made by Eastman's Board of Directors, and the fiduciary responsibility of the Board requires that any such decision undergo considerable scrutiny and analysis. This level of scrutiny requires time, and the interests of making a good decision argues for the maximum flexibility allowed under the regulations.

Second, the technical complexity of converting coal boilers to fire natural gas cannot be overstated. The five boilers at Building 253 were custom engineered to burn a specific grade of bituminous coal. The original designers have been engaged to evaluate whether it is technically feasible to convert the boilers to fire natural gas, but none of the detailed engineering required for such a modification has been performed. This means that Eastman has a basis for believing that the boilers can be converted to fire natural gas, but has very little visibility about the extent of technical modifications required to effect such a conversion. Changes to how heat is distributed throughout the boilers, circulation patterns, load response, and basic unit performance are all unquantified. Physical changes to boiler metallurgy, attemperating water systems, and to remain current with NFPA fire codes are all unquantified. And the commissioning, checkout and requirements for tuning of the combustion control systems and the flame safety and stability systems are unquantified. None of these hurdles appear to be insurmountable, but the considerable technical risks can only be addressed through detailed engineering up front, and a disciplined checkout and commissioning process after the first unit is converted. Addressing these

technical risks requires time in order to ensure that what is learned from the first unit to undergo such a conversion can be incorporated into the design and checkout of the subsequent four units. This will ensure that the potential conversion of any of these boilers is not only good for the environment, but is also good business risk for Eastman and that the unit is safe for plant personnel to operate.

Third, one of the most critical success factors for a potential conversion is completely beyond Eastman's control. Shifting approximately half of the Kingsport site's energy infrastructure to natural gas requires a major expansion to many miles of interstate pipeline. Expanding interstate gas pipelines is regulated by the Federal Energy Regulatory Commission (FERC), which has a rigid public process to ensure the interests of the public are protected. The FERC process has to be followed to its conclusion before the owner of the pipeline can set the cost charged to Eastman for expanding the pipeline. If Eastman concludes that the cost is reasonable and supports the business case for converting to natural gas, only then will the pipeline owner begin the project to engineer and physically modify the pipeline to carry the additional volume of gas. Eastman made broad assumptions about the duration of the FERC approval process and the pipeline engineering and construction when it concluded that converting coal fired boilers to fire natural gas was feasible within the first Regional Haze planning period. But it is well known that Eastman is not the only company considering changes that will require expansions to interstate pipelines, and these changes could impact the timing of pipeline expansions to support the Kingsport site. For example, American Electric Power recently announced its intent to convert portions of its Clinch River Plant in Cleveland, Virginia (approximately 50 miles from Kingsport, and fed from the same interstate pipeline that services Kingsport), from coal to Natural Gas[1]. The timing of the FERC process, the pipeline owner's engineering and construction process, or the influence of other companies could impact the date that natural gas is available to Eastman in Kingsport. Because none of these factors can be known with certainty, each introduces both cost and schedule risk. Yet despite the fact that the FERC and pipeline owner's processes are outside Eastman's control, only Eastman stands to be held accountable if it takes longer to deliver the required volume of natural gas to the Kingsport site than Eastman currently assumes. Mitigating this business risk by setting a December 31, 2018, deadline is both reasonable and within the state of Tennessee's authority.

Lastly, one additional minor comment is that Eastman requests the SIP revision narrative clarify in Table 1 that the emission rate shown for alternative BART (0.0006 lb/MMBtu) is not to be construed to represent an enforceable emission limit. The amount of sulfur present in natural gas is insignificant, but it is not controlled by the producers of the gas nor by the pipeline companies that transport the gas. The figure cited above is simply the emission rate shown for natural gas boilers in EPA's Emission Factor document (AP-42 5th Edition, Table 1.4-2). This value was given by Eastman to simply illustrate that sulfur dioxide emissions from natural gas combustion will be far lower than from post-combustion SO2 controls on coal-fired boilers, and should not be used as the basis for establishing a numerical limit.

If you have any questions concerning these comments, please contact me at (423)229-2327.

Sincerely,

Stephen R. Gossett, P.E.
Environmental Fellow

[1] AEP Shares Plan For Compliance With Proposed EPA Regulations, June 9, 2011, http://www.aep.com/newsroom/newsreleases/?id=1697

From: Gossett, Stephen R [mailto:srgosset@eastman.com]
Sent: Monday, May 07, 2012 1:56 PM
To: Quincy Styke; 'Benjamin.Lynorae@epamail.epa.gov'
Cc: Travis Blake; Barry Stephens; Lacey Hardin; Sago, Brett A.
Subject: BART Alternative - Supplemental Eastman Comments

Please accept this email as supplemental Eastman comments.

First, I have attached marked up revisions to the latest TDEC draft permit language. Two issues are addressed.

The first is to clarify that if a boiler is not converted to natural gas by the compliance deadline, it may not be operated on coal after the deadline until the conversion is complete.

The second is that, consistent with our initial comments, we believe December 31, 2018 defines the end of the first planning period. If EPA disagrees with that belief, that issue could be opened up for public comment during EPA's SIP approval process.

(b) The permittee shall submit applications for any construction permit(s) as needed to establish emission limits and other applicable requirements to repower the boilers.

(c) If the permittee determines that Alternative BART is not feasible for this facility, the permittee shall provide written notification to the Technical Secretary and the EPA Region 4 Office in a final quarterly report. Upon submittal of this notification, the permittee shall comply with **Conditions 1 and 2** of this permit no later than April 30, 2017.

(d) The permittee is placed on notice that the issuance of this permit does not excuse it from any other applicable air pollution control requirements that may become applicable as a result of re-powering to natural gas.

(e) If the permittee elects to repower its B-253 Powerhouse boilers to natural gas, the permittee shall begin actual construction (as defined in Rule 1200-03-09-.01(4) of the Tennessee Air Pollution Control Regulations) on the conversion no later than April 30, 2017. The permittee shall provide written notice to the Technical Secretary no later than thirty (30) days following the start of actual construction.

(~~e~~f) If the permittee elects to repower its B-253 Powerhouse boilers to natural gas, the conversion shall be accomplished (or else an unconverted boiler not operated until converted) no later than the earlier of:

(i) The compliance deadline for the one-hour sulfur dioxide NAAQS, or

(ii) ~~July 31, 2018, or (if a later date is approved by U. S. EPA) no later than the end of the period of the first long-term strategy for regional haze.~~The end of the period of the first long term strategy for regional haze: December 31, 2018

4~~5~~. This permit contains requirements that Eastman Chemical Company must meet in addition to the requirements of Title V Operating Permit 557888.

5~~6~~. This permit shall remain valid until Title V Operating Permit 557888 is reopened to include the requirements of this permit.

(end of conditions)

Earth Justice
Comments submitted April 23, 2012 (via EPA)
and May 7, 2012

Travis Blake

From: Lacey Hardin
Sent: Monday, May 14, 2012 7:54 AM
To: Travis Blake
Subject: FW: Comments from the Litigants on Proposed Tennessee Regional Haze SIP

Importance: High

From: Quincy Styke
Sent: Wednesday, April 25, 2012 9:20 AM
To: Travis Blake; Lacey Hardin; Gosset, Steve
Cc: Quincy Styke
Subject: FW: Comments from the Litigants on Proposed Tennessee Regional Haze SIP
Importance: High

I'm going to be in an all day meeting. Look these over and see what changes we would be likely to make in response to the comments. Maybe we could chat late this afternoon....

Quincy III

From: Lynorae Benjamin [Benjamin.Lynorae@epamail.epa.gov]
Sent: Monday, April 23, 2012 6:10 PM
To: Barry Stephens; Quincy Styke
Cc: Davis.ScottR@epamail.epa.gov; Notarianni.Michele@epamail.epa.gov; Calcagni.John@epamail.epa.gov; Sean Lakeman
Subject: Comments from the Litigants on Proposed Tennessee Regional Haze SIP

Hello Barry and Quincy,

Please see message below from NCPA on the proposed TN Regional Haze SIP.... May 15, 2012 is approaching quickly and we will need to have resolution no later than around May 1, 2012 to get the extension process. We can discuss more this week. We wanted to get these to you as quickly as we got them so that you can review and see what you will likely get in the way of comments on your proposal.

I hope your day is going well.

Lynorae Benjamin, Chief
Regulatory Development Section
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
phone: 404-562-9040
facsimile: 404-562-9019

David Baron wrote the following...

The state copied us on the attached drafts of the SIP revision for the Eastman plant in Tennessee. We have the following concerns with this proposal:

1. The SIP narrative (p.9) indicates that, under the option of repowering to gas, the 4 boilers at issue will be converted to gas in sequence by different dates in 2016, 2017 and 2018. However, the draft permit sets only an outside deadline for completing conversion of all 4. The permit should have separate deadlines for completion of each boiler conversion corresponding to the time frames shown in Table 2 of the SIP revision. Sequential deadlines are particularly important given that the final deadline (July 2018) is more than a year past the original BART deadline of April 2017.
2. The draft permit is written in confusing fashion that does not set out Eastman's obligations with sufficient clarity. Condition '3' says that Eastman must comply with Conditions 1 and 2 except as otherwise allowed by Condition 4 (The draft

permit actually has two Condition 4's – I assume here the intent was to reference the first of these). But no where does Condition 4 expressly require Eastman to elect one option or the other by a date certain. Condition 4(c) merely says that "if" the permittee determines that the repowering option is not feasible, it shall submit written notification to the state and EPA, and upon that submission the permittee shall comply with the original BART by 7-30-17. Condition 4(e) says that "if" the permittee elects to repower its B-253 Powerhouse boilers to natural gas, the conversion shall be done by the deadlines specified. These provisions don't require Eastman to make any election at all, much less set a deadline for doing so. The only action that Eastman has to take under Condition 4 – absent election of one option or the other - is submit reports. This is unacceptable. The permit or other SIP provisions must require in explicit, unambiguous, and legally enforceable terms that Eastman must implement one option or the other by the relevant deadlines, and must notify the state and EPA of its election by a date certain deadline. Given that the modeling exercise is supposed to take no more than year, a logical deadline for making the election would be no later than July 1, 2013 – a year after the first progress report.

The above concerns need to be addressed in order for us to accept an extension to November for final action on BART for this facility. Any thoughts on how best to deal with these issues?

From: David Baron [dbaron@earthjustice.org]
Sent: Monday, May 07, 2012 9:08 AM
To: Quincy Styke
Cc: anderson.lea@epa.gov; Vera Kornylak (Kornylak.Vera@epamail.epa.gov); Eric Triplett (Triplett.Eric@epamail.epa.gov)
Subject: Eastman

Mr. Styke,

Attached are edits to the draft Eastman permit to address our concerns, consistent with the discussion last Thursday. With these changes, the proposed SIP revision (April 4, 2012) would be an acceptable compromise for our clients.

Let me know if you have questions about this approach. Feel free to share this draft with Eastman and other interested parties.

David Baron

David Baron
Managing Attorney
Earthjustice
1625 Massachusetts Avenue, NW, Suite 702
Washington, DC 20036
(202) 667-4500 Ext. 5203 (phone)
(202) 667-2356 (fax)
dbaron@earthjustice.org <mailto:dbaron@earthjustice.org>

Amendments to paragraphs 4(c) and 4(e) of draft Eastman permit: Alternative BART SIP proposal dated April 4, 2012

(c) ~~If the permittee determines that Alternative BART is not feasible for this facility,~~ Not later than April 30, 2017, the permittee shall provide written notification to the Technical Secretary and the EPA Region 4 Office stating either that the permittee has elected to repower its B-253 Powerhouse boilers to natural gas or that the permittee has not elected such repowering.. ~~in a final quarterly report~~. ~~Upon submittal of this notification~~ If the permittee has not elected such repowering, the permittee shall comply with **Conditions 1 and 2** of this permit no later than April 30, 2017.

(e) If the permittee elects to repower its B-253 Powerhouse boilers to natural gas, construction for the conversion shall commence not later than April 30, 2017, and repowering of all boilers to natural gas shall be completed~~be accomplished~~ no later than the earlier of:

(i) The compliance deadline for the one-hour sulfur dioxide NAAQS established in an approved State Implantation Plan revision, or

(ii) July 31, 2018

EPA Comments

UNITED STATES ENVIRONMENTAL PROTECTION AGE CY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

May 7, 2012

Robert J. Martineau
Commissioner
Tennessee Department of
Environment and Conservation
401 Church Street
L&C Annex, 1st Floor
Nashville, Tennessee 37243

Dear Mr. Martineau:

The U.S. Environmental Protection Agency has completed a preliminary review of the Tennessee Department of Environmental Conservation's (TDEC's) proposed amendment to the State's regional haze state implementation plan (SIP), as received via email from Mr. Barry Stephens on April 4, 2012. The amendment would establish an alternative emission reduction measure to best available retrofit technology (BART) for Eastman Chemical Company's B-253 Powerhouse in Kingsport, Tennessee. The deadline for filing written comments on this BART alternative proposal is May 7, 2012.

The EPA acknowledges and appreciates the State's efforts in promoting and developing approaches that seek to achieve greater reasonable progress toward the national visibility goal than would be achieved through the installation and operation of BART. The EPA expects to act promptly on this SIP amendment once it is finalized and formally submitted to the Agency.

The EPA will reach a final conclusion regarding the adequacy of the State's amended regional haze SIP once the Agency reviews the final submission and completes our public notice and comment rulemaking process. We look forward to continued collaboration with you and your staff to improve visibility in the nation's Class I national parks and wilderness areas. Please do not hesitate to contact me or Beverly Banister at (404) 562-9070 if you have any questions.

Sincerely,

A. Stanley Meiburg
Deputy Regional Administrator

cc: Barry R. Stephens, TDEC

National Park Service Comments

Travis Blake

From: Lacey Hardin
Sent: Monday, May 14, 2012 7:51 AM
To: Travis Blake
Subject: FW: Proposed Revisions to Tennessee's Regional Haze SIP

-----Original Message-----
From: Patricia F Brewer@nps.gov [mailto:Patricia F Brewer@nps.gov]
Sent: Wednesday, April 18, 2012 9:48 AM
To: Barry Stephens; Quincy Styke; Lacey Hardin
Cc: 'baanderson02@fs.fed.us'; Benjamin.Lynorae@epamail.epa.gov; 'Don_Shepherd@nps.gov'; Haidar Alrawi; 'Tim_Allen@fws.gov'; Susan Johnson@nps.gov
Subject: Re: Proposed Revisions to Tennessee's Regional Haze SIP

Barry and Quincy,

I have reviewed the attached documents on Tennessee Eastman. National Park Service concurs with Tennessee Eastman's proposal to investigate switch to natural gas as BART alternative. We understand the schedule implications.

Tennessee Eastman stepped forward in 2007-2008 to accept BART controls.
We want to work with good neighbors to achieve visibility improvements.

Let me know if you have questions. If you prefer a more formal letter in response to your request for review, we can do that; just let me know.

Good talking to you,

Pat Brewer

Pat Brewer
National Park Service
Air Resource Division
303-969-2153

Lacey Hardin
<Lacey.Hardin@tn.gov>

04/04/2012 04:13 PM

To
"'baanderson02@fs.fed.us'" <baanderson02@fs.fed.us>,
"'Patricia_F_Brewer@nps.gov'" <Patricia F Brewer@nps.gov>,
"'Tim_Allen@fws.gov'" <Tim_Allen@fws.gov>,
"'Don_Shepherd@nps.gov'" <Don_Shepherd@nps.gov>

cc
"Benjamin.Lynorae@epamail.epa.gov" <Benjamin.Lynorae@epamail.epa.gov>,
Haidar Alrawi

<Haidar.Alrawi@tn.gov>, Barry Stephens <Barry.Stephens@tn.gov>, Quincy Styke <Quincy.Styke@tn.gov>

Subject
Proposed Revisions to Tennessee's Regional Haze SIP

All,

Please find attached the proposed revisions to Tennessee's Regional Haze SIP for your review and comment. The public comment period begins April 5 and ends May7. Please feel free to contact Quincy Styke, Haidar Alrawi, or me at 615-532-0554 if you have any questions.

Lacey Hardin
Assistant Director
Tennessee Department of Environment and Conservation Division of Air Pollution Control[attachment "Public Notice.docx" deleted by Patricia F Brewer/DENVER/NPS] [attachment "Regional Haze Alternative BART_Eastman_4-4-12.pdf" deleted by Patricia F Brewer/DENVER/NPS]

United States Department of the Interior

NATIONAL PARK SERVICE
Air Resources Division
P.O. Box 25287
Denver, CO 80225-0287

May 4, 2012

Barry Stephens, Director
Air Pollution Control Division
Tennessee Department of Environment and Conservation
9th Floor, L & C Annex
401 Church Street
Nashville, TN 37243

Dear Mr. Stephens:

The National Park Service (NPS) has reviewed the Tennessee Department of Environment and Conservation (TDEC)'s proposed alternative for Best Available Retrofit Technology (BART) for Eastman Chemical Company and supports TDEC's conclusion that the alternative BART measure would result in greater progress in improving visibility at Great Smoky Mountains National Park.

In 2008, TDEC determined that a sulfur dioxide emissions limit of 0.2 lb/mmBtu is BART for the five coal-fired boilers at Eastman's B-253 Powerhouse. TDEC now proposes to retain this emissions limit if Eastman continues to burn coal and to modify the permit to allow Eastman a BART alternative to repower the coal-fired boilers with natural gas with an effective sulfur dioxide emissions rate of 0.0006 lb/mmBtu. Because natural gas has little sulfur content, the alternative would accomplish greater reductions in sulfur dioxide emissions than the original BART determination. Due to uncertainty in siting and sizing a natural gas pipeline, TDEC is proposing to allow an additional year, to July 31, 2018, if Eastman chooses to implement the BART alternative.

Every year after 2018, sulfur dioxide emissions will be lower under the BART alternative than under the original BART. Eastman Chemical Company was one of the first industrial sources nationally to agree to emissions reductions for BART. We commend Eastman's willingness to act in 2008 and we support TDEC's proposed BART alternative for Eastman now.

We appreciate the opportunity to work closely with TDEC and the U.S. Environmental Protection Agency to make progress toward achieving natural visibility conditions at our National Parks and Wilderness Areas.

We appreciate the opportunity to work closely with TDEC and the U.S. Environmental Protection Agency to make progress toward achieving natural visibility conditions at our National Parks and Wilderness Areas. For further information regarding our comments, please contact Pat Brewer at (303) 969-2153.

Sincerely,

Susan Johnson
Chief, Policy, Planning, and Permit Review Branch

cc:
Beverly Banister, Director
Air, Pesticides, and Toxics Management Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Attachment 4

BART Permit 066116H

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: May 9, 2012

Permit Number: 066116H

Date Expires: December 31, 2018

Issued To:

Eastman Chemical Company
Tennessee Operations
(MSOP-02)

Installation Address:

South Eastman Road
Kingsport

Installation Description:

Powerhouse B-253-1, Boilers #25-#29

Emission Source Reference No.

82-0003-00
BART

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. In accordance with the requirements of 40 CFR 51.308 (BART), the following emission limitation is established:

   Sulfur dioxide (SO_2) emissions from Boilers 25-29 shall comply with the less stringent of the following limits:

   (a) 0.20 pounds of SO_2 per million British Thermal Units (lb/MMBtu) of heat input; or

   (b) Reduce uncontrolled SO_2 emissions by 92%.

   Compliance with these emission limits shall be determined on a thirty (30) calendar day rolling average basis as the average emission rate, or average SO_2 reduction, from either each boiler individually while combusting coal, or averaged across all of the boilers that are combusting coal.

(conditions continued on next page)

Barry R. Stephens
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. **Monitoring Requirements**:

Measurement of SO_2 emissions: SO_2 emissions shall be measured through the use of continuous in-stack monitoring for sulfur dioxide, as specified below:

The source owner or operator shall install, maintain, operate, and submit quarterly reports of excess emissions and sulfur dioxide (SO_2) removal efficiency (if applicable) from continuous in-stack monitoring systems for sulfur dioxide (SO_2). The sulfur dioxide monitoring systems shall meet all the requirements of 40 CFR 60 Appendices A and B, or 40 CFR Part 75 Appendices A and F.

Compliance will be determined on a 30 calendar day rolling average basis. Each 30 calendar day average shall be the average of the valid daily averages during the previous thirty (30) calendar days

Operational requirements for Sulfur Dioxide (SO_2) Monitoring Systems: For this fuel burning installation to demonstrate continual compliance with the BART sulfur dioxide emission limitation, each sulfur dioxide monitoring system for boilers #25-#29 shall be fully operational for at least ninety five percent (95%) of the operational time (during which coal is combusted) of the monitored units during each calendar quarter. Operational availability levels of less than these amounts may be considered the basis for declaring the fuel burning installation in noncompliance with the applicable monitoring requirements, unless the reasons for the failure to maintain these levels of operational availability are accepted by the Technical Secretary as being legitimate malfunctions of the instruments. Data recorded during periods of monitoring system breakdown, repairs, calibration checks, and zero and span adjustments shall not be included in the data averages.

Quality Assurance requirements for the Sulfur Dioxide (SO_2) Monitoring Systems: The continuous in-stack sulfur dioxide monitoring systems shall meet all of the requirements of 40 CFR Part 60 Appendix B (Performance Specification 2) and 40 CFR Part 60 Appendix F; or 40 CFR Part 75 Appendices A and B.

Monitoring Plan: Monitoring shall be conducted as specified in an approved site-specific monitoring plan. The monitoring plan must be submitted to the Technical Secretary at least ninety (90) days prior to the startup of the control device.

Recordkeeping: All records required to demonstrate compliance with this condition shall be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. Records shall be maintained for five (5) years.

3. **Compliance Schedule:** Except as otherwise allowed by **Condition 4** of this permit, Eastman Chemical Company shall comply with **Conditions 1 and 2** of this permit no later than April 30, 2017.

4. **Alternative BART Requirements**: In lieu of complying with BART as specified in **Conditions 1, 2, and 3** of this permit, the permittee may choose to implement Alternative BART, as follows:

(a) The permittee shall submit written quarterly progress reports to the Technical Secretary and to the U. S. Environmental Protection Agency (EPA), Region 4 Office. The initial report shall be submitted no later than July 1, 2012. Subsequent reports shall be submitted within one calendar quarter of the previous report.

(i) The reports shall summarize the permittee's acquisition of site-specific meteorological data at the permittee's Kingsport Meadowview site and the modeling results obtained from the data. Only the modeling analyses that are used to determine whether the BART requirements specified in **Conditions 1 and 2** of this permit will be sufficient to attain and maintain the one hour sulfur dioxide NAAQS need be addressed in the submittals. If the permittee concludes that compliance with **Conditions 1 and 2** of this permit are not sufficient to demonstrate attainment and maintenance of the one hour sulfur dioxide NAAQS, the permittee shall include summaries of modeling results showing the predicted ambient impacts of repowering the B-253 Powerhouse to natural gas (and other boilers at the facility, if needed to comply with the one hour sulfur dioxide NAAQS) with the quarterly progress reports.

(ii) If the permittee determines to repower its boilers at its Kingsport, Tennessee facility, the quarterly written report submitted according to the schedule in **Condition 4(a)** shall contact the natural gas supplier for the area and summarize what the permittee knows regarding the progress on the project to modify the third-party natural gas pipeline to provide sufficient natural gas to the permittee's facility.

(b) The permittee shall submit applications for any construction permit(s) as needed to establish emission limits and other applicable requirements to repower the boilers.

(c) If the permittee determines that Alternative BART is not feasible for this facility, the permittee shall provide written notification to the Technical Secretary and the EPA Region 4 Office in a final quarterly report. Upon submittal of this notification, the permittee shall comply with **Conditions 1 and 2** of this permit no later than April 30, 2017.

(d) The permittee is placed on notice that the issuance of this permit does not excuse it from any other applicable air pollution control requirements that may become applicable as a result of repowering to natural gas.

(e) If the permittee elects to repower its B-253 Powerhouse boilers to natural gas, the permittee shall begin actual construction (as defined in Rule 1200-03-09-.01(4) of the Tennessee Air Pollution Control Regulations) on the conversion no later than April 30, 2017. The permittee shall provide written notice to the Technical Secretary no later than thirty (30) days following the start of actual construction.

(f) If the permittee elects to repower its B-253 Powerhouse boilers to natural gas, the conversion shall be accomplished (or else an unconverted boiler not operated until converted) no later than the earlier of:

(i) The compliance deadline for the one-hour sulfur dioxide NAAQS, or

(ii) December 31, 2018, or the end of the period of the first long term strategy for regional haze as determined by U. S. EPA, whichever is earlier.

5. This permit contains requirements that Eastman Chemical Company must meet in addition to the requirements of Title V Operating Permit 557888.

6. This permit shall remain valid until Title V Operating Permit 557888 is reopened to include the requirements of this permit.

(end of conditions)

Attachment 5

Board Order 12-008

STATE OF TENNESSEE
AIR POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	
STATE IMPLEMENTATION PLAN APPROVAL	)	ORDER NO. 12-008
REGIONAL HAZE – CLASS I VISIBILITY IMPAIRMENT	)	

BOARD ORDER

Regional haze is pollution that impairs visibility over a large region, including national parks, forests, and wilderness areas (Class I areas). Regional haze is caused by sources and activities emitting fine particles and precursors such as SO_2, which affect visibility through the scattering and absorption of light and may be transported over long distances. Reducing fine particles in the atmosphere is an effective method of improving visibility. In the southeast, the most important sources of haze-forming emissions are coal-fired power plants, industrial boilers and other combustion sources.

40 CFR §51.308(e) requires affected States to submit an implementation plan containing emission limitations and schedules for compliance representing Best Available Retrofit Technology (BART) for each BART-eligible source that may reasonably be anticipated to cause or contribute to any impairment of visibility in any mandatory Class I Federal area. To address the requirements for BART, the State must submit an implementation plan containing the plan elements specified in §51.308(e)(1) and include documentation for all required analyses. Affected sources are required to install and operate BART no later than five years after approval of the implementation plan revision. On April 4, 2008, the Board approved the *Regional Haze State Implementation Plan for Tennessee Class I Areas*, including BART requirements for Eastman Chemical Company, for submittal to U. S. EPA for adoption into Tennessee's State Implementation Plan.

Pursuant to §51.308(e), States may opt to implement alternatives to BART, provided that the alternative measure must achieve greater reasonable progress than would be achieved through the installation and operation of BART. For such alternative measures, the State must submit an implementation plan containing the plan elements specified in §51.308(e)(2) and include documentation for all required analyses. All required emission reductions that are required pursuant to §51.308(e)(2) must take place during the period of the first long-term strategy for regional haze.

Upon recommendation by the staff for approval, the Board finds that the *Alternative BART Determination for Eastman Chemical Company – Tennessee Operations* includes a compliance option that meets the requirements of §51.308(e)(1) for BART and an option that meets the requirements of §51.308(e)(2) for alternative measures. The Board approves the withdrawal of operating permit 061873H (BART permit for Eastman Chemical Company issued March 31, 2008). The Board approves the submittal of the *Alternative BART Determination for Eastman Chemical Company – Tennessee Operations* and operating permit 066116H (BART permit for Eastman Chemical Company issued May 9, 2012) to U. S. EPA for adoption into Tennessee's State Implementation Plan.

Approved on May 9, 2012, by the members of the Tennessee Air Pollution Control Board as follows:

STATE OF TENNESSEE
AIR POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	
PROPOSED STATE IMPLEMENTATION PLAN AMENDMENTS TO REQUEST REDESIGNATION OF THE KNOXVILLE 1997 ANNUAL PM2.5 NONATTAINMENT AREAS TO ATTAINMENT	)	ORDER NO. 16-0232

BOARD ORDER

The Tennessee Air Pollution Control Board finds that the annual fine particulate matter ($PM_{2.5}$) air quality measurements in the Knoxville, TN nonattainment area show compliance with the 1997 annual $PM_{2.5}$ National Ambient Air Quality Standard for the 2013-2015 monitoring period. The Board further finds that these measurements warrant a request for EPA to approve and formally amend the Tennessee State Implementation Plan to bring about a federal redesignation of the area from nonattainment to attainment of the 1997 annual National Ambient Air Quality Standard for fine particulate matter ($PM_{2.5}$).

Approved on December 14, 2016, by the members of the Tennessee Air Pollution Control Board as follows:

Appendix L
Permit Conditions for Proposed Incorporation into the Tennessee SIP

E3-4. Particulate matter emitted from this fuel burning installation shall not exceed 0.030 pounds per million British Thermal Units (lb/MMBtu) of heat input.

Compliance Method: Compliance with this condition shall be assured as follows:

(a) The permittee shall perform stack testing of this fuel burning source to demonstrate compliance with the applicable particulate emissions limits. Testing shall be performed every calendar year, and a particulate source test report shall be filed with the Technical Secretary within 45 days after completion of the testing. Ten (10) days prior to conducting the source test, the permittee shall provide notice of such test to the Technical Secretary to afford him the opportunity to have an observer present. Testing shall be conducted in accordance with TAPCR 1200-03-12 and 40 CFR 60, Appendix A, Method 5 **and** ensuring that the front half filter temperature shall be 160° ±14 °C (320° ±25 °F). TVA shall calculate the PM emission rate from the stack test results in accordance with 40 CFR 60.8(f). The continuous in-duct opacity monitor(s) shall be fully operational prior to and during the performance test. The opacity data generated during this compliance testing shall be incorporated into the test report. Stack testing performed as part of an annual relative response audit (RRA) under 40 CFR 63 UUUUU shall be considered to satisfy this requirement.

(b) *This sub-condition is not proposed for incorporation into the SIP.*

(c) *This sub-condition is not proposed for incorporation into the SIP.*

(d) Beginning June 13, 2011 and continuing thereafter, the permittee shall continuously operate (as defined by Paragraph 15 of the Consent Decree) the PM Control Device. TVA shall, at a minimum, to the extent reasonably practicable and consistent with manufacturers' specifications, the operational design of the Unit, and good engineering practices,

1. Fully energize each section of the ESP;

2. Operate automatic control systems on the ESP to maximize PM collection efficiency; and

3. Maintain power levels delivered to the ESP as needed to maximize collection efficiency.

TVA must complete and submit all PM emission control optimization studies according to the schedule dictated by Paragraph 99 the Consent Decree.

(e) No later than twelve (12) months after the date that EPA approves the plan for installation and correlation of the PM CEMS and the QA/QC protocol, as specified in the Consent Decree, the permittee shall install, correlate, maintain, and operate PM continuous emission monitoring systems (CEMS) as specified below. Each PM CEMS shall comprise a continuous particle mass monitor measuring PM concentration, directly or indirectly, on an hourly average basis and a diluent monitor used to convert the concentration to units of lb/MMBtu. The PM CEMS installed at each stack must be appropriate for the anticipated stack conditions. The permittee shall maintain, in an electronic database, the hourly average emission values produced by each PM CEMS in lb/MMBtu. Except for periods of monitor malfunction, maintenance, or repair, the permittee shall continuously operate the PM CEMS at all times when at least one Unit it serves is operating.

No later than ninety (90) days after the permittee begins operation of the PM CEMS, the permittee shall conduct tests of each PM CEMS to demonstrate compliance with the PM CEMS installation and correlation plan(s) and QA/QC protocol(s). Within forty-five (45) days of each such test, the permittee shall submit the results to EPA, the States, and the Citizen Plaintiffs pursuant to Section VIII (Notices) of the Consent Decree. Following the installation of the PM CEMS, the Permittee shall begin and continue to report the data recorded by the PM CEMS, expressed in lb/MMBtu on a 3-hour rolling average basis and a 24-hour rolling average basis in electronic format to EPA, the States, and the Citizen Plaintiffs including identification of each 3-hour average and 24-hour average above the applicable PM Emission Rate for the unit. Upon termination of the Consent Decree, or the applicable provisions therein, test results shall be submitted to the Technical Secretary; submittal to EPA and the Citizen Plaintiffs will no longer be required by this permit upon termination of the Consent Decree.

TAPCR 1200-03-05-.02(2)(d), 1200-03-06-.02(1), 1200-03-09-.02(11)(e)1.(iii), Consent Decree

E3-15. Continuous Operation of NO_X and SO_2 Control Equipment

Beginning June 13, 2011 and continuing thereafter, the permittee shall continuously operate any pollution control technology or combustion control (including, but not limited to, SCR, FGD, PM Control Device, SNCR, Low NO_x Burner (LNB), Overfire Air (OFA) or Separated Overfire Air (SOFA)) at all times such Unit is in operation, except during a Malfunction that is determined to be a Force Majeure Event as defined by the Consent Decree. This continuous operation serves to minimize emissions to the greatest extent technically practicable consistent with the technological limitations, manufacturers' specifications, fire prevention codes, and good engineering and maintenance practices for such pollution control technology or combustion control and the Unit. This condition specifically applies to such equipment as the installed SCR and Wet FGD for NO_X and SO_2 emissions control at the Bull Run Fossil Plant.

TAPCR 1200-03-09-.03(8), Consent Decree

E3-16. Compliance with System-Wide Annual NO_X and SO_2 Tonnage Limits

During each calendar year all Units in the TVA System and any New CC/CT Units constructed pursuant to Paragraph 117 of the Consent Decree, collectively, shall not emit NO_X or SO_2 in excess of the System-Wide Annual Tonnage Limitations found in paragraphs 67-68 and 82-84 of the Consent Decree.

Compliance Method: In accordance with 40 CFR 75, TVA shall use CEMS to monitor emissions of NO_X and SO_2 to demonstrate compliance with the System-Wide Annual Tonnage Limitations.

TAPCR 1200-03-09-.03(8), Consent Decree

Specified Permit Limits and Conditions for TVA Kingston Fossil Plant

E3-4. Particulate matter emitted from this fuel burning installation shall not exceed 0.030 pounds per million British Thermal Units (lb/MMBtu) of heat input as determined by stack testing in accordance with TAPCR 1200-03-12 and 40 CFR 60, Appendix A, Method 5 and ensuring that the front half filter temperature shall be 160° ±14 °C (320° ±25 °F).

Compliance Method: Compliance with this condition shall be assured as follows:

(a) The permittee shall perform stack testing of this fuel burning source to demonstrate compliance with the applicable particulate emissions limits. Testing shall be performed every calendar year, and a particulate source test report shall be filed with the Technical Secretary within 45 days after completion of the testing. Ten (10) days prior to conducting the source test, the permittee shall provide notice of such test to the Technical Secretary to afford him the opportunity to have an observer present. Testing of wet stacks shall be conducted in accordance with TAPCR 1200-03-12 and 40 CFR 60, Appendix A, Method 5 **and** ensuring that the front half filter temperature shall be 160° ±14 °C (320° ±25 °F). TVA shall calculate the PM emission rate from the stack test results in accordance with 40 CFR 60.8(f). The continuous in-duct opacity monitor(s) shall be fully operational prior to and during the performance test. The opacity data generated during this compliance testing shall be incorporated into the test report. Stack testing performed as part of an annual relative response audit (RRA) under 40 CFR 63 UUUUU shall be considered to satisfy this requirement.

(b) *This sub-condition is not proposed for incorporation into the SIP.*

(c) *This sub-condition is not proposed for incorporation into the SIP.*

(d) Beginning June 13, 2011 and continuing thereafter, the permittee shall continuously operate (as defined by Paragraph 15 of the Consent Decree) each PM Control Device on each Unit. TVA shall, at a minimum, to the extent reasonably practicable and consistent with manufacturers' specifications, the operational design of the Unit, and good engineering practices,

1. Fully energize each section of the ESP for each Unit;

2. Operate automatic control systems on each ESP to maximize PM collection efficiency; and

3. Maintain power levels delivered to the ESPs as needed to maximize collection efficiency.

TVA must complete and submit all PM emission control optimization studies according to the schedule dictated by Paragraph 99 the Consent Decree.

(e) No later than twelve (12) months after the date that EPA approves the plan for installation and correlation of the PM CEMS and the QA/QC protocol, as specified in the Consent Decree, the permittee shall install, correlate, maintain, and operate PM continuous emission monitoring systems (CEMS) as specified below. Each PM CEMS shall comprise a continuous particle mass monitor measuring PM concentration, directly or indirectly, on an hourly average basis and a diluent monitor used to convert the concentration to units of lb/MMBtu. The PM CEMS installed at each flue must be appropriate for the anticipated stack conditions. The permittee shall maintain, in an electronic database, the hourly average emission values produced by each PM CEMS in lb/MMBtu. Except for periods of monitor malfunction, maintenance, or repair, the permittee shall continuously operate the PM CEMS at all times when at least one Unit it serves is operating.

No later than ninety (90) days after the permittee begins operation of the PM CEMS, the permittee shall conduct tests of each PM CEMS to demonstrate compliance with the PM CEMS installation and correlation plan(s) and QA/QC protocol(s). Within forty-five (45) days of each such test, the permittee shall submit the results to EPA, the States, and the Citizen Plaintiffs pursuant to Section VIII (Notices) of the Consent Decree. Following the installation of each PM CEMS, the Permittee shall begin and continue to report the data recorded by the PM CEMS, expressed in lb/MMBtu on a 3-hour rolling average basis and a 24-hour rolling average basis in electronic format to EPA, the States, and the Citizen Plaintiffs, including identification of each 3-hour average and 24-hour average above the applicable PM Emission Rate for Kingston Units 1-9. Upon termination of the Consent Decree, or the applicable provisions therein, test results shall be submitted to the Technical Secretary; submittal to EPA and the Citizen Plaintiffs will no longer be required by this permit upon termination of the Consent Decree.

TAPCR 1200-03-06-.02(1), 1200-03-09-.02(11)(e)1.(iii), 40 CFR 64, Consent Decree

E3-15. Continuous Operation of NO_x and SO_2 Control Equipment

Beginning June 13, 2011 and continuing thereafter, the permittee shall continuously operate any pollution control technology or combustion control (including, but not limited to, SCR, FGD, PM Control Device, SNCR, Low NO_x Burner (LNB), Overfire Air (OFA) or Separated Overfire Air (SOFA)) at all times such Unit is in operation, except during a Malfunction that is determined to be a Force Majeure Event as defined by the Consent Decree. This continuous operation serves to minimize emissions to the greatest extent technically practicable consistent with the technological limitations, manufacturers' specifications, fire prevention codes, and good engineering and maintenance practices for such pollution control technology or combustion control and the Unit. This condition specifically applies to such equipment as the installed SCR and Wet FGD for NO_x and SO_2 emissions control.

TAPCR 1200-03-09-.03(8), Consent Decree

E3-16. Compliance with System-Wide Annual NO_x and SO_2 Tonnage Limits

During each calendar year all Units in the TVA System and any New CC/CT Units constructed pursuant to Paragraph 117 of the Consent Decree, collectively, shall not emit NO_x or SO_2 in excess of the System-Wide Annual Tonnage Limitations found in paragraphs 67-69 and 82-84 of the Consent Decree.

Compliance Method: In accordance with 40 CFR 75, TVA shall use CEMS to monitor emissions of NO_x and SO_2 to demonstrate compliance with the System-Wide Annual Tonnage Limitations.

TAPCR 1200-03-09-.03(8), Consent Decree