

PUBLIC NOTICE

Befesa Zinc US Inc. has applied to the Tennessee Department of Environment and Conservation, Division of Air Pollution Control for a significant modification to their existing major source (Title V) operating permit subject to the provisions of Tennessee Air Pollution Control Regulations 1200-03-09-.02(11) (Title V Regulations). A major source operating permit is required by both the Federal Clean Air Act and Tennessee's air pollution control regulations. However, it should be noted that this facility has a current major source operating permit.

The Title V operating permit subject to the modification is identified as follows: Division identification number 73-0107/562547. The specific permit conditions affected by this modification are identified as follows: B7, E1, E3-4, E3-10, E3-11, E3-12, E3-13, and E3-14. Only the portions of the Title V permit affected by this significant modification are open for comment during the notice period.

EPA has agreed to treat this draft significant modification to permit no. 562547 as a proposed Part 70 significant permit modification and to perform its 45-day review provided by the law concurrently with the public notice period. If any substantive comments are received, EPA's 45-day review period will cease to be performed concurrently with the public notice period. In this case, EPA's 45-day review period will start once the public notice period has been completed and EPA receives notification from the Tennessee Air Pollution Control Division that comments have been received and resolved. The status regarding EPA's 45-day review of these permits and the deadline for submitting a citizen's petition can be found at the following website address:

<https://www.epa.gov/caa-permitting/tennessee-proposed-title-v-permits>

Copies of the application materials and draft permits are available for public inspection during normal business hours at the following locations:

Division of Air Pollution Control
Knoxville Environmental Field Office
3711 Middlebrook Pike
Knoxville, TN 37921

and Tennessee Department of Environment and Conservation
Division of Air Pollution Control
Davy Crockett Tower
500 James Robertson Parkway, 7th Floor
Nashville, TN 37243

Electronic copies of the draft permit and application materials are available by accessing the TDEC internet site located at:

<https://www.tn.gov/environment/ppo-public-participation/ppo-public-participation/ppo-air.html>

Questions concerning the source(s) may be addressed to Chelsea Materi at (865) 594-0756 or by e-mail at chelsea.meadows@tn.gov.

Interested parties are invited to review these materials and comment. In addition, a public hearing may be requested at which written or oral presentations may be made. To be considered, written comments or requests for a public hearing must be received no later than 4:30 PM on **August 19, 2024**. To assure that written comments are received and addressed in a timely manner, written comments must be submitted using one of the following methods:

1. **Mail, private carrier, or hand delivery:** Address written comments to Ms. Michelle W. Owenby, Director, Division of Air Pollution Control, Davy Crockett Tower, 500 James Robertson Parkway 7th Floor, Nashville, Tennessee 37243.
2. **E-mail:** Submit electronic comments to air.pollution.control@tn.gov.

A final determination will be made after weighing all relevant comments.

Individuals with disabilities who wish to review information maintained at the above-mentioned depositories should contact the Tennessee Department of Environment and Conservation to discuss any auxiliary aids or services needed to facilitate such review. Such contact may be in person, by writing, telephone, or other means, and should be made no less than ten days prior to the end of the public comment period to allow time to provide such aid or services. Contact the Tennessee Department of Environment and Conservation ADA Coordinator, Davy Crockett Tower, 500 James Robertson Parkway 6th Floor, Nashville, TN 37243, 1-(866)-253-5827. Hearing impaired callers may use the Tennessee Relay Service, 1-(800)-848-0298.

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



SIGNIFICANT MODIFICATION #1

OPERATING PERMIT (TITLE V) Issued Pursuant to Tennessee Air Quality Act

This permit fulfills the requirements of Title V of the Federal Clean Air Act (42 U.S.C. 7661a-7661e) and the federal regulations promulgated thereunder at 40 CFR Part 70. (FR Vol. 57, No. 140, Tuesday, July 21, 1992 p.32295-32312). This permit is issued in accordance with the provisions of paragraph 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations. The permittee has been granted permission to operate an air contaminant source in accordance with emissions limitations and monitoring requirements set forth herein.

Date Issued: November 1, 2017

Permit Number: 562547

Date of Significant Modification #1: DRAFT

Date Expires: October 31, 2022

Issued To:

Befesa Zinc US Inc.

Installation Address:

199 Truck Route

Rockwood

Installation Description: Secondary Zinc Recycling

Source 100: Railcar Unloading

Source 200: Conditioning and Blending Building

Source 300: Outdoor Storage and handling

Source 400: Plant Conveyors

Source 500: IRM Material Crushing Building

Source 600: Pneumatic Railcar/truck Unloading and Feed Building

Source 700: Waelz Kiln #1

Source 800: Waelz Kiln #2

Source 900: Rail loading Operations

Emission Source Reference No.: 73-0107

Renewal Application Due Date:

Between February 3, 2022 and May 4, 2022

Primary SIC: 3341

Information Relied Upon:

Original application signed on December 22, 2008

Current application signed on March 21, 2012

Additional information dated May 3, 2013, December 23, 2013, January 17, 2014, February 21, 2014, May 27, 2014 and November 13, 2015

Name change letter dated May 1, 2017

Minor Modification request dated November 3, 2017

Minor Modification request dated January 31, 2017

Minor Modification request dated July 25, 2018

Minor Modification request dated December 20, 2018

Minor Modification request dated February 8, 2019

Minor Modification request dated April 3, 2019

Minor Modification request dated April 5, 2019

Minor Modification request dated November 11, 2019

Admin. Amendment request dated September 1, 2021

Significant Modification application dated September 2, 2022

(continued on the next page)

TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

POST AT INSTALLATION ADDRESS

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SECTION A

GENERAL PERMIT CONDITIONS

A permit issued under the provisions of paragraph 1200-03-09-.02(11) is a permit issued pursuant to the requirements of Title V of the Federal Act and its implementing Federal regulations promulgated at 40 CFR, Part 70.

- A1. Definitions.** Terms not otherwise defined in the permit shall have the meaning assigned to such terms in the referenced regulation.

TAPCR 1200-03

- A2. Compliance requirement.** All terms and conditions in a permit issued pursuant to paragraph 1200-03-09-.02(11) including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act.

The permittee shall comply with all conditions of its permit. Except for requirements specifically designated herein as not being federally enforceable (State Only), non-compliance with the permit requirements is a violation of the Federal Act and the Tennessee Air Quality Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Non-compliance with permit conditions specifically designated herein as not being federally enforceable (State Only) is a violation of the Tennessee Air Quality Act and may be grounds for these actions.

TAPCR 1200-03-09-.02(11)(e)2(i) and 1200-03-09-.02(11)(e)1(vi)(I)

- A3. Need to halt or reduce activity.** The need to halt or reduce activity is not a defense for noncompliance. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this item shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations.

TAPCR 1200-03-09-.02(11)(e)1(vi)(II)

- A4. The permit.** The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

TAPCR 1200-03-09-.02(11)(e)1(vi)(III)

- A5. Property rights.** The permit does not convey any property rights of any sort, or any exclusive privilege.

TAPCR 1200-03-09-.02(11)(e)1(vi)(IV)

- A6. Submittal of requested information.** The permittee shall furnish to the Technical Secretary, within a reasonable time, any information that the Technical Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or termination of the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Technical Secretary copies of records required to be kept by the permit. If the permittee claims that such information is confidential, the Technical Secretary may review that claim and hold the information in protected status until such time that the Board can hear any contested proceedings regarding confidentiality disputes. If the information is desired by EPA, the permittee may mail the information directly to EPA. Any claims of confidentiality for federal purposes will be determined by EPA.

TAPCR 1200-03-09-.02(11)(e)1(vi)(V)

- A7. Severability clause.** The requirements of this permit are severable. A dispute regarding one or more requirements of this permit does not invalidate or otherwise excuse the permittee from their duty to comply with the remaining portion of the permit.

TAPCR 1200-03-09-.02(11)(e)1(v)

A8. Fee payment.

(a) The permittee shall pay an annual Title V emission fee based upon the responsible official's choice of actual emissions, allowable emissions, or a combination of actual and allowable emissions; and on the responsible official's choice of annual accounting period. An emission cap of 4,000 tons per year per regulated pollutant per major source SIC Code shall apply to actual or allowable based emission fees. A Title V annual emission fee will not be charged for emissions in excess of the cap. Title V annual emission fees will not be charged for carbon monoxide or for greenhouse gas pollutants solely because they are greenhouse gases.

(b) Title V sources shall pay allowable based emission fees until the beginning of the next annual accounting period following receipt of their initial Title V operating permit. At that time, the permittee shall begin paying their Title V fee based upon their choice of actual or allowable based fees, or mixed actual and allowable based fees. Once permitted, the Responsible Official may revise their existing fee choice by submitting a written request to the Division no later than December 31 of the annual accounting period for which the fee is due.

(c) When paying annual Title V emission fees, the permittee shall comply with all provisions of 1200-03-26-.02 and 1200-03-09-.02(11) applicable to such fees.

(d) Where more than one (1) allowable emission limit is applicable to a regulated pollutant, the allowable emissions for the regulated pollutants shall not be double counted. Major sources subject to the provisions of paragraph 1200-03-26-.02(9) shall apportion their emissions as follows to ensure that their fees are not double counted.

1. Sources that are subject to federally promulgated hazardous air pollutant under 40 CFR 60, 61, or 63 will place such regulated emissions in the regulated hazardous air pollutant (HAP) category.

2. A category of miscellaneous HAPs shall be used for hazardous air pollutants listed at part 1200-03-26-.02(2)(i)12 that are not subject to federally promulgated hazardous air pollutant standards under 40 CFR 60, 61, or 63.

3. HAPs that are also in the family of volatile organic compounds, particulate matter, or PM₁₀ shall not be placed in either the regulated HAP category or miscellaneous HAP category.

4. Sources that are subject to a provision of chapter 1200-03-16 New Source Performance Standards (NSPS) or chapter 0400-30-39 Standards of Performance for New Stationary Sources for pollutants that are neither particulate matter, PM₁₀, sulfur dioxide (SO₂), volatile organic compounds (VOC), nitrogen oxides (NO_x), or hazardous air pollutants (HAPs) will place such regulated emissions in an NSPS pollutant category.

5. The regulated HAP category, the miscellaneous HAP category, and the NSPS pollutant category are each subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

6. Major sources that wish to pay annual emission fees for PM₁₀ on an allowable emission basis may do so if they have a specific PM₁₀ allowable emission standard. If a major source has a total particulate emission standard, but wishes to pay annual emission fees on an actual PM₁₀ emission basis, it may do so if the PM₁₀ actual emission levels are proven to the satisfaction of the Technical Secretary. The method to demonstrate the actual PM₁₀ emission levels must be made as part of the source's major source operating permit in advance in order to exercise this option. The PM₁₀ emissions reported under these options shall not be subject to fees under the family of particulate emissions. The 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) shall also apply to PM₁₀ emissions.

TAPCR 1200-03-26-.02 and 1200-03-09-.02(11)(e)1(vii)

A9. Permit revision not required. A permit revision will not be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or process for changes that are provided for in the permit.

TAPCR 1200-03-09-.02(11)(e)1(viii)

A10. Inspection and entry. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Technical Secretary or his authorized representative to perform the following for the purposes of determining compliance with the permit applicable requirements:

(a) Enter upon, at reasonable times, the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

(d) As authorized by the Clean Air Act and Chapter 1200-03-10 of TAPCR, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(e) "Reasonable times" shall be considered to be customary business hours unless reasonable cause exists to suspect noncompliance with the Act, Division 1200-03 or any permit issued pursuant thereto and the Technical Secretary specifically authorizes an inspector to inspect a facility at any other time.

TAPCR 1200-03-09-.02(11)(e)3.(ii)

A11. Permit shield.

(a) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date of permit issuance, provided that:

1. Such applicable requirements are included and are specifically identified in the permit; or
2. The Technical Secretary, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.

(b) Nothing in this permit shall alter or affect the following:

1. The provisions of section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section. Similarly, the provisions of T.C.A. §68-201-109 (emergency orders) including the authority of the Governor under the section;
2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Federal Act; or
4. The ability of EPA to obtain information from a source pursuant to section 114 of the Federal Act.

(c) Permit shield is granted to the permittee.

TAPCR 1200-03-09-.02(11)(e)6.

A12. Permit renewal and expiration.

(a) An application for permit renewal must be submitted at least 180 days, but no more than 270 days prior to the expiration of this permit. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted.

(b) Provided that the permittee submits a timely and complete application for permit renewal the source will not be considered in violation of paragraph 1200-03-09-.02(11) until the Technical Secretary takes final action on the permit application, except as otherwise noted in paragraph 1200-03-9-.02(11).

(c) This permit, its shield provided in Condition A11, and its conditions will be extended and effective after its expiration date provided that the source has submitted a timely, complete renewal application to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)3 and 2, 1200-03-09-.02(11)(d)1(i)(III), and 1200-03-09-.02(11)(a)2

A13. Reopening for cause.

(a) A permit shall be reopened and revised prior to the expiration of the permit under any of the circumstances listed below:

1. Additional applicable requirements under the Federal Act become applicable to the sources contained in this permit provided the permit has a remaining term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the permit expiration date of this permit, unless the original has been extended pursuant to 1200-03-09-.02(11)(a)2.
2. Additional requirements become applicable to an affected source under the acid rain program.
3. The Technical Secretary or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
4. The Technical Secretary or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(b) Proceedings to reopen and issue a permit shall follow the same proceedings as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists, and not the entire permit. Such reopening shall be made as expeditiously as practicable.

(c) Reopenings for cause shall not be initiated before a notice of such intent is provided to the permittee by the Technical Secretary at least 30 days in advance of the date that the permit is to be reopened except that the Technical Secretary may provide a shorter time period in the case of an emergency. An emergency shall be established by the criteria of T.C.A. 68-201-109 or other compelling reasons that public welfare is being adversely affected by the operation of a source that is in compliance with its permit requirements.

(d) If the Administrator finds that cause exists to terminate, modify, or revoke and reissue a permit as identified in A13, he is required under federal rules to notify the Technical Secretary and the permittee of such findings in writing. Upon receipt of such notification, the Technical Secretary shall investigate the matter in order to determine if he agrees or disagrees with the Administrator's findings. If he agrees with the Administrator's findings, the Technical Secretary shall conduct the reopening in the following manner:

1. The Technical Secretary shall, within 90 days after receipt of such notification, forward to EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate. If the Administrator grants additional time to secure permit applications or additional information from the permittee, the Technical Secretary shall have the additional time period added to the standard 90 day time period.
2. EPA will evaluate the Technical Secretary's proposed revisions and respond as to their evaluation.
3. If EPA agrees with the proposed revisions, the Technical Secretary shall proceed with the reopening in the same manner prescribed under Condition A13 (b) and Condition A13 (c).
4. If the Technical Secretary disagrees with either the findings or the Administrator that a permit should be reopened or an objection of the Administrator to a proposed revision to a permit submitted pursuant to Condition A13(d), he shall bring the matter to the Board at its next regularly scheduled meeting for instructions as to how he should proceed. The permittee shall be required to file a written brief expressing their position relative to the Administrator's objection and have a responsible official present at the meeting to answer questions for the Board. If the Board agrees that EPA is wrong in their demand for a permit revision, they shall instruct the Technical Secretary to conform to EPA's demand, but to issue the permit under protest preserving all rights available for litigation against EPA.

TAPCR 1200-03-09-.02(11)(f)6 and 7.

A14. Permit transference. An administrative permit amendment allows for a change of ownership or operational control of a source where the Technical Secretary determines that no other change in the permit is necessary, provided that the following requirements are met:

- (a) Transfer of ownership permit application is filed consistent with the provisions of 1200-03-09-.03(6), and
- (b) Written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)4(i)(IV) and 1200-03-09-.03(6)

A15. Air pollution alert. When the Technical Secretary has declared that an air pollution alert, an air pollution warning, or an air pollution emergency exists, the permittee must follow the requirements for that episode level as outlined in TAPCR 1200-03-09-.03(1) and TAPCR 1200-03-15-.03.

A16. Construction permit required. Except as exempted in TAPCR 1200-03-09-.04, or excluded in subparagraph TAPCR 1200-03-02-.01(1)(aa) or subparagraph TAPCR 1200-03-02-.01(1)(cc), this facility shall not begin the construction of a new air contaminant source or the modification of an air contaminant source which may result in the discharge of air contaminants without first having applied for and received from the Technical Secretary a construction permit for the construction or modification of such air contaminant source.

TAPCR 1200-03-09-.01(1)(a)

A17. Notification of changes. The permittee shall notify the Technical Secretary 30 days prior to commencement of any of the following changes to an air contaminant source which would not be a modification requiring a construction permit.

- (a) change in air pollution control equipment
- (b) change in stack height or diameter
- (c) change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

TAPCR 1200-03-09-.02(7)

- A18. Schedule of compliance.** The permittee will comply with any applicable requirement that becomes effective during the permit term on a timely basis. If the permittee is not in compliance, the permittee must submit a schedule for coming into compliance, which must include a schedule of remedial measure(s), including an enforceable set of deadlines for specific actions.

TAPCR 1200-03-09-.02(11)(d)3 and 40 CFR Part 70.5(c)

A19. Title VI.

(a) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:

1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to Section 82.156.
2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to Section 82.158.
3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to Section 82.161.

(b) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

(c) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR, Part 82, Subpart G, Significant New Alternatives Policy Program.

- A20. 112 (r).** The permittee shall comply with the requirement to submit to the Administrator or designated State Agency a risk management plan, including a registration that reflects all covered processes, by June 21, 1999, if the permittee's facility is required pursuant to 40 CFR 68 to submit such a plan.

TAPCR 1200-03-32-.03(3)

SECTION B

**GENERAL CONDITIONS for MONITORING,
REPORTING, and ENFORCEMENT**

B1. Recordkeeping. Monitoring and related record keeping shall be performed in accordance with the requirements specified in the permit conditions for each individual permit unit. In no case shall reports of any required monitoring and record keeping be submitted less frequently than every six months.

- (a) Where applicable, records of required monitoring information include the following:
1. The date, place as defined in the permit, and time of sampling or measurements;
 2. The date(s) analyses were performed;
 3. The company or entity that performed the analysis;
 4. The analytical techniques or methods used;
 5. The results of such analyses; and
 6. The operating conditions as existing at the time of sampling or measurement.

(b) Digital data accumulation which utilizes valid data compression techniques shall be acceptable for compliance determination as long as such compression does not violate an applicable requirement and its use has been approved in advance by the Technical Secretary.

TAPCR 1200-03-09-.02(11)(e)1(iii)

B2. Retention of monitoring data. The permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

TAPCR 1200-03-09-.02(11)(e)1(iii)(II)II

B3. Reporting. Reports of any required monitoring and record keeping shall be submitted to the Technical Secretary in accordance with the frequencies specified in the permit conditions for each individual permit unit. Reporting periods will be dated from the end of the first complete calendar quarter following issuance of this permit unless otherwise noted. Reports shall be submitted within 60 days of the close of the reporting period unless otherwise noted. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. Reports required under "State only requirements" are not required to be certified by a responsible official.

TAPCR 1200-03-09-.02(11)(e)1(iii)

B4. Certification. Except for reports required under "State Only" requirements, any application form, report or compliance certification submitted pursuant to the requirements of this permit shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

TAPCR 1200-03-09-.02(11)(d)4

B5. Annual compliance certification. The permittee shall submit annually compliance certifications with terms and conditions contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

- (a) The identification of each term or condition of the permit that is the basis of the certification;
- (b) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;

(c) The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in B5(b) above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an *excursion or **exceedance as defined below occurred; and

(d) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

* "Excursion" shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

** "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol.79, No. 144, July 28, 2014, pages 43661 through 43667

B6. Submission of compliance certification. The compliance certification shall be submitted to:

The Tennessee Department of Environment
and Conservation Environmental Field Office
specified in Section E of this permit

and Air Enforcement and Toxics Branch
US EPA Region IV
61 Forsyth Street, SW
Atlanta, Georgia 30303

TAPCR 1200-03-09-.02(11)(e)3(v)(IV)

B7. Reserved

B8. Excess emissions reporting.

(a) The permittee shall promptly notify the Technical Secretary when any emission source, air pollution control equipment, or related facility breaks down in such a manner to cause the emission of air contaminants in excess of the applicable emission standards contained in Division 1200-03 or any permit issued thereto, or of sufficient duration to cause damage to property or public health. The permittee must provide the Technical Secretary with a statement giving all pertinent facts, including the estimated duration of the breakdown. Violations of the visible emission standard which occur for less than 20 minutes in one day (midnight to midnight) need not be reported. Prompt notification will be within 24 hours of the malfunction and shall be provided by telephone to the Division's Nashville office. The Technical Secretary shall be notified when the condition causing the failure or breakdown has been corrected. In attainment and unclassified areas if emissions other than from sources designated as significantly impacting on a nonattainment area in excess of the standards will not and do not occur over more than a 24-hour period (or will not recur over more than a 24-hour period) and no damage to property and or public health is anticipated, notification is not required.

(b) Any malfunction that creates an imminent hazard to health must be reported by telephone immediately to the Division's Nashville office and to the State Civil Defense.

(c) A log of all malfunctions, startups, and shutdowns resulting in emissions in excess of the standards in Division 1200-03 or any permit issued thereto must be kept at the plant. All information shall be entered in the log no later than twenty-four (24) hours after the startup or shutdown is complete, or the malfunction has ceased or has been corrected. Any later discovered corrections can be added in the log as footnotes with the reason given for the change. This log must record at least the following:

1. Stack or emission point involved
2. Time malfunction, startup, or shutdown began and/or when first noticed
3. Type of malfunction and/or reason for shutdown
4. Time startup or shutdown was complete or time the air contaminant source returned to normal operation
5. The company employee making entry on the log must sign, date, and indicate the time of each log entry. The information under items 1. and 2. must be entered into the log by the end of the shift during which the malfunction or startup began. For any source utilizing continuous emission(s) monitoring, continuous emission(s) monitoring collection satisfies the above log keeping requirement.

TAPCR 1200-03-20-.03 and .04

B9. Malfunctions, startups and shutdowns - reasonable measures required. The permittee must take all reasonable measures to keep emissions to a minimum during startups, shutdowns, and malfunctions. These measures may include installation and use of alternate control systems, changes in operating methods or procedures, cessation of operation until the process equipment and/or air pollution control equipment is repaired, maintaining sufficient spare parts, use of overtime labor, use of outside consultants and contractors, and other appropriate means. Failures that are caused by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions. This provision does not apply to standards found in 40 CFR, Parts 60 (Standards of performance for new stationary sources), 61 (National emission standards for hazardous air pollutants) and 63 (National emission standards for hazardous air pollutants for source categories).

TAPCR 1200-03-20-.02

B10. Reserved.

B11. Report required upon the issuance of a notice of violation for excess emissions. The permittee must submit within twenty (20) days after receipt of the notice of violation, the data shown below to assist the Technical Secretary in deciding whether to excuse or validate the violation. If this data has previously been available to the Technical Secretary prior to the issuance of the notice of violation no further action is required of the violating source. However, if the source desires to submit additional information, then this must be submitted within the same twenty (20) day time period. The minimum data requirements are:

- (a) The identity of the stack and/or other emission point where the excess emission(s) occurred;
- (b) The magnitude of the excess emissions expressed in pounds per hour and the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;
- (c) The time and duration of the emissions;
- (d) The nature and cause of such emissions;
- (e) For malfunctions, the steps taken to correct the situation and the action taken or planned to prevent the recurrence of such malfunctions;
- (f) The steps taken to limit the excess emissions during the occurrence reported, and
- (g) If applicable, documentation that the air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good operating practices for minimizing emissions.

Failure to submit the required report within the twenty (20) day period specified shall preclude the admissibility of the data for consideration of excusal for malfunctions.

TAPCR 1200-03-20-.06(2), (3) and (4)

SECTION C

PERMIT CHANGES

C1. Operational flexibility changes. The source may make operational flexibility changes that are not addressed or prohibited by the permit without a permit revision subject to the following requirements:

- (a) The change cannot be subject to a requirement of Title IV of the Federal Act or Chapter 1200-03-30.
- (b) The change cannot be a modification under any provision of Title I of the federal Act or Division 1200-03.
- (c) Each change shall meet all applicable requirements and shall not violate any existing permit term or condition.
- (d) The source must provide contemporaneous written notice to the Technical Secretary and EPA of each such change, except for changes that are below the threshold of levels that are specified in Rule 1200-03-09-.04.
- (e) Each change shall be described in the notice including the date, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change.
- (f) The change shall not qualify for a permit shield under the provisions of part 1200-03-09-.02(11)(e)6.
- (g) The permittee shall keep a record describing the changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. The records shall be retained until the changes are incorporated into subsequently issued permits.

TAPCR 1200-03-09-.02(11)(a)4 (ii)

C2. Section 502(b)(10) changes.

(a) The permittee can make certain changes without requiring a permit revision, if the changes are not modifications under Title I of the Federal Act or Division 1200-03 and the changes do not exceed the emissions allowable under the permit. The permittee must, however, provide the Administrator and Technical Secretary with written notification within a minimum of 7 days in advance of the proposed changes. The Technical Secretary may waive the 7 day advance notice in instances where the source demonstrates in writing that an emergency necessitates the change. Emergency shall be demonstrated by the criteria of TAPCR 1200-03-09-.02(11)(e)7 and in no way shall it include changes solely to take advantages of an unforeseen business opportunity. The Technical Secretary and EPA shall attach each such notice to their copy of the relevant permit.

(b) The written notification must be signed by the facility Title V Responsible Official and include the following:

1. a brief description of the change within the permitted facility;
2. specifies the date on which the change will occur;
3. declares and quantifies where possible any change in emissions;
4. declares any permit term or condition that is no longer applicable as a result of the change; and
5. declares the requested change is not a Title I modification and will not exceed allowable emissions under the permit.

(c) The permit shield provisions of TAPCR 1200-03-09-.02(11)(e)6 shall not apply to Section 502(b)(10) changes.

TAPCR 1200-03-09-.02(11)(a)4 (i)

C3. Administrative amendment.

(a) Administrative permit amendments to this permit shall be in accordance with 1200-03-09-.02(11)(f)4. The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.

(b) The permit shield shall be extended as part of an administrative permit amendment revision consistent with the provisions of TAPCR 1200-03-9-.02(11)(e)6 for such revisions made pursuant to item (c) of this condition which meet the relevant requirements of TAPCR 1200-03-09-.02(11)(e), TAPCR 1200-03-09-.02(11)(f) and TAPCR 1200-03-09-.02(11)(g) for significant permit modifications.

(c) Proceedings to review and grant administrative permit amendments shall be limited to only those parts of the permit for which cause to amend exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)4

C4. Minor permit modifications.

(a) The permittee may submit an application for a minor permit modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(ii).

(b) The permittee may make the change proposed in its minor permit modification immediately after an application is filed with the Technical Secretary.

(c) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.

(d) Minor permit modifications do not qualify for a permit shield.

TAPCR 1200-03-09-.02(11)(f)5(ii)

C5. Significant permit modifications.

(a) The permittee may submit an application for a significant modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(iv).

(b) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)5(iv)

C6. New construction or modifications.

Future construction at this source that is subject to the provisions of TAPCR 1200-03-09-.01 shall be governed by the following:

(a) The permittee shall designate in their construction permit application the route that they desire to follow for the purposes of incorporating the newly constructed or modified sources into their existing operating permit. The Technical Secretary shall use that information to prepare the operating permit application submittal deadlines in their construction permit.

(b) Sources desiring the permit shield shall choose the administrative amendment route of TAPCR 1200-03-09-.02(11)(f)4 or the significant modification route of TAPCR 1200-03-09-.02(11)(f)5(iv).

(c) Sources desiring expediency instead of the permit shield shall choose the minor permit modification procedure route of TAPCR 1200-03-09-.02(11)(f)5(ii) or group processing of minor modifications under the provisions of TAPCR 1200-03-09-.02(11)(f)5(iii) as applicable to the magnitude of their construction.

TAPCR 1200-03-09-.02(11)(d) 1(i)(V)

SECTION D

GENERAL APPLICABLE REQUIREMENTS

D1. Visible emissions. With the exception of air emission sources exempt from the requirements of TAPCR Chapter 1200-03-05 and air emission sources for which a different opacity standard is specifically provided elsewhere in this permit, the permittee shall not cause, suffer, allow or permit discharge of a visible emission from any air contaminant source with an opacity in excess of twenty (20) percent for an aggregate of more than five (5) minutes in any one (1) hour or more than twenty (20) minutes in any twenty-four (24) hour period; provided, however, that for fuel burning installations with fuel burning equipment of input capacity greater than 600 million btu per hour, the permittee shall not cause, suffer, allow, or permit discharge of a visible emission from any fuel burning installation with an opacity in excess of twenty (20) percent (6-minute average) except for one six minute period per one (1) hour of not more than forty (40) percent opacity. Sources constructed or modified after July 7, 1992 shall utilize 6-minute averaging.

Consistent with the requirements of TAPCR Chapter 1200-03-20, due allowance may be made for visible emissions in excess of that permitted under TAPCR 1200-03-05 which are necessary or unavoidable due to routine startup and shutdown conditions. The facility shall maintain a continuous, current log of all excess visible emissions showing the time at which such conditions began and ended and that such record shall be available to the Technical Secretary or his representative upon his request.

TAPCR 1200-03-05-.01(1), TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.02(1)

D2. General provisions and applicability for non-process gaseous emissions. Any person constructing or otherwise establishing a non-portable air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize the best equipment and technology currently available for controlling such gaseous emissions.

TAPCR 1200-03-06-.03(2)

D3. Non-process emission standards. The permittee shall not cause, suffer, allow, or permit particulate emissions from non-process sources in excess of the standards in TAPCR 1200-03-06.

D4. General provisions and applicability for process gaseous emissions. Any person constructing or otherwise establishing an air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize equipment and technology which is deemed reasonable and proper by the Technical Secretary.

TAPCR 1200-03-07-.07(2)

D5. Particulate emissions from process emission sources. The permittee shall not cause, suffer, allow, or permit particulate emissions from process sources in excess of the standards in TAPCR 1200-03-07.

D6. Sulfur dioxide emission standards. The permittee shall not cause, suffer, allow, or permit Sulfur dioxide emissions from process and non-process sources in excess of the standards in TAPCR 1200-03-14. Regardless of the specific emission standard, new process sources shall utilize the best available control technology as deemed appropriate by the Technical Secretary of the Tennessee Air Pollution Control Board.

D7. Fugitive Dust.

(a) The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions shall include, but not be limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
2. Application of asphalt, oil, water, or suitable chemicals on dirt roads, material stock piles, and other surfaces which can create airborne dusts;
3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

(b) The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five (5) minutes per hour or twenty (20) minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in Chapter 1200-03-20.

TAPCR 1200-03-08

D8. Open burning. The permittee shall comply with the TAPCR 1200-03-04-.04 for all open burning activities at the facility.

TAPCR 1200-03-04

D9. Asbestos. Where applicable, the permittee shall comply with the requirements of 1200-03-11-.02(2)(d) when conducting any renovation or demolition activities at the facility.

TAPCR 1200-03-11-.02(2)(d) and 40 CFR, Part 61

D10. Annual certification of compliance. The generally applicable requirements set forth in Section D of this permit are intended to apply to activities and sources that are not subject to source-specific applicable requirements contained in State of Tennessee and U.S. EPA regulations. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related record keeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)1 and compliance requirements of TAPCR 1200-03-09-.02(11)(e)3.(i). The permittee shall submit compliance certification for these conditions annually

D11(MM7). Gasoline Dispensing Facilities. For each gasoline dispensing facility at the facility, including gasoline dispensing facilities deemed insignificant activities and insignificant emission units, the permittee shall comply with all provisions of the following that are applicable to the gasoline dispensing facility:

(a) TAPCR 1200-03-18-.24, incorporating by reference the federal National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facility (40 CFR 63 Subpart CCCCCC)

TAPCR 1200-03-18-.24

D12(MM7). Internal Combustion Engines. For each stationary internal combustion engine at the facility, including engines deemed insignificant activities and insignificant emission units, the permittee shall comply with all provisions that are applicable to the engine:

- (a) TAPCR 0400-30-38-.01(2), incorporating by reference the federal National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63 Subpart ZZZZ).
- (b) TAPCR 0400-30-39-.01(2) incorporating by reference the federal Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (40 CFR Part 60 Subpart IIII).
- (c) TAPCR 0400-30-39-.02(2) incorporating by reference the federal Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (40 CFR 60 Subpart JJJJ).

TAPCR 0400-30-38-.01(1), 0400-30-39-.01(2), and 0400-30-39-.02(2)

SECTION E

SOURCE SPECIFIC EMISSION STANDARDS, OPERATING LIMITATIONS, and MONITORING, RECORDKEEPING and REPORTING REQUIREMENTS

73-0107 **Facility Description:** Recovery of Zinc Oxide from Electric Furnace Dust

Conditions E1 through E3-16 apply to all sources in the facility unless otherwise noted.

E1(SM1). Fee payment:

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 73-0107

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	192.45	AEAR	Fee emissions include PM HAPs
PM ₁₀	N/A	N/A	
SO ₂	74.81	AEAR	Includes all fee emissions
VOC	163.03	AEAR	Includes all fee emissions
NO _x	172.79	AEAR	Includes all fee emissions
CATEGORY OF MISCELLANEOUS HAZARDOUS AIR POLLUTANTS (HAP WITHOUT A STANDARD)*			
VOC FAMILY GROUP	N/A	N/A	
NON-VOC GASEOUS GROUP	N/A	N/A	
PM FAMILY GROUP (Lead, Chromium, Cadmium)	2.41, 0.29, 0.27	AEAR	Fees included in PM.
CATEGORY OF SPECIFIC HAZARDOUS AIR POLLUTANTS (HAP WITH A STANDARD)**			
VOC FAMILY GROUP	N/A	N/A	
NON-VOC GASEOUS GROUP	N/A	N/A	
PM FAMILY GROUP	N/A	N/A	
CATEGORY OF NSPS POLLUTANTS NOT LISTED ABOVE***			
EACH NSPS POLLUTANT NOT LISTED ABOVE	N/A	N/A	

NOTES

AAP The **Annual Accounting Period (AAP)** is a twelve (12) consecutive month period that **either (a) begins each July 1st and ends June 30th of the following year if fees are paid on a fiscal year basis, or (b) begins January 1st and ends December 31st of the same year if paying on a calendar year basis.** The **Annual Accounting Period** at the time of significant modification #1 issuance **began July 1, 2024, and ends June 30, 2025.** The next Annual Accounting Period begins **July 1, 2025,** and ends **June 30, 2026,** unless a request to change the annual accounting period is submitted by the responsible official as required by subparagraph 1200-03-26-.02(9)(b) and approved by the Technical Secretary. If the permittee wishes to revise their annual accounting period or their annual emission fee basis as allowed by subparagraph 1200-03-26-.02(9)(b), the responsible official must submit the request the Division in writing on or before December 31 of the annual accounting period for which the fee is due. If a change in fee basis from allowable emissions to actual emissions for any pollutant is requested, the request from the responsible official must include the methods that will be used to determine actual emissions.

N/A N/A indicates that no emissions are specified for fee computation.

AEAR If the permittee is paying annual emission fees on an actual emissions basis, **AEAR** indicates that an **Actual Emissions Analysis** is **Required** to determine the actual emissions of:

- (1) **each regulated pollutant** (Particulate matter, SO₂, VOC, NO_x and so forth. See TAPCR 1200-03-26-.02(2)(i) for the definition of a regulated pollutant.),
- (2) **each pollutant group** (VOC Family, Non-VOC Gaseous, and Particulate Family), and
- (3) the **Miscellaneous HAP Category**,
- (4) the **Specific HAP Category**, and
- (5) the **NSPS Category**

under consideration during the **Annual Accounting Period**.

* **Category Of Miscellaneous HAP (HAP Without A Standard):** This category is made-up of hazardous air pollutants that do not have a federal or state standard. Each HAP is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation**, the **Miscellaneous HAP Category** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

** **Category Of Specific HAP (HAP With A Standard):** This category is made-up of hazardous air pollutants (HAP) that are subject to Federally promulgated Hazardous Air Pollutant Standards that can be imposed under Chapter 1200-03-11 or Chapter 1200-03-31. Each individual hazardous air pollutant is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation**, each individual hazardous air pollutant of the **Specific HAP Category** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

*** **Category Of NSPS Pollutants Not Listed Above:** This category is made-up of each New Source Performance Standard (NSPS) pollutant whose emissions are not included in the **PM, SO₂, VOC** or **NO_x** emissions from each source in this permit. **For fee computation**, each **NSPS pollutant not listed above** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

END NOTES

The permittee shall:

- (1) Pay **Title V annual allowable based emission fees** for the **present Annual Accounting Period (AAP) of July 1, 2024 through June 30, 2025**, subject to the revision of the annual accounting period or the annual emission fee basis by submitting a request to the Division in writing on or before December 31, 2021, as provided in condition A8(b) and Note AAP in this Condition E1.
- (2) For subsequent annual accounting periods, pay **Title V annual emission fees**, on the emissions and year bases requested by the responsible official and approved by the Technical Secretary, for each annual accounting period (AAP) by the payment deadline(s) established in TAPCR 1200-03-26-.02(9)(g). Fees may be paid on an **actual, allowable, or mixed** emissions basis; and on either a **state fiscal year** or a **calendar year**, provided the requirements of 1200-03-26-.02(9)(b) are met. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within fifteen (15) days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8).
- (3) Sources paying annual emissions fees on an allowable emissions basis: pay annual allowable based emission fees for each annual accounting period pursuant to TAPCR 1200-03-26-.02(9)(d).
- (4) Sources paying annual emissions fees on an actual emissions basis: prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
 - (a) the completed **Fee Emissions Summary Table**,
 - (b) each **actual emissions analysis** required, and
 - (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for

fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. These calculations must be based on the annual fee basis approved by the Technical Secretary (a state fiscal year [July 1 through June 30] or a calendar year [January 1 through December 31]). These records shall be used to complete the **actual emissions analyses** required by the above **Fee Emissions Summary Table**.

- (5) Sources paying annual emissions fees on a mixed emissions basis: for all pollutants and all sources for which the permittee has chosen an actual emissions basis, prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
- (a) the completed **Fee Emissions Summary Table**,
 - (b) each **actual emissions analysis** required, and
 - (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. These calculations must be based on the fee bases approved by the Technical Secretary (payment on an actual or mixed emissions basis) and payment on a state fiscal year (July 1 through June 30) or a calendar year (January 1 through December 31). These records shall be used to complete the **actual emissions analysis**.
- For all pollutants and all sources for which the permittee has chosen an allowable emissions basis, pay allowable based emission fees pursuant to TAPCR 1200-03-26-.02(9)(d).
- (6) When paying on an actual or mixed emissions basis, submit the **actual emissions analyses** at the time the fees are paid in full.

The annual emission fee due dates are specified in TAPCR 1200-03-26-.02(g). With the exception of the fee due for the initial annual accounting period, due dates are dependent on the Responsible Official's choice of fee bases as described above for AAPs following the AAP in which the permit is issued. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within fifteen (15) days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8). Emissions for regulated pollutants shall not be double counted as specified in Condition A8(d) of this permit.

Payment of the fee due and the actual emissions analysis (if required) shall be submitted to The Technical Secretary at the following address:

Payment of Fee to:
 The Tennessee Department of Environment and Conservation
 Division of Fiscal Services
 Consolidated Fee Section – APC
 Davy Crockett Tower, 6th Floor
 500 James Robertson Parkway
 Nashville, Tennessee 37243

Actual Emissions Analyses to:
 The Tennessee Department of Environment and Conservation
 Division of Air Pollution Control
 Davy Crockett Tower, 7th Floor
 500 James Robertson Parkway
 Nashville, Tennessee 37243

or
 An electronic copy (PDF) of actual emissions analysis can also be submitted to: apc.inventory@tn.gov

TAPCR 1200-03-26-.02 (3) and (9), and 1200-03-09-.02(11)(e)1 (iii) and (vii)

E2(MM5). Reporting requirements

(a) **Semiannual reports.** Reports shall cover the 6-month period from January 1 through June 30, and July 1 through December 31. Reports shall be submitted within 60 days after the end of each 6-month period.

These semiannual reports shall include:

- (1) Reports of any monitoring, recordkeeping and calculated emission rates required by conditions E4-1, E5-2, E7-1, E8-1, E9-1, E10-1, E10-6, E10-7, E11-1, E11-3, E11-5, and E12-1, of this permit. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (2) The visible emission evaluation readings from condition E3-1 and E3-2 for all regulated stack emission of this permit if required. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (3) Identification of all instances of deviations from **ALL PERMIT REQUIREMENTS.**

These reports must be certified by a responsible official consistent with condition B4 of this permit and shall be submitted to The Technical Secretary at the address in Condition E2(b) of this permit.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

(b) **Annual compliance certification:** The permittee shall submit annually compliance certifications with the terms and conditions contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

- (1) The identification of each term or condition of the permit that is the basis of the certification;
- (2) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; Such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;
- (3) The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in E2(b)2 above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an *excursion or **exceedance as defined below occurred; and
- (4) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

* “Excursion” shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

** “Exceedance” shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

Annual certifications shall cover the 12-month period from January 1 through December 31 and shall be submitted within 60 days after the end of each 12-month period ending December 31.

These certifications shall be submitted to: **TN APCD and EPA**

Technical Secretary
Division of Air Pollution Control
Knoxville Environmental Field Office
3711 Middlebrook Pike
Knoxville, TN 37921

and Air Enforcement and Toxics Branch
US EPA Region IV
61 Forsyth Street, SW
Atlanta, Georgia 30303

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol.79, No. 144, July 28, 2014, pages 43661 through 43667

In lieu of submitting a paper copy to the above address for the Knoxville Field Office, an electronic copy (PDF) can also be submitted to the following email address:

APC.KnoxEFO@tn.gov

(c) **Retention of Records** All records required by any condition in Section E of this permit must be retained for a period of not less than five years. Additionally, these records shall be kept available for inspection by the Technical Secretary or representative.

TAPCR 1200-03-09-.02(11)(e)1.(iii)(II)II

E3. General requirements applicable to permitted facility.

E3-1. Visible emissions from openings (windows, doors, seals, ducts) on each of the following buildings (the “process buildings”) shall not exceed 20% opacity except for one six minute period per one (1) hour or more than twenty-four (24) minutes in any twenty-four (24) hour period: the rail unloading building, the conditioning and blending (C&B) building, the PD feed tower and the feed building.

TAPCR 1200-03-05-.01(1) and 1200-.03-05-.03(6)

Compliance Method: Compliance with the particulate matter emission limit shall be assured by performing once daily observations of the process buildings for at least 5 minutes for the presence of visible emissions when the sources within these buildings are operating according to a U.S. EPA modified Method 22 like procedure. If, during the observation, visible emissions are observed, a certified observer will conduct, as appropriate, a 40 CFR 60, Appendix A, Method 9 visual emission observation. If the 40 CFR 60, Appendix A, Method 9 reading results in opacity greater than 20% the appropriate maintenance action will be implemented as provided in the fugitive emissions maintenance plan required under **Condition E3-15**.

A written log of the daily visible emission observations and any 40 CFR 60, Appendix A, Method 9 observations shall be maintained at the facility and kept available for inspection by the Tennessee Division of Air Pollution Control. This log shall be used to assure compliance with this Condition E3-1 and to provide information for the reporting requirements of Condition E2(a) of this permit. The log shall be retained for a period of not less than five years.

E3-2. Except as provided in condition E11-14, visible emissions from each of the stacks at this facility shall not exhibit greater than 20% opacity, except for one (1) six –minute period in any one (1) hour period and for no more than four (4) six-minute periods in any twenty four (24) hour period. Visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six minute average)

This limitation has been established pursuant to TAPCR 1200-03-05-.01(1), 1200-.03-05-.03(6) and construction permit application dated May 27, 2014.

Compliance Method: Compliance with this opacity limitation shall be certified through utilization of the Division’s Opacity Matrix dated June 18, 1996, amended September 11, 2013, using EPA Method 9 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened pursuant to Condition A13 to impose additional opacity monitoring.

- E3-3.** Visible emissions from roads and parking lots shall not exceed 10% opacity utilizing Tennessee Visible Emissions Evaluation Method 1, as adopted by the Tennessee Air Pollution Control Board on April 29, 1982, as amended on September 15, 1982 and as amended on August 24, 1984.

TAPCR 1200-03-05

Compliance Method: As and when required by the Technical Secretary.

- E3-4(SM1).** Identification of Responsible Official, Technical Contact, and Billing Contact:

(a) The application that was utilized in the preparation of this permit is dated December 22, 2008, which was signed by then Responsible Official Thomas E. Janeck, Vice President, Environmental Affairs of the permitted facility and the revised application dated March 22, 2012, signed by then Responsible Official Timothy R. Basilone, Vice President, Environmental Affairs. The application utilized in the preparation of Significant Modification #1 is dated September 2, 2022, and signed by current Responsible Official Don Norton, Director of Operations for the permitted facility. If this person terminates their employment or is assigned different duties such that he is no longer a Responsible Official for this facility as defined in part 1200-03-09-.02(11)(b)21 of the Tennessee Air Pollution Control Regulations, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty (30) days of the change. The notification shall include the name and title of the new Responsible Official and certification of truth and accuracy. All representations, agreement to terms and conditions, and covenants made by the former Responsible Official that were used in the establishment of the permit terms and conditions 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/or covenants.

(b) The revised application that was utilized in the preparation of this permit is dated March 22, 2012 and identified Eric Hunsberger as the Principal Technical Contact for the permitted facility. The application used in the preparation of Significant Modification #1 is dated September 2, 2022, and identifies Eric Hunsberger as the Principal Technical Contact for the permitted facility. Jim Taylor is the current Technical Contact for the permitted facility per the minor modification application dated April 27, 2023. If this person terminates their employment or is assigned different duties such that she is no longer the Principal Technical Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty (30) days of the change. The notification shall include the name and title of the new Principal Technical Contact and certification of truth and accuracy.

(c) Correspondence from the facility dated December 7, 2018, identifies Don Norton as the Billing Contact for the permitted facility. The application used in the preparation of Significant Modification #1 is dated September 2, 2022, and identifies Don Norton as the Billing Contact for the permitted facility. If this person terminates their employment or is assigned different duties such that he is no longer the Billing Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty (30) days of the change. The notification shall include the name and title of the new Billing Contact and certification of truth and accuracy.

TAPCR 1200-03-09

- E3-5.** Routine maintenance, as required to maintain specified emission limits, shall be performed on the air pollution control device(s). Maintenance records shall be recorded in a suitable permanent form and kept available for inspection by the Division or by EPA. These records must be retained for a period of not less than five years.

TAPCR 1200-03-09

- E3-6.** This facility is subject to the Greenhouse Gas (GHGs) Reporting Rule 40 CFR Part 98. Therefore the permittee shall report the GHGs from this facility on an annual basis.

40 CFR Part 98

All requests, notifications, and communications to the Administrator pursuant to this part must be submitted electronically and in a format as specified by the Administrator.

(a) For U.S. mail. Director, Climate Change Division, 1200 Pennsylvania Ave., NW., Mail Code: 6207J, Washington, DC 20460.

(b) For package deliveries. Director, Climate Change Division, 1310 L St, NW., Washington, DC 20005.

- E3-7.** Record keeping requirements for this facility, including all data and calculations, must be updated and maintained based on the following schedule:

<u>Record Keeping Type</u>	<u>Update Requirement</u>
Monthly Log	Recorded within 30 days after the end of the month
Weekly Log	Recorded within 7 days after the end of the week
Daily Log	Recorded within 7 days after the end of the day

TAPCR 1200-03-09

- E3-8.** Upon the malfunction/failure of any emission control device(s) serving this source, the operation of the processes served by the device(s) shall be regulated by Chapter 1200-03-20 of the Tennessee Air Pollution Control Regulations.

TAPCR 1200-03-20

- E3-9.** The permittee listed various insignificant and exempt activities in their Title V Application per Rule 1200-03-09-.04(5). Additional insignificant activities may be added and operated at any time with the provision that a written notification shall be submitted to the Technical Secretary including an updated APC V.2 application form along with a truth, accuracy, and completeness statement signed by a responsible official.

TAPCR 1200-03-09

E3-10. Reserved – removed in Significant Modification #1

E3-11. Reserved – removed in Significant Modification #1

E3-12. Reserved – removed in Significant Modification #1

E3-13. Reserved – removed in Significant Modification #1

E3-14. Reserved – removed in Significant Modification #1

- E3-15.** The permittee shall prepare, submit, and implement a Preventative Maintenance Plan for fugitive emissions from the process buildings and process equipment within 180 days of issuance of this permit. The plan shall address the prevention of malfunctions and excess emissions from building openings and process equipment.

The plan at a minimum shall contain the following elements:

1. Identification of the process buildings and process equipment,
2. Type and frequency of monitoring,
3. Type and frequency of preventative maintenance,
4. Identification of persons responsible for implementation, and
5. How and what type of records of monitoring and maintenance activities.

The Permittee must comply with all of the provisions of the Preventative Maintenance Plan as submitted to the Technical Secretary. If the Permittee determines that any revisions of the Preventative Maintenance Plan are necessary or appropriate, the Permittee may revise the Preventative Maintenance Plan but such revisions will not become effective until the Permittee submits a description of the changes and a revised plan incorporating them to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(e)1.(i)

- E3-16.** You must within 180 days prepare, and thereafter operate at all times according to, a written operation and maintenance (O&M) plan for each control device for an emissions source and for the product baghouses 700 and 800. You must maintain a copy of the O&M plan at the facility and make it available for review upon request. At a minimum, each plan must contain the following information:

- (1) General facility and contact information;

(2) Positions responsible for inspecting, maintaining, and repairing emissions control devices which are used to comply with this requirement;

(3) Description of items, equipment, and conditions that will be inspected, including an inspection schedule for the items, equipment, and conditions. For Product Baghouse 700 and Product Baghouse 800, the O&M plan must include the items required by Conditions E10-9 and -10 and E11-7 and -8, respectively.

(4) Identity and estimated quantity of the bags, filter media, and similar replacement parts that will be maintained in inventory.

You may use any other O&M, preventative maintenance, or similar plan which addresses the requirements in paragraph (1) through (4) of this condition to demonstrate compliance with the requirements for an O&M plan. Multiple control devices may be included in a single O&M plan.

TAPCR 1200-03-09-.02(11)(e)1.(i)

Source 100: Railcar Unloading Operation (73-0107-01)	The rail unloading takes place inside a Rail Unloading Building and is controlled with a fabric filter. Fabric Filter RW-800-BC-1. Stack S100 (50,000 scfm).
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- E4-1.** Particulate matter emitted from Baghouse RW-800-BC-1 shall not exceed 0.015 grains per dry standard cubic foot (6.1 pounds per hour).

This emission limitation is established pursuant to Rule 1200-03-07-.01(5) of the Tennessee Air Pollution Control Regulations and the application dated March 21, 2012.

Compliance Method: Stack test dated February 12, 2013, shows the actual emissions to be within the allowable emissions. Compliance shall be assured by maintaining the pressure drop across the baghouse at greater than or equal to 1 inch of water and by adhering to the current O&M plan as identified in Condition E3-16. The pressure drop shall be recorded once daily when the source is operational. Records of pressure drop and source operation shall be maintained to readily show compliance with this requirement.

- E4-2.** Lead, chromium, and cadmium emitted from Baghouse RW-800-BC-1 shall not exceed 5.79, 22.3, and 22.3 pounds per month, respectively.

This emission limitation is established pursuant to Rule 1200-03-07-.01(5) of the Tennessee Air Pollution Control Regulations and the application dated March 21, 2012. The compliance assurance information is contained in the letter dated November 13, 2015, from the permittee.

Compliance Method: Stack test dated February 12, 2013, shows the actual emissions to be within the allowable emissions. Compliance with condition E4-1 shall assure compliance with this condition.

- E4-3.** To assure that the catch materials of the baghouses do not create a fugitive dust emissions problem while being disposed of or recycled, the openings of the collection bins and the collected materials shall be covered prior to any transfer from the control device.

TAPCR 1200-03-08

Source 200: Conditioning and Blending Building (CBB) (73-0107-01)	Conditioning and blending occurs in a closed Conditioning and Blending Building (CBB). No fugitive emissions expected. Fabric Filter RW-800-BC-3. Stack S200 (50,000 scfm).
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- E5-1.** Unloading of Zinc bearing feed materials from trucks shall be done within the enclosed CBB.

TAPCR 1200-03-09 and approved application dated March 21, 2012.

Compliance Method: Compliance with this condition shall be assured by annual certification. Certifications shall be submitted in accordance with condition E2.

- E5-2.** Particulate matter emitted from Baghouse RW-800-BC-3 shall not exceed 0.015 grains per dry standard cubic foot (3.4 pounds per hour).

This emission limitation is established pursuant to Rule 1200-03-07-.01(5) of the Tennessee Air Pollution Control Regulations and the information contained in the application dated March 21, 2012, from the permittee.

Compliance Method: Stack test conducted on February 12-13, 2013 on this source showed emissions to be within the allowable limits. Compliance shall be assured by maintaining the pressure drop across the baghouse at greater than or equal to 1.0 inch of water and by adhering to the current O&M plan identified in Condition E3-16. The pressure drop shall be recorded once daily when the source is operational. Records of pressure drop and source operation shall be maintained to readily show compliance with this requirement.

- E5-3.** Lead, chromium, and cadmium emitted from the Baghouse RW-800-BC-3 shall not exceed 5.58, 22.3, and 22.3 pounds per month respectively.

This emission limitation is established pursuant to Rule 1200-03-07-.01(5) of the Tennessee Air Pollution Control Regulations and the application dated March 21, 2012. The compliance assurance information is contained in the letter dated November 13, 2015, from the permittee.

Compliance Method: Stack test conducted on February 12-13, 2013 on this source showed emissions to be within the allowable limits. Compliance with condition E5-2 shall assure compliance with this condition.

Source 300: Outdoor Storage and Material handling (73-0107-02/08)	The process input materials outdoor handling operations consist of unloading from trucks, storage in storage piles, and moving from storage piles to conveyor (EC #2) via front end loader or other loading equipment. Screening of IRM for size.
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- E6-1.** The allowed process input materials for outdoor handling operations are IRM, coal and coke reductants.

TAPCR 1200-03-09 and application dated March 21, 2012

Compliance Method: Compliance with this condition shall be assured by annual certification. Certifications shall be submitted in accordance with condition E2.

- E6-2.** Particulate matter emitted from this source shall not exceed 1.0 pound per hour on a daily average basis.

TAPCR 1200-03-09-.03(8)

Compliance Method: Compliance with this limit will be assured by condition E6-4.

- E6-3.** Fugitive emissions from storage piles and associated material handling operations shall not exhibit greater than ten percent (10%) opacity, except for one (1) six-minute period in any one (1) hour period and for no more than four (4) six-minute periods in any twenty-four (24) hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

TAPCR 1200-03-08-.03

This emission limitation is established pursuant to the permittee's request in the application dated March 21, 2012.

Compliance Method: The visible emissions may be evaluated as and when required by the Technical Secretary.

- E6-4.** Wet suppression must be applied at the fugitive dust sources as necessary to comply with the standards in this permit.

TAPCR 1200-03-08

Compliance Method: The compliance method is included in the requirement. Compliance with this condition shall be assured by annual certification. Certifications shall be submitted in accordance with condition E2.

- E6-5.** The wet suppression system should be maintained in good working condition in order to provide sufficient water pressure to effectively control fugitive emissions.

TAPCR 1200-03-08

Compliance Method: Compliance with this condition shall be assured by annual certification. Certifications shall be submitted in accordance with condition E2.

- E6-6.** Water runoff from the wet suppression system shall be controlled in such a fashion that ground contamination does not occur.

TAPCR 1200-03-08

Compliance Method: The compliance method is included in the requirement. Compliance with this condition shall be assured by annual certification. Certifications shall be submitted in accordance with condition E2.

Source 400: Plant conveyors and transfer points (73-0107-15)	Three cartridge filters for three transfer conveyors. Conveyor bc205 to bc208 (stack no: 401). Conveyor bc208 to bc300 (stack no: 402). Conveyor bc301 to bc308 (stack no: 403).
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- E7-1.** Particulate matter emitted from cartridge fabric filters 401, 402, and 403 on the three conveyors shall not exceed 0.02 grains per dry standard cubic foot each (1.64 pounds per hour total).

1200-03-07-.04(1)

Compliance Method: Particulate matter emissions of 0.068 pounds per hour total (0.016 lb/hr for 401, 0.029 lb/hr for 402 and 0.023 lb/hr for 403) measured by the stack test conducted on August 20-21, 2013, demonstrated compliance with this limit.

Continuous compliance will be assured by maintaining pressure drop across the baghouses at greater than or equal to 1 inch of water and by adhering to the current O&M plan identified in Condition E3-16. The pressure drop shall be recorded once daily when the source is operational. Records of pressure drop and source operation shall be maintained to readily show compliance with this requirement.

- E7-2.** Lead, chromium, and cadmium emissions from conveyor cartridge fabric filters 401, 402 and 403 combined shall not exceed 1.93, 0.32, and 0.10 pounds per month respectively.

This emission limitation is established pursuant to Rule 1200-03-07-.01(5) of the Tennessee Air Pollution Control Regulations and the application dated March 21, 2012. The compliance assurance information is contained in the letter dated November 13, 2015, from the permittee.

Compliance Method: Stack test conducted on August 20-21, 2013 on this source showed emissions to be within the allowable limits. Compliance with condition E7-1 shall assure compliance with this condition.

- E7-3.** To assure that the catch materials of the filter do not create a fugitive dust emissions problem while being disposed of or recycled, the openings of the collection bins and the collected materials shall be covered prior to any transfer from the control device.

TAPCR 1200-03-07-.07(2)

Compliance Method: Compliance with this condition shall be assured by covering the openings of the bins prior to transferring the material and by annual certification. Certifications shall be submitted in accordance with condition E2.

Source 500: Iron rich material (IRM) handling and crushing process (73-0107-04)	Crushing inside a building occurs on a periodic contract basis. No stacks. Open door acts as stack. IRM Cooler with Dust Pickup Hood and Bag Collector, Conveyor, IRM Storage Building with Crusher. Wet Suppression Control.
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E8-1. The material input rate for the crusher shall not exceed 200 tons per hour of Iron Rich Material and Refractory on a daily average basis.

TAPCR 1200-03-09-.03(8)

Compliance Method: Process input rate shall be recorded on a once daily basis in the format given below.

Day/month	Material crushed (tons)	Operating hours	Input rate (tons/hr) Daily average basis

E8-2. Particulate matter emitted from this source shall not exceed 2.5 lb/hr on a daily average basis.

The particulate matter emissions are established pursuant to Rule 1200-03-07-.01(5) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated May 27, 2014, from the permittee.

Compliance Method: Compliance with this emission limitation shall be assured by complying with Conditions E8-1, E8-4, and E8-5.

E8-3. Lead emitted from this source shall not exceed 5.58 pounds per month.

The lead emissions are established pursuant to Rule 1200-03-07-.01(5) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated May 27, 2014, from the permittee.

Compliance Method: Compliance with this emission limitation shall be assured by complying with conditions E8-1, E8-4 and E8-5.

E8-4. The wet suppression system should be maintained in good working condition in order to provide sufficient water pressure to effectively control fugitive emissions.

TAPCR 1200-03-08

Compliance Method: Compliance with this condition shall be assured by maintaining the wet suppression system in good working order and by annual certification. Certifications shall be submitted in accordance with condition E2.

E8-5. Water runoff from the wet suppression system shall be controlled in such a fashion that ground contamination does not occur.

TAPCR 1200-03-08

Compliance Method: Compliance with this condition shall be assured by controlling the water runoff and by annual certification. Certifications shall be submitted in accordance with condition E2.

Source 600: Feed Building (FB) (73-0107-14) and Pneumatic Railcar/Truck Unloading (73-0107-09)	Four Pneumatic Transfer Lines and Four Silos with bin vent fabric filters 351, 352, 357 and 358 exhausting inside the PD Feed Tower. Indoor Handling Operations in the Feed building, Baghouse 460.
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E9-1. Particulate matter emitted from Feed Building Baghouse 460 shall not exceed 1.03 pounds per hour averaged on a daily basis.

This emission limitation is established pursuant to Rule 1200-03-07-.01(5) of the Tennessee Air Pollution Control Regulations and the proposed limit from the permittee contained in the application dated March 21, 2012.

Compliance Method: Stack test dated February 13, 2013 shows the actual emissions to be within the allowable emissions. Compliance shall be assured by maintaining the pressure drop across the baghouse at greater than or equal to 1.0 inch of water and by adhering to the current O&M plan identified in Condition E3-16. The pressure drop shall be recorded once daily when the source is operational. Records of pressure drop and source operation shall be maintained to readily show compliance with this requirement.

E9-2. Lead, chromium, and cadmium emissions from Feed Building Baghouse 460 shall not exceed 10.9, 3.05, and 0.29 pounds per month respectively.

This emission limitation is established pursuant to Rule 1200-03-07-.01(5) of the Tennessee Air Pollution Control Regulations and the application dated March 21, 2012. The compliance assurance information is contained in the letter dated November 13, 2015, from the permittee.

Compliance Method: Stack test dated February 13, 2013 shows the actual emissions to be within the allowable emissions. Compliance with condition E9-1 shall assure compliance with this condition.

E9-3. To assure that the catch materials of the baghouse does not create a fugitive dust emissions problem while being disposed of or recycled, the openings of the collection bins and the collected materials shall be covered prior to any transfer from the control device.

TAPCR 1200-03-07-.07(2)

Compliance method: Compliance with this condition shall be assured by covering the openings of the bins prior to transferring the material and by annual certification. Certifications shall be submitted in accordance with condition E2.

E9-4. Particulate matter emitted from pneumatic railcar unloading and the silo bin vent collectors shall not exceed 0.02 grains per dry standard cubic foot (1.9 pounds per hour).

This emission limitation is established pursuant to Rule 1200-03-07-.01(5) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated March 21, 2012, from the permittee.

Compliance Method: The source controlled by the bin vent filters shall not operate unless the control device is in operation. These bin vent filters exhaust inside the building.

E9-5. The source controlled by the air pollution control device shall not operate unless the control device is in operation. In the event a malfunction/failure of a control device occurs, the operation of the process controlled by the control device shall be regulated by the provisions of Chapter 1200-03-20 of the Tennessee Air Pollution Control Regulations.

TAPCR 1200-03-09-.03(8)

Source 700: Waelz Kiln #1 (73-0107-03)	Product (CZO) and IRM discharge. Product Baghouse 700 and IRM Baghouse 701.
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E10-1. The total material input (zinc bearing feed material and coke/coal) for this source shall not exceed 30,000 pounds per hour on a daily average basis.

TAPCR 1200-03-09 and the approved application dated May 3, 2013.

Compliance Method: A daily log shall be maintained at the source location in a format that shows compliance with this condition.

Day/month	Material input (Zinc bearing material and coke/coal) pounds /day	Operating hours	Input rate (lbs/hr) Daily average basis

E10-2(MM1). The gas burner capacity shall not exceed 42 MM Btu/hr.

TAPCR 1200-03-09 and the approved application dated July 11, 2017.

Compliance Method: Compliance with this condition shall be assured by annual certification. Certifications shall be submitted in accordance with condition E2.

E10-3. Natural gas and No. 2 fuel oil only shall be used as fuel for this source.

TAPCR 1200-03-09 and approved applications dated May 3, 2013.

Compliance Method: Compliance shall be assured from the log in condition E10-6.

E10-4. The sulfur content of No. 2 fuel oil burned in this source shall not exceed 0.5% by weight.

This limitation is established pursuant to Rule 1200-03-14-.01(3) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated September 15, 2009, from the permittee.

Compliance Method: Vendor-supplied certifications of fuel oil sulfur content must be obtained for each individual fuel shipment, or alternatively, the vendor may supply a statement to the effect that all no. 2 fuel oil will contain no more than 0.5 % sulfur by weight. These certifications must be maintained at the source location and kept available for inspection by the Technical Secretary. These certifications must be retained for a period of not less than five years.

E10-5. There shall be no provisions for the construction and/or operation of a bypass stack at this source.

TAPCR 1200-03-09 and previous permit 056946P

E10-6. The No. 2 fuel oil usage at this source shall not exceed 20,000 gallons during all intervals of 12 consecutive months.

This emission limitation is established pursuant to Rule 1200-03-07-.01(5) of the Tennessee Air Pollution Control Regulations and the information contained in the application dated May 3, 2013, from the permittee.

Compliance Method: A monthly and yearly log shall be maintained to assure compliance with this limitation.

Yearly log

Month/year	Natural gas usage (cu.ft)	Natural gas usage (cu.ft) 12 consecutive months	#2 Fuel Oil Usage (gallons)	#2 Fuel Oil Usage (gallons) 12 consecutive months

E10-7. Particulate matter emissions from this source shall not exceed 0.02 grains per dry standard cubic foot (15.71 pounds per hour).

TAPCR 1200-03-07-.04(1)

Compliance Method Compliance with this particulate matter limitation shall be assured by operating a bag leak detection system for Product Baghouse 700 in accordance with the O&M plan, and by maintaining a minimum pressure drop of 1.0 inches of water column on IRM Baghouse 701. Records related to bag leak detection alarms shall be kept as required by condition E10-10 below. The pressure drop for IRM Baghouse 701 shall be recorded once daily when the source is operational. Records of IRM Baghouse 701 pressure drop and source operation shall be maintained to readily show compliance with this requirement.

E10-8. The permittee shall install, operate, and maintain a bag leak detection system for Product Baghouse 700. The bag leak detection system shall be installed within 180 days of the issuance of this permit. The system shall be able to detect leaks in every cell of the bag house. Operation of the bag leak detection system shall be in accordance with the current O&M plan.

The bag leak detection system must meet the requirements in the following paragraphs:

- (1) Each bag leak detection system must be installed, calibrated, operated, and maintained according to the manufacturer's operating instructions.
- (2) The manufacturer's specifications for the bag leak detection system must state that it is capable of detecting PM emissions at concentrations of 10 milligrams per actual cubic meter or less.
- (3) The bag leak detection system must be equipped with a device to record any alarm events described in (4) below.
- (4) The bag leak detection system must be equipped with an alarm system that will automatically alert plant operating personnel when an increase in relative PM emissions over a preset level is detected. The alarm must be located where it is easily recognized by plant operating personnel.
- (5) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.

1200-03-09-02(11)(e)1(iii)I)III

E10-9. The permittee must prepare a site-specific monitoring plan for each bag leak detection system to be incorporated in your O&M plan. You must operate and maintain each bag leak detection system according to the plan at all times. Each plan must address all of the items identified in the following paragraphs:

- (1) Installation of the bag leak detection system.
- (2) Initial and periodic adjustment of the bag leak detection system including how the alarm set-point will be established.
- (3) Operation of the bag leak detection system including quality assurance procedures.
- (4) Maintenance of the bag leak detection system including a routine maintenance schedule and spare parts inventory list.
- (5) How the bag leak detection system output required to be recorded will be recorded and stored.
- (6) Procedures for determining what corrective actions are necessary in the event of a bag leak detection alarm as required in condition E10-10.

TAPCR 1200-03-09-.03(8)

E10-10. In the event that a bag leak detection system alarm is triggered, you must initiate corrective action to determine the cause of the alarm within 1 hour of the alarm, initiate corrective action to correct the cause of the problem within 24 hours of the alarm, and complete corrective action as soon as practicable, but no later than 10 calendar days from the date of the alarm. You must record the date and time of each valid alarm, the time you initiated corrective action, the correction action taken, and the date on which corrective action was completed. Corrective actions may include, but are not limited to:

- (1) Inspecting the bag house for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in emissions.

- (2) Sealing off defective bags or filter media.
- (3) Replacing defective bags or filter media or otherwise repairing the control device.
- (4) Sealing off a defective baghouse department.
- (5) Cleaning the bag leak detection system probe, or otherwise repairing the bag leak detection system.
- (6) Shutting down the process producing the particulate emissions.

TAPCR 1200-03-09-.03(8)

- E10-11.** Sulfur Dioxide emissions from this source shall not exceed 2.20 pounds per hour on a daily average basis.

TAPCR 1200-03-14-.01(3), Application dated March 21, 2012

Compliance Method: Compliance is based on the emission factor of 0.065 lbs per ton of material input, derived from the stack test conducted on September 22, 2011. The input rate of 15 tons per hour, using the emission factor of 0.065 lb/ton would be 0.975 pounds per hour which is below the allowable emission rate. Compliance with condition E10-1 assures compliance with this condition.

- E10-12.** Lead emissions from this source shall not exceed 111.6 pounds per month total.

This emission limitation is established pursuant to Rule 1200-03-07-.01(5) of the Tennessee Air Pollution Control Regulations and the application dated March 21, 2012. The compliance assurance information is contained in the letter dated November 13, 2015 from the permittee.

Compliance Method: Compliance is based on emission factor of 0.001 pounds per ton of material input developed during the stack test on September 22, 2011. The input rate of 15 tons per hour, using the emission factor of 0.001 lb/ton would be 0.015 pounds per hour. Compliance with conditions E10-1 and E10-7 assure compliance with this condition.

- E10-13.** Volatile Organic Compounds (VOC) from this source shall not exceed 15.45 pounds per hour averaged on a daily basis.

TAPCR 1200-03-07-.07(2)

Compliance method: Compliance is based on emission factor of 1.0 pounds per ton of material input developed during the stack test on September 22, 2011. The input rate of 15 tons per hour, using the emission factor of 1.03 lb/ton would be 15.45 pounds per hour which is the same as the allowable emission rate. Compliance with condition E10-1 assures compliance with this condition.

- E10-14.** Nitrogen Oxides (NOx) from this source shall not exceed 18.17 pounds per hour on a daily average basis.

TAPCR 1200-03-07-.07(2)

Compliance method: Compliance is based on emission factor of 1.0 pounds per ton of material input developed during the stack test on September 22, 2011. The input rate of 15 tons per hour, using the emission factor of 1.0 lb/ton would be 15.0 pounds per hour which is below the allowable emission rate. Compliance with condition E10-1 assures compliance with this condition.

- E10-15.** Carbon monoxide (CO) from this source shall not exceed 21.40 pounds per hour on a daily average basis.

TAPCR 1200-03-07-.07(2)

Compliance method: Compliance is based on emission factor of 0.90 pounds per ton of material input developed during the stack test on September 22, 2011. The input rate of 15 tons per hour, using the emission factor of 0.90 lb/ton would be 13.5 pounds per hour which is below the allowable emission rate. Compliance with condition E10-1 assures compliance with this condition.

Source 800: Waelz Kiln #2 (73-0107-10/11)	Product (CZO) Stack S800 and IRM discharge S801. Product Baghouse 800, IRM Baghouse 801, Bucket elevator fabric filter -802.
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E11-1. The total material input (zinc bearing feed material and coke/coal) for this source shall not exceed 42,000 pounds per hour (lb/hr) on a daily average basis.

TAPCR 1200-03-09 and the approved application dated March 21, 2012.

Compliance Method: A daily log shall be maintained at the source location in a format that shows compliance with this condition.

Day/month	Material input (Zinc bearing material and coke/coal) pounds/day	Operating hours per day	Input rate (lbs/hr) Daily average basis

E11-2. Only natural gas or No. 2 fuel oil shall be used as fuel for this source.

TAPCR 1200-03-09 and the approved application dated March 21, 2012.

Compliance Method: Compliance will be assured by condition E11-3.

E11-3. No. 2 fuel oil combustion shall not exceed 83,330 gallons during all intervals of 12 consecutive months.

This limitation is established pursuant to Rule 1200-03-14-.01(3) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated September 15, 2009, from the permittee.

Compliance Method: A monthly log shall be maintained to assure compliance with this limitation.

Yearly log

Month/year	Natural gas usage (cu.ft)	Natural gas usage (cu.ft) 12 consecutive months	#2 Fuel Oil Usage (gallons)	#2 Fuel Oil Usage (gallons) 12 consecutive months

E11-4. The sulfur content of No. 2 fuel oil burned in this source shall not exceed 0.5% by weight.

This limitation is established pursuant to Rule 1200-03-14-.01(3) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated September 15, 2009, from the permittee.

Compliance Method: Vendor-supplied certifications of fuel oil sulfur content must be obtained for each individual fuel shipment, or alternatively, the vendor may supply a statement to the effect that all no. 2 fuel oil will contain no more than 0.5 % sulfur by weight. These certifications must be maintained at the source location and kept available for inspection by the Technical Secretary. These certifications must be retained for a period of not less than five years.

E11-5. Particulate matter emitted from this source shall not exceed 9.9 pounds per hour.

This emission limitation is established pursuant to Rule 1200-03-07-.01(5) of the Tennessee Air Pollution Control Regulations and the information contained in the application dated March 21, 2012, from the permittee.

Compliance Method Compliance with this particulate matter limitation shall be assured by operating a bag leak detection system for Product Baghouse 800 in accordance with the O&M plan, and by maintaining a minimum pressure drop of 1.0 inches of water column on IRM Baghouse 801 and Bucket Elevator Fabric Filter 802. Records related to bag leak detection alarms shall be kept as required by condition E11-8 below. The pressure drop for IRM Baghouse 801 and Bucket Elevator Fabric Filter 802 shall be recorded once daily when the source is operational. Records of IRM Baghouse 801 and Bucket Elevator Fabric Filter 802 pressure drop and source operation shall be maintained to readily show compliance with this requirement.

E11-6. The permittee shall install, operate, and maintain a bag leak detection system for Product Baghouse 800. The bag leak detection system shall be installed within 180 days of the issuance of this permit. The system shall be able to detect leaks in every cell of the bag house. Operation of the bag leak detection system shall be in accordance with the current O&M plan.

The bag leak detection system must meet the requirements in the following paragraphs:

- (1) Each bag leak detection system must be installed, calibrated, operated, and maintained according to the manufacturer's operating instructions.
- (2) The manufacturer's specifications for the bag leak detection system must state that it is capable of detecting PM emissions at concentrations of 10 milligrams per actual cubic meter or less.
- (3) The bag leak detection system must be equipped with a device to record any alarm events described in (4) below.
- (4) The bag leak detection system must be equipped with an alarm system that will automatically alert plant operating personnel when an increase in relative PM emissions over a preset level is detected. The alarm must be located where it is easily recognized by plant operating personnel.
- (5) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.

1200-03-09-02(11)(e)1(iii)(I)III

E11-7. The permittee must prepare a site-specific monitoring plan for each bag leak detection system to be incorporated in your O&M plan. You must operate and maintain each bag leak detection system according to the plan at all times. Each plan must address all of the items identified in the following paragraphs:

- (1) Installation of the bag leak detection system.
- (2) Initial and periodic adjustment of the bag leak detection system including how the alarm set-point will be established.
- (3) Operation of the bag leak detection system including quality assurance procedures.
- (4) Maintenance of the bag leak detection system including a routine maintenance schedule and spare parts inventory list.
- (5) How the bag leak detection system output required to be recorded will be recorded and stored.
- (6) Procedures for determining what corrective actions are necessary in the event of a bag leak detection alarm as required in condition E11-8.

TAPCR 1200-03-09-.03(8)

E11-8. In the event that a bag leak detection system alarm is triggered, you must initiate corrective action to determine the cause of the alarm within 1 hour of the alarm, initiate corrective action to correct the cause of the problem within 24 hours of the

alarm, and complete corrective action as soon as practicable, but no later than 10 calendar days from the date of the alarm. You must record the date and time of each valid alarm, the time you initiated corrective action, the correction action taken, and the date on which corrective action was completed. Corrective actions may include, but are not limited to:

- (1) Inspecting the bag house for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in emissions.
- (2) Sealing off defective bags or filter media.
- (3) Replacing defective bags or filter media or otherwise repairing the control device.
- (4) Sealing off a defective baghouse department.
- (5) Cleaning the bag leak detection system probe, or otherwise repairing the bag leak detection system.
- (6) Shutting down the process producing the particulate emissions.

TAPCR 1200-03-09-.03(8)

E11-9. Sulfur Dioxide (SO₂) emitted from this source shall not exceed 14.88 pounds per hour, based on a daily average.

This emission limitation is established pursuant to Rule 1200-03-14-.01(3) and the application dated March 21, 2012.

Compliance Method: Compliance is based on emission factor of 0.065 pounds per ton of material input developed during the stack test on June 15, 2011. The input rate of 21 tons per hour, using the emission factor of 0.065 lb/ton would be 1.36 pounds per hour which is below the allowable emission rate. Compliance with condition E11-1 assures compliance with this condition.

E11-10. Carbon Monoxide (CO) emitted from this source shall not exceed 92.80 tons during all intervals of 12 consecutive months.

TAPCR 1200-03-07-.07(2)

Compliance Method: Compliance is based on emission factor of 0.90 pounds per ton of material input developed during the stack test on June 15, 2011. The input rate of 21 tons per hour, using the emission factor of 0.90 lb/ton would be 21.24 pounds per hour which is below the allowable emission rate. Compliance with condition E11-1 assures compliance with this condition.

E11-11. Volatile Organic Compounds (VOCs) emitted from this source shall not exceed 95.36 tons during all intervals of 12 consecutive months.

TAPCR 1200-03-07-.07(2)

Compliance Method: Compliance is based on emission factor of 1.03 pounds per ton of material input developed during the stack test on June 15, 2011. The input rate of 21 tons per hour, using the emission factor of 1.03 lb/ton would be (21.63 pounds per hour) 94.74 tons per year which is below the allowable 12 consecutive months emission rate. Compliance with condition E11-1 assures compliance with this condition.

E11-12. Nitrogen Oxides (NO_x) emitted from this source shall not exceed 93.21 tons during all intervals of 12 consecutive months.

TAPCR 1200-03-07-.07(2).

Compliance Method: Compliance is based on emission factor of 1.0 pounds per ton of material input developed during the stack test on June 15, 2011. The input rate of 21 tons per hour, using the emission factor of 1.0 lb/ton would be (21.0 pounds per hour) 91.98 which is below the allowable 12 consecutive month emission rate. Compliance with condition E11-1 assures compliance with this condition.

E11-13. Lead (Pb) emitted from three baghouses associated with Kiln #2 shall not exceed 260 pounds per month total.

This emission limitation is established pursuant to Rule 1200-03-07-.01(5) of the Tennessee Air Pollution Control Regulations and the application dated March 21, 2012. The compliance assurance information is contained in the letter dated November 13, 2015 from the permittee.

Compliance Method: Compliance is based on emission factor of 0.001 pounds per ton of material input developed during the stack test on June 15, 2011. The input rate of 21 tons per hour, using the emission factor of 0.001 lb/ton would be 0.021 pounds per hour. Compliance with condition E11-1 and E11-5 assures compliance with this condition.

E11-14(MM1). Visible emissions from S800, S802 shall not exhibit greater than twenty percent (20%) opacity, except for one (1) six-minute period in any one (1) hour period and for no more than four (4) six-minute periods in any twenty-four (24) hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average). TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.01(1)

This emission limitation is established pursuant to Rule 1200-03-05-.01(3) of the Tennessee Air Pollution Control Regulations and the information contained in the application dated July 11, 2017, from the permittee.

Compliance Method: Compliance with this opacity limitation shall be certified through utilization of the Division's Opacity Matrix dated June 18, 1996, amended September 11, 2013, using EPA Method 9 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened pursuant to Condition A13 to impose additional opacity monitoring.

Source 900	Pneumatic railcar loading operation (73-0107-05)	Conveying and Loading Operations. 1 Silo, Baghouse Control with a fabric filter on the load out operation (1,460scfm). 1 Storage Bin RW-800-BV-1, Bin vent filter (3000 scfm) .
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E12-1. Particulate matter emitted from this source shall not exceed 0.02 grain per dry standard cubic foot (0.76 pounds per hour).

This emission limitation is established pursuant to Rule 1200-03-07-.01(5) of the Tennessee Air Pollution Control Regulations and the information contained in the application dated January 17, 2014, from the permittee.

Compliance Method: Compliance with this limitation shall be assured by maintaining the pressure drop across the baghouse at greater than or equal to 1.0 inch of water and by adhering to the current O&M plan as identified in Condition E3-16. The pressure drop shall be recorded once daily when the source is operational. Records of pressure drop and source operation shall be maintained to readily show compliance with this requirement.

END OF SIGNIFICANT MODIFICATION #1 TO PERMIT NO. 562547

ATTACHMENT 1
OPACITY MATRIX DECISION TREE for VISIBLE EMISSION
EVALUATION METHOD 9

Dated June 18, 1996, Amended September 11, 2013

**Decision Tree PM for Opacity for
Sources Utilizing EPA Method 9***

Notes:

PM = Periodic Monitoring required by 1200-03-09-.02(11)(e)(iii).

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring and testing requirements of Title V for demonstrating compliance with the visible emission standards set forth in the permit. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring – Proposed 40 CFR 64).

Examine each emission unit using this Decision Tree to determine the PM required.*

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing EPA Method 9. The observer must be properly certified to conduct valid evaluations.

Typical Pollutants
Particulates, VOC, CO, SO₂, NO_x, HCl, HF, HBr, Ammonia, and Methane.

Initial observations are to be repeated within 90 days of startup of a modified source, if a new construction permit is issued for modification of the source.

A VEE conducted by TAPCD personnel after the Title V permit is issued will also constitute an initial reading.

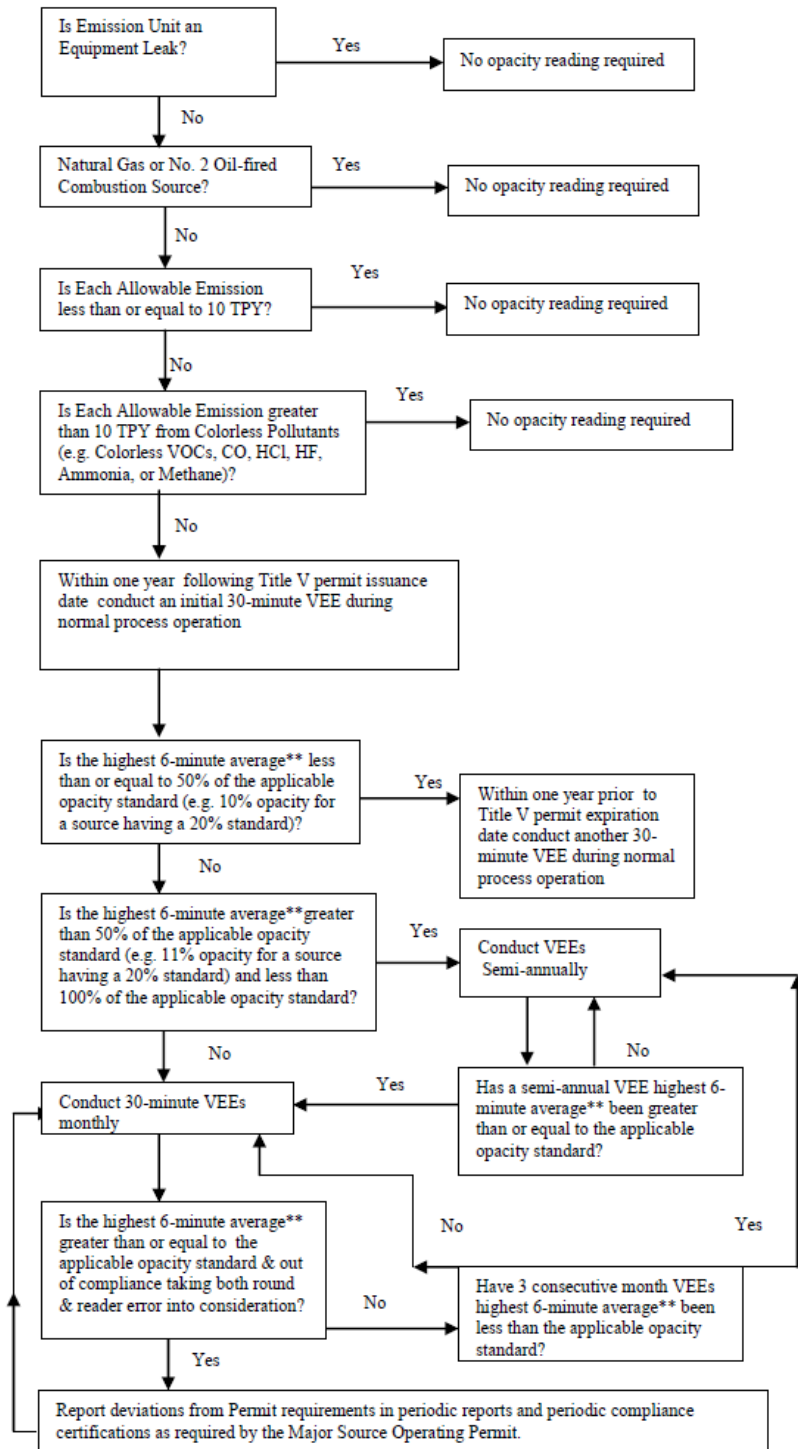
Reader Error
EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards:
The TAPCD guidance is to declare non-compliance when the highest six-minute average** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

EPA Method 9, NSPS or NESHAPS stipulate opacity standards:
EPA guidance is to allow only engineering round. No allowance for reader error is given.

*Not applicable to Asbestos manufacturing subject to 40 CFR 61.142

**Or second highest six-minute average, if the source has an exemption period stipulated in either the regulations or in the permit.

Dated June 18, 1996
Amended September 11, 2013



Addendum to
TITLE V PERMIT STATEMENT

Facility Name: Befesa Zinc US Inc.

City: Rockwood

County: Roane

Date Application Received: March 21, 2012
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Date Application Deemed Complete: April 23, 2012

Emission Source Reference No.: 73-0107

Permit No.: 562547

INTRODUCTION

This narrative is being provided to assist the reader in understanding the content of the attached Title V operating permit. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-03-09-.02(11)(f)1.(v). The primary purpose of the Title V operating permit is to consolidate and identify existing state and federal air requirements applicable to **Befesa Zinc US Inc.** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

Acronyms

PSD - Prevention of Significant Deterioration
NESHAP - National Emission Standards for Hazardous Air Pollutants
NSPS - New Source Performance Standards
MACT - Maximum Achievable Control Technology
NSR - New Source Review

I. Identification Information

A. Source Description: Secondary Zinc Recycling. The individual sources are:

- | | |
|--|---|
| Source 100: Railcar Unloading | Source 700: Waelz Kiln #1 |
| Source 200: Conditioning and Blending Building | Source 800: Waelz Kiln #2 |
| Source 300: Outdoor Storage and handling | Source 900: Rail loading Operations |
| Source 400: Plant conveyors | Source 1000: Kiln #1 Emergency Generator 1 (insig.) |
| Source 500: IRM material crushing building | Source 1100: Kiln #2 Emergency Generator (insig.) |
| Source 600: Pneumatic railcar/truck unloading
and Feed Building | Source 1200: Kiln #1 Emergency generator 2 (insig.) |

B. Facility Classification

1. Attainment or Non-Attainment Area Location: Area is designated as an attainment area for all criteria pollutants.
2. Company is not located in a Class I area or Class III area.

C. Regulatory Status

1. PSD/NSR: This facility is not a major source under PSD.
2. Title V Major Source Status by Pollutant

Pollutant	Is the pollutant emitted?	If emitted, what is the facility's status?	
		Major Source Status	Non-Major Source Status
PM	Yes	Yes	
PM ₁₀	Yes	Yes	
SO ₂	Yes	Yes	
VOC	Yes		No
NO _x	Yes	Yes	
CO	Yes	Yes	
Individual HAP	Yes		No
Total HAPs	Yes		No
CO _{2e}	Yes	Yes	

3. MACT Standards:

Source 1000: Kiln #1 Emergency Generator 1 – MACT Subpart ZZZZ

Source 1100: Kiln #2 Emergency Generator 1 – MACT Subpart ZZZZ

Source 1200: Kiln #1 Emergency Generator 2 – MACT Subpart ZZZZ

4. Program Applicability: Are the following programs applicable to the facility?

- PSD (No)
- NESHAP (yes)
- NSPS (No)

II. Compliance Information: Compliance Status:

Is the facility currently in compliance with all applicable requirements? (yes)

Are there any applicable requirements that will become effective during the permit term? (no)

III. Other Requirements

A. Emissions Trading: The facility is not involved in an emission trading program.

B. Acid Rain Requirements: This facility is not subject to any requirements in Title IV of the Clean Air Act.

C. Prevention of Accidental Releases: Not Applicable

This facility is a lead emitting source. The allowable emissions for the facility are higher than the actual emissions from this facility. The allowable emissions of lead were modeled to see if the emissions will exceed the ambient air quality standard. The modeling shows that the ambient standards would not be exceeded.

The actual emissions for lead from this facility are variable depending on the input lead content of the furnace dust that is used as material input. Actual lead emissions more than 0.5 tons per year would require the state to put lead monitors at this site. The company provided data to prove that the actual lead emissions did not exceed 0.5 tons per year.

IV. Public Participation Procedures: Notification of the first draft of this permit was mailed to the following environmental agencies:

1. Knox County
2. EPA
3. North Carolina Division of Environmental Management
4. Virginia Department of Environmental Quality
5. Kentucky Division of Air Quality
6. Cherokee Nation

V. Other Changes:

1. Construction Permit No. 968625P is being parallel processed to change the emission limits for metal HAPs and change in compliance method.

2. Construction Permit No. 967255P is being parallel processed as new source 600 will include not just one baghouse as originally permitted but also the 4 silos and bin vents previously grouped under source 500

VI. Changes since the permit was issued on November 1, 2017:

Minor Modification #1: This minor modification incorporates the changes made to Sources 700 and 800 in construction permit 972749. For Source 700 this increases the burner capacity from 35 MMBtu/hr to 42 MMBtu/hr. The opacity limit for Source 800 was changed from ten percent (10%) to twenty percent (20%).

Minor Modification #2: This minor modification changes the compliance date for more frequent PM₁₀ monitoring from February 1, 2018, to August 1, 2018, to allow more time for the installation, startup, testing and calibration of new monitors.

Minor Modification #3: This minor modification changes the compliance date for more frequent PM₁₀ monitoring from August 1, 2018, to January 7, 2019, to allow more time for the installation, startup, testing and calibration of new monitors.

Minor Modification #4: This minor modification changes the compliance date for more frequent PM₁₀ monitoring from January 7, 2019, to April 8, 2019, to allow more time for the installation, startup, testing and calibration of new monitors.

Minor Modification #5: This minor modification incorporates the new standard conditions D11, D12, D13, and D14. The permittee is replacing two existing emergency engines (Sources 1100 and 1200) with natural gas fired engines that qualify as insignificant under new rules referenced in the new standard conditions. A third existing engine (Source 1300) also qualifies as insignificant. All three of these engines will be removed from the permit and the new standard conditions will serve as reference to the necessary federal regulations. All three of these engines are subject to MACT Subpart ~~ZZZZ~~.

Minor Modification #6: This minor modification incorporates changes associated with the start-up of the site monitors. The latitude and longitude of Site 1 in Condition E3-10 was changed to account for the location of the new monitor. The language in Condition E3-12 was also amended to include the new Ambient Air Quality Monitoring and Quality Assurance Plan for PM₁₀ and revise some of the testing language.

Minor Modification #7: This minor modification makes changes to Section D of the permit in order to reference only the federal rules applicable to this facility (rules for internal combustion engines and gasoline dispensing facility). In addition, language was added to Condition E1 to clarify the facility's option to choose whether to pay fees based on actual or allowable emissions. The names of the current Technical Contact and Billing Contact were also updated.

Administrative Amendment #1: This administrative amendment changes the permittee name from American Zinc Recycling Corp. to Befesa Zinc US Inc. The dates for the annual accounting period were also updated in Condition E1.

Significant Modification #1: This significant modification removes the PM₁₀ monitoring requirements in conditions E3-10 through E3-14. Condition B7 was removed per EPA advisement. The dates for the annual accounting period, along with the address for submitting fees/actual emissions analysis to the Nashville Central Office were updated in Condition E1. The facility contacts were updated in Condition E3-4.

VII. Public Notice and public hearing:

On January 25, 2016, a public notice was published in the newspaper. Before thirty days of public notice were over, a request for public hearing was received.

A Public Hearing was held on April 14, 2016. Several written and oral comments were received. The following insert identifies the comments reviewed and the Division's response. Due to the nature of the comments, the draft permit was changed to include a requirement to develop and implement a fugitive emissions maintenance plan, an operating and maintenance plan for the product control devices, increase the ambient air monitoring for PM10 to once every three (3) days for at least one (1) year after the issuance of the permit, and to install leak detection system on product baghouses 700 and 800.

VIII. Second Public Notice for Proposed Permit and Notification

Notification of the second draft of this permit was mailed to the following environmental agencies:

EPA
Kentucky
Knox County

Date of Public Notice: June 19, 2017

Comments: Please see Response to Comments #2

Date of Public Hearing: A hearing was not requested.

IX. Rationale for Emission Limitations:

Condition E10-12: The lead limitation was set based on the permittees application dated March 21, 2012. The Division lowered the requested limitation for both stacks (zinc product and IRM stack) due to the issue of lead monitoring.

Condition E11-13: The lead limitation was set based on the permittees application dated March 21, 2012. The Division lowered the requested limitation for both stacks (zinc product and IRM stack) due to the issue of lead monitoring.

RESPONSE TO COMMENTS

General Information

Facility Name:	American Zinc Recycling Corporation (formerly Horsehead Corporation)
Emission Source Reference No.	73-0107
Permit No.	562547
Date Application Received:	March 21, 2012
Date Application Deemed Complete:	April 23, 2012
Date of Public Notice:	January 26, 2016
Date of Public Hearing Notice:	March 11, 2016
Date of Public Hearing:	April 14, 2016

For Public Hearing

Hearing Officer:	Malcolm Butler, Division of Air Pollution Control (DAPC)
Other DAPC Representatives:	Martie Carpenter, Steven Simpson, Jarrett Rudd, Sunanda Shajikumar, and Linda Bilbrey
Other Divisions:	None
Public:	Approximately 30

Overall Comment Summary

The following is the Tennessee Department of Environment and Conservation (TDEC) Tennessee Division of Air Pollution Control (TDAPC) response to comments made during the public hearing held on April 14, 2016, regarding the draft Title V Operating Permit (562547) for Horsehead Corporation at 199 Truck Route in Rockwood, Roane County. The oral and written comments received regarding the draft permit are included in this document.

At the hearing there were eight verbal comments recorded. Of those eight citizens who made verbal comments, six submitted written comments in addition to those given verbally. There were also two written comments from individuals who did not give oral comments. The hearing officer allowed an additional week to receive written comments. There were no additional comments received.

In the "General Themes" section, below, the Division provides a summary of issues that were raised by multiple commenters and provides responses to these comments.

The response to each comment is also provided in the table below. The Division's response to an individual comment may refer back to a general theme section of this document. Specific questions are answered where appropriate.

Not all of the comments addressed the content of the draft Title V permit. However, all comments were addressed as a matter of Division policy. The Division is not obligated to respond to comments, only to consider comments in evaluating a permit issuance. However, the Division as a matter of policy makes available a comment/response summary. The summary, in turn, becomes a part of the permit record and is included with the proposed permit that goes to EPA for review.

General Themes

Title V Permit

Title V of the Clean Air Act requires major stationary sources of air pollutants, and certain other sources, to obtain and operate in compliance with a Title V major source operating permit. The Clean Air Act and Tennessee regulations require the responsible official of a Title V source to certify compliance with all applicable requirements of their Title V permit at least annually with a truth and accuracy statement.

Sources that have the potential to emit at or above the major source threshold for air pollutants are required to have a Title V permit. The major source threshold for any regulated air pollutant is 100 tons/year¹. Major source thresholds for hazardous air pollutants (HAP) are 10 tons per year for a single HAP or 25 tons per year for any combination of HAP. Horsehead is subject to the Title V permit program because their potential-to-emit emissions of PM10 (particulate matter less than or equal to 10 microns), VOC (volatile organic compounds), and nitrogen oxides are each greater than 100 tons per year.

The basic components of a Title V permit are the approved permit application, the permit record and the permit itself, which specifies all the pollution control requirements from federal or state air pollution control regulations that apply to a source.

Opposition to the Issuance of the Permit

The decision to issue or deny a permit application is not discretionary. If an applicant meets the standards set forth in Tennessee Air Pollution Regulations, the agency must issue a permit.

The Department cannot make permitting decisions based on community approval or disapproval of the company/facility or make permit decisions based on the number of individuals or groups that support or oppose a project. The Department's decision is based on the technical review of an applicant's application and the regulatory requirements in place at the time of the review. If it appears that the applicant can fulfill these requirements, a permit is issued. Sometimes, emission testing is required in the permit as part of proving that the applicant can and does meet the emission standards.

The Department issues permits that require compliance with all current applicable standards and regulations set by the EPA (Environmental Protection Agency) and TDAPC (Tennessee Division of Air Pollution Control).

Visible Emissions

Some of the commenters mentioned visible emissions at all hours of day and night that create a layer of smoke in the valley. The commenters claim that Horsehead is responsible.

The city of Rockwood is located at the base of the eastern escarpment of Walden Ridge in Roane County, Tennessee. The city sits approximately 1000 feet below the ridgetop. Rockwood is located in a portion of Tennessee Valley that makes up the larger Great Appalachian Valley.

Subsidence inversions play a large part in the local air movements around the Horsehead facility in Rockwood. Subsidence inversions can happen when air moving towards Walden Ridge is compressed against the ridge, causing the air to warm. As the warmer air travels over the ridge and over the cooler air of the city, it traps the cold air near the surface in a cold pool. Without an exit, the cold pool will condense and form moisture, trapping emissions from automobiles, industry, and homes. The combination of moisture and smog will have visible impacts in the valley, particularly at the eastern base of the ridge. Subsidence inversions can happen year round and can last for several days in valleys.

Even when the emissions from the facility comply with all allowable limitations, emissions from the facility, along with emissions from other sources in the area, can appear to be worse than they are because of the inversion scenario.

¹ Lower thresholds apply in certain designated nonattainment areas [see 40 CFR 70.2, definition of "Major Source"]. However, no such areas exist in Tennessee.

Peace and Quiet (Noise)

TDAPC does not have statutory authority to regulate noise and therefore cannot regulate noise levels under regulation or permit.

Health Impacts to Sensitive Individuals

In order to receive an air quality permit, the facility must demonstrate that they are in compliance with air quality standards set by the Environmental Protection Agency (EPA) and Tennessee Division of Air Pollution Control (TDAPC). The Clean Air Act, which was last amended in 1990, requires the EPA to set National Ambient Air Quality Standards (40 CFR part 50) for pollutants considered harmful to public health and the environment. The Clean Air Act established two types of ambient air quality standards: 1-primary standards to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly, and 2-secondary standards to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings. The EPA has set National Ambient Air Quality Standards (NAAQS) for six principal pollutants, which are called "criteria" pollutants: particulate matter, nitrogen dioxide, sulfur dioxide, ozone, carbon monoxide and lead. The NAAQS are reviewed at the federal level every 5 years and updated as necessary so that concerns regarding the health of sensitive individuals and protection of welfare are incorporated into air quality requirements.

These NAAQS are implemented via emission standards and procedural requirements in Tennessee's regulations through our rulemaking process. Horsehead has demonstrated through air dispersion computer modeling that the maximum emission concentrations are below these ambient standards. The permit requires stack testing, continuous emission monitors, monitoring of pollution control devices, recordkeeping and reporting to ensure that the facility is meeting the regulatory requirements. Horsehead is also required to monitor the air quality and operates three particulate matter monitors at strategic locations outside of their property. These monitors have not indicated an exceedance of the ambient air quality standard for particulate matter.

Malfunction Reporting

Many individuals commented on "upsets" at the facility and frequency of these upsets. The Title V draft permit requires Horsehead to report to TDAPC within 24 hours any malfunction that results in emissions in excess of permitted emission limits. The written follow-up report is required to include the following items: stack or emission point involved, time malfunction began and/or when first noticed, type of malfunction, time the air contaminant source returned to normal operation, and the company employee making entry on the log must sign, date, and indicate the time of each log entry.

Increased Reporting and Notification Requirements

By agreement with the applicant, the draft Title V permit contains increased reporting requirements beyond those are currently set forth in the existing permits. The Division considers that the reporting requirements set forth in the proposed Title V permit are adequate for regulatory purposes and the protection of public health.

The Division is a regulatory agency and has no direct emergency response capabilities. If a situation is observed that could be considered an emergency, then local emergency responders need to be contacted. Working through the Tennessee Emergency Management Agency (TEMA), the Division provides technical support to local emergency responders on an as needed basis.

Ambient Monitoring

Some citizens have requested that the state of Tennessee install additional ambient air monitors in their community. The company operates ambient air monitoring devices under the requirements and audit of the Department's Division of Air Pollution Control. Additionally, computer modeling was conducted to gauge the impact of the company's emissions on ambient air quality to augment the ambient monitoring. Based upon the ambient monitoring data and computer modeling results, additional ambient air monitoring is not warranted.

Ownership Information

The Responsible official for the Horsehead facility is Timothy Basilone. Horsehead Corporation is registered with Tennessee's Secretary of State. State records do not include the name of the owners other than to indicate that Horsehead is a corporation and may include many stockholders.

Odor Concerns

Comments expressed concern about "a typical metallic smell" that may come from the facility. There are no state or federal odor regulations. The presence of odor does not necessarily signal the presence of dangerous air pollutant. Many air pollutants have an odor threshold far below the level that would cause harm. As previously mentioned, TDAPC has evaluated the applicant's emissions through both modeling predictions and monitoring measurements and determined that emission levels from the company are at levels believed to be low enough to protect public health and welfare.

Extension of Public hearing period

Commenters requested an extension of the public hearing period so that more citizens could have a chance to comment. The public comment period was extended for one week to allow the public more time to comment on the draft Title V permit. The Division did not receive any other comments.

Facility's Accountability to Rockwood Citizens

Many commenters mentioned that they have witnessed many upset conditions at the Horsehead facility where emissions could be seen at multiple locations throughout the facility.

The Department has issued minor source construction and operating permits to this facility over the years. The draft Title V major source operating permit addresses all of the air contaminant sources at the facility in one permit. The draft Title V permit will include extensive compliance assurance measures for applicable permit requirements and require semiannual and annual reporting. The responsible official will sign the reports with a truth and accuracy statement. These records will be used to augment TDAPC inspections of the facility and do not replace an inspection by TDAPC inspectors.

Changes to the Draft Title V Permit

1. Require Horsehead to develop and implement an extensive preventative maintenance program for the prevention of fugitive emissions.
2. Horsehead will be required to do more extensive and frequent monitoring of baghouse operations on Kiln #1 and Kiln #2. This requirement is due to a violation of the 20% opacity standard for Kiln #2 baghouse on March 2, 2016. During the opacity exceedance, the pressure drop readings did not indicate that there was an issue with the baghouse. An NOV was issued on April 11, 2016, for the opacity violation.
3. Horsehead will be required to conduct ambient monitoring once every three (3) days for a period of one (1) year. If any particulate matter (PM10) measurements during the one (1) year of monitoring exceeds $150 \mu\text{g}/\text{m}^3$

24-hour average then the once every three (3) days shall continue, if not then Horsehead will go back to monitoring every six (6) days.

Comment Summary

Written

Commenter:	Gary Jones
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Comment(s): I stay in Florida five months a year. When I am there I am fine. But here, I have lung trouble. And I live close to the incinerator 318 South Chamberlain Avenue. Most trouble I have when fumes are present.

Response: The possible presence of fumes is addressed in the general themes section.

Commenter:	Kimberly Howe
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Comment(s):

1. What chemical does Horsehead emit the most?
2. In setting horsehead emissions, do you put into the equation, the over emissions?
3. None of us knew about a permit registry. How do we get on there?
4. We are (want?) to object to permit

Response:

1. Particulate matter (mostly zinc oxide dust)
2. The allowable emissions on the permit are lower than the standards allowed by Division rules. Emissions due to malfunctions are not necessarily included with the allowable emissions. Emissions that exceed the allowable levels would result in a review of the incident for possible enforcement action.
3. Permit registry is a county-by county email list with the Division consisting of names of citizens who are interested in finding about any permit issued in their county. You may call the Division at 615-532-0554 and request to be included on the permit registry.
4. The general themes section includes a response to this concern.

Commenter:	Roberta L. Dennis
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Comment(s): My lungs are weak from the air. My nails will not even grow because of metals in my body. Metals prevent calcium intake. Cannot walk in the evening; too hard to breathe. Toxic air even put out hundreds at Rockwood High School game

Response: The general themes section addresses this concern.

Commenter:	Carolyn B. Park
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Comment(s): Please explain the "upset" conditions which Horsehead mentioned in this meeting (today) and how often does this occur and is it mentioned when this occurs.

Response: The upset conditions are not normal operations. As required by TDAPC, Horsehead maintains a malfunction log that maintains records of upset conditions. This log is reviewed during periodic inspections by TDAPC inspectors.

Commenter:	Adam Trout (& Melissa)
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Comment(s): I want to fully understand the permits and regulations that are meant to monitor and control the air pollution contributors being emitted from/by Horsehead

Response: The general themes section discusses the Title V permit program and the underlying regulations.

Commenter:	John Dennis
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Comment(s): Informative. Thank you.

Response: No response required.

Commenter:	David Martin (email)
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Comment(s):

1. The number of complaints by people in the Rockwood community at the April 14, 2016 public meeting about excursions and releases of possible hazardous material need to be fully investigated before moving forward with issuing any new permits to Horsehead Corp. Although anecdotal, the similarities of what various people experienced is troubling. Especially considering Horsehead Corp admitted there were cases when releases occurred.
2. Considering the close proximity of Horsehead to the Rockwood High School and a resident area, starting immediately Horsehead Corp should be required to report all releases from malfunctions and/or operating errors to TDEC within 24 hours of the event. Within 7 days of a reportable event, Horsehead should be required to submit to TDEC what was done or what is being done to correct the problem.

Response: The general themes section addresses these comments.

Commenter:	Nick Barrett (typed comment)
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Comment(s): MY COMMENTS FOR THE RECORD: Nicholas (Nick) K. Barrett Living 2,200 feet from Horsehead ground zero!
I have lived in Rockwood TN for 14 years, from 2002 to 2007 my wife & I lived at "614 N. Kingston Ave. Rockwood TN 37854, & did not notice any issues with Horsehead other than Piles of Gray Material. When I drove over that way it was obviously not operating at the time.

In May 2007 we Purchased a Home at "420 W. Rockwood St., Rockwood TN 37854" and enjoyed a few years of "peace & quiet". We paid \$200,000 for this 6000 Sqft home on 1 1/2 acres. We proceeded to spend another \$200,000 upgrading & repairing this 100 year old Victorian home. Completing much of the work in the 2007.

Almost immediately after completing these investments in our home just one block from our business locations in downtown Rockwood (309, 319 & 329 W. Rockwood St), we noticed the construction at Horsehead out our bedroom windows, which was typical construction noise & no problem (we knew it would end). Then, in mid 2007 Horsehead started operating, and that was the end of our "peace & quiet". After seeing hazardous "pollution" pouring out of every orifice of this factory & being subjected to the endless noise 24/7, I certainly thought someone in government when advised, shown the blatant abuse of Horsehead operations, something would be done to protect the public. No, that has not been the case, in fact it appears that TDEC & its Political Handlers are the protectors of Horsehead business at all costs.

HISTORY OF MY INVOLVEMENT IN TRYING TO GET HORSEHEAD TO BE A GOOD NEIGHBOR

Starting with city government & police calls, then proceeding to TDEC, then to the EPA, then a year long EPA Criminal Investigation, I participated as a CI (confidential informant) allowing the EPA to mount cameras at my properties. After this lengthy monitory, testing & investigation the "Chief Agent in Charge - for Region 4" submitted the case to the EPA prosecutor. To his surprise he was told to back off, and told me he was borderline insubordinate in his response to this blatant shut down of his case, in view of the inferred criminal behavior of Horsehead Management through false reporting in the permitting process.

I actually was invited by Horsehead to visit & tour their facility along with City Council members 04/12/11. I actually pointed out the emission sources & issues to the members on the tour, then when we reconvened in the Horsehead on site office, their Chief Engineer was in attendance. To my surprise & absolutely no response from anyone, he stated that "we polluted the hell out of Rockwood in 2008". It was as if no one on the council heard a word, but I have no doubt the engineer in his honesty, either is no longer with the company, or at least heard an earful.

I requested & received a public hearing at City Council with Horsehead executives in attendance & showed video, pictures, maps & samples taken by EPA that I received via FOi (Freedom of Information) requests. No action was ever taken. I was notified the EPA Case was referred to TDEC in Nashville for further action – I did receive a letter from TDEC "Assistant General Council" 5/10/2011 Stating ;"Potential Fraud in Reporting were answered in the negative" & our "experts" at TDEC found that evidence of criminal activity was exculpatory - this matter is considered closed. They however will reopen the case if future criminal activity is occurring.

The EPA sent me a SYNOPSIS on 2/25/2010

- 1) 10/26/2009 - EPA Investigator met with TDEC reps, providing several Video Clips of Horsehead & referring the matter to TDEC for criminal Investigation.
- 2) 11/16/2009 - EPA Investigator met with USEPA, Air Div. Knoxville & provided them with photographic, video & live feed video feed. He officially referred this matter to the USEPA, Air Div. for civil consideration.
- 3) 2/5/2010 - United States Attorney's Office declined the case based upon EPA-CID request.
- 4) 2/25/2010 - This Criminal Case was closed.

On 9/12/2011 I received a letter from USA EPA Assistant Attorney General advising me that my FOIA Request for copies of the Video Hard Drives used in this investigation & taken from my home at 420 W. Rockwood St. "were inadvertently destroyed by computer malfunction at the EPA National Computer Forensics Lab in Jacksonville FL., so they cannot provide the copies"

Please be advised that I have video taken during this same investigation period with my own personal equipment & facilities, & that these are not destroyed.

In conclusion I have continually observed Hazardous Emissions from multiple locations & equipment, including up to the date of this Public Hearing. The Noise, pollution & long term health risks are at stake, not to mention the future "Pease & Quiet" conveyed by Law to the citizens & homeowners of this City.

I respectfully request further hearing on this matter where I can present evidence that Horsehead is & has been out of compliance with its Permit, & knowingly so - in absolute technical review & reference to the professed details generated by Horsehead management.

I also, request an extension of the "Public Hearing Period" in order to get many more citizens to be able to be informed of their right to submit "written & Oral" response to the continuing Horsehead pollution issue in Rockwood.

Sincerely:

Nichol as (Nick) K. Barrett

Betty J. Barrett

Response: The general themes section addresses these comments.

Oral

Commenter:	Kimberly Howe
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Comment(s):

My name is Kimberly Howe. I am from Rockwood. I live close to Horsehead. This is my comment. I am just going to give the side effects of one of the chemicals they emit-Cadmium. The side effects are low Iron, endocrine disruptor, cardiovascular diseases, kidney damage, early osteoporosis, muscle pain, lung diseases, bronchitis, emphysema, metallic taste, impairs lung function. That's just one chemical. They emit several chemicals. Yeah this is the side effects of Cadmium. That may not be all side effects. I have COPD low iron low calcium, obstructive apnea and I feel my life has been destroyed. I am having hard time being here right now. I have severe lung issues. I feel your company caused this. I am an honest and genuine person. I will not be lying against you. I can't work anymore. I am on disability. It has affected my life and grandkids. Not just the side effects, there are emotions with it, depression and anxiety. I have been calling TDEC for a long time. I have been downplayed. City has downplayed me. I reported numerous occasions on smoke. That's just like mushroom cloud. They don't have monitors to correlate what I am reporting.

This is one thing I did call. I begged for a continual monitor. They don't have a proper monitor set up to stop over emissions.

When I called her about my health problems. She said there is no causal. We don't have enough staff to determine about people's health which it should. Here is what she wrote to me.

Letter, A sentence one paragraph, she said: Basically we have concluded the emission limits and procedural limits imposed on Horsehead Corporation are

sufficient to protect public health. How does she know that if there has been no test, no causal no effect?

Response: The general themes section addresses these comments.

Commenter:	Roberta Dennis
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Comment(s):

My name is Roberta Dennis. And I live in 460 Wexwiller house next to the house she is referring to. I have noticed, My husband and I have noticed that we cannot even go outside. I am right next to the middle school. I have called when emissions are significant. Rockwood football game. going on. Time could not have been worse. I have called someone in DC. I have called when a game is going on. Teenagers subject to this. It doesn't help when Police officer who showed up who just happens to work part time for Horsehead. That is inappropriate. He is telling you someone burning something somewhere. I don't believe that. It was obviously Horsehead. You cannot miss the smell. I have problems with my lungs. anemia. Why should I have anemia? It is affecting young people. It is political. May or may not be in the ownership position. There are people protecting people who are contaminating young people and Don't give a crap. My husband and I cannot go out to walk. It's guaranteed that 9.30 to 11.00 at night they are dumping something over there. Soot, puff of smoke. We have to jump back inside the house. We try to out race the smoke. We do. It's almost all the way to the gateway. If it is going that way, we have to go the other way. It's a shame but we have to gauge our walks accordingly. I think it's ridiculous. I would like to know the EPA or anybody who is able to who is the new owner? We want to have a letter from you. I want the names. I want to know if there is someone political as I suspect. This has been going on for 45 years. I have been here since 1970's, my family has.

Response: The general themes section addresses these comments.

Commenter:	Carolyn Hart
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Comment(s):

My name is Carolyn Hart. I live at 587 Fall Creek Road, Rockwood, TN 37584. That is in Ozone community up in the mountain. My family owns a small commercial building here in Rockwood for 15 years. I have 3 young children that are teenagers now. I just started work back here. Last august I started working on the building to get it ready open again. I became very concerned to see when I drive off the mountain a veil of smoke that seems to swirls down and branches out and goes towards Harriman. It doesn't make it to Harriman. Then it just drops and hovers down where our business is. Have fairly clean air up there. When you look off from the interstate you see the same kind of thing. You see clean air then you can see a layer that hovers over the city where our business is in Chamberlain Avenue area. I came here to be a witness, to the folks who live here and have no other alternative places to live, to say there is a problem. I have written a comment from tonight. Please explain the upset conditions which Horsehead mentioned in this meeting tonight. How often does this occur? And is it monitored during that occurrence? I would like to think that what I have been seeing has been an isolated upset condition. I don't know what those are. I don't know why we would we allow that kind of thing to happen as frequently as I see it happen. That is my comment.

Response: The general themes section addresses these comments.

Commenter:	Adam Trout
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Comment(s):

My name is Adam Trout and I am not here to accuse you of anything. I have only been in Rockwood for 5 years. I am a logical person. I want to point out, that we live in a world where information is becoming more readily accessible. There is a very good chance in 1950's In 60s and 70's we did not know what is going to happen with the products that are being emitted by Horsehead. We also live in a world where we are becoming more knowledgeable about things. We are also living in times when we hold people more readily accountable.

Our soldiers have to pass PT test every year. Our police officers have to be accountable every year. Our teachers are evaluated several times a year. When things aren't going as they should state receives the blame. I am not saying you are doing anything wrong.

The permit we were just given says that they were stack test that were conducted, dates are there as 2012, 2013. If you have capability to do stack tests Horsehead facility why cannot they be permanently monitored on a daily basis? If we want to make sure you are not damaging health of Rockwood citizens, be willing represent that on daily basis, to say that you are doing everything every single day that the air we are breathing is safe.

Your employees go through annual test for lead level in the blood etc. has not gone up. No one is monitoring Rockwood citizens. You have the capabilities to test more close to home what is coming out of your facilities. I believe it should be done that way. So that we have more peace of mind. We don't have the opportunity to come and tell you if something is wrong.

He has a video. You say leaks happen during power failures. Well I have a driver's license. If I have a car accident, my insurance goes up. If I have 15 car accidents, they take away my license.

At some time community would like to know, that you are held accountable to the highest standards possible and not passing some general guidelines. You have to make sure that the air we are breathing every morning and every night is as healthy as possible for us.

As a corporation that employs citizens in this community, it is in your interest. I see no losers if that were to be the case. I would like to see more monitoring put on the facilities.. When there is an accident how bad it hurts the people living here. If you were monitoring the stacks I don't have to worry about if the wind blows to Rockwood high school, or Harriman or Clymersville. We will know what is coming out of stacks.

If I know the worst I was exposed to, I can feel better that it was able to spread out and diffuse into the atmosphere deal with it. If I know what is coming out of stack, I don't have to worry about what the weather did.

Response: The general themes section addresses these comments.

Commenter:	Melissa Trout
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Comment(s):

Melissa Trout. My comment is that you guys stated earlier that sorry. When we are talking about everything. You were talking about not admitting stuff that there is difference between day and night. I run every morning. But many days consecutively every morning before daylight. Strong chemical smell. It made me

harder to run I cannot prove it came from Horsehead for sure. We turned off the AC just to see if we can do this all summer. One night it felt like chemical fire. Sometime people burn brush and they burn things they should not like plastic but this is different, very consistent. I would like more monitoring, more accountability. And would like you to be above collar. May not be economical but that's what I would like to see.

Response: The general themes section addresses these comments.

Commenter:	Nicholas Barrett
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Comment(s): I am Nicholas Barrett. (Reading from the written comment)

Response: The general themes section addresses these comments.

Commenter:	John Dennis
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Comment(s): John Dennis 416 West Willow Street. My wife Roberta and I live right next to the middle school, right next to the field. Try to enjoy our evening walks. Walk during the day and night. I have to work during the day. They get away with it during day time. Had to put in an air purifier .unbearable. House built in 1897. Hasn't been modernized. Whatever is outside comes in. I have had Respiratory problems. That I didn't have all my life. I will not blame it on Horsehead. We have gone out for walks, all of sudden smoke comes through the air. Sometimes you see sometimes you don't. Feel smoke asphyxiation. Takes your breath away. So bad totally overwhelming we called. You have to jump through hoops to get someone to listen or help. I don't know the process there. I don't know if Plant needs to relocate or update. I don't much . Something has to be done. So that we can go out and take our walks. We have been here for 30-35 years. We need to know when accidents happen, we need to know. Some kind of alarm. So that we can leave town or something.

Response: The general themes section addresses these comments.

Commenter:	Theresa Isham
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Comment(s): ...cannot open windows and doors. Cannot sit in the porch. Cannot breathe in general. I am worried for my child who was born in this hospital who has lived here all her life in this valley. I don't have money to move. I don't have any extended family to help. I don't have an option. We all need some answers. I may die and that may not be any great loss to this community but my daughter. I won't go down that without a fight.

Response: The general themes section addresses these comments.

Commenter:	Roberta Dennis (second round)
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Comment(s): One of the problems that I have noticed when this business gets sold, The owners related to elitist political class. Bottom line is who the current owners, new owners. Jim Henry used to be involved in this. That is real hindrance in having faith at state level. It is difficult to do anything if the owner is Lieutenant Governor of Tennessee. That would be conflict of interest. That's just one example. Would like to know the names of people, limited partnerships or who are buying it. I would like a copy of that mailed to my home.

Response: The general themes section addresses these comments.

Commenter:	Nick Barrett (second round)
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Comment(s):

I am a lifetime engineer and I have observed this factory in operation. I hate to say this but it's a botched job. I think the engineer knows it. The only way you can fix it is tear it down and build up again from scratch. Like some European facilities totally enclosed if you go online and see it, the Waelz kiln process. Right now you are trying to get this in control since 2007.

I don't think anything is going to come of this hearing. As I told there was a criminal investigation. The reason it was a criminal investigation is when you fill out the permit application, and say that you are in compliance There is a term, The executives, head of the company cannot claim lack of knowledge.

I have videos of them taking samples everywhere.

Lot of man hours and money spent. They presented it to EPA. People who are qualified to do it. And I have all their names. Somebody politically connected stopped it. If you extend this public comment period, If we have time to tell everyone there are 100s of people who will come. You will hear the same thing you heard it here. This has been going on since 2007.

City council does not do anything because of money. The utilities, property tax money, state money. Somebody's connected and wants to stop it. So we have to get rid of the city council and Mayor. They are all nice people but if they are not competent we have to get rid of them. I am going to run for city council. After that Mayor if I have to. My wife doesn't want me to but I will if we have to stay next to Horsehead.

Response:

The general themes section addresses these comments.

RESPONSE TO COMMENTS #2

General Information

Facility Name:	American Zinc Recycling Corp. (formerly Horsehead Corporation)
Emission Source Reference No.	73-0107
Permit No.	562547
Date Application Received:	March 21, 2012
Date Application Deemed Complete:	April 23, 2012
Date of Second Public Notice:	June 19, 2017
Date of Public Hearing Notice:	Not requested
Date of Public Hearing:	Not requested

For Public Hearing

Hearing Officer:	NA
Other DAPC Representatives:	NA
Other Divisions:	NA
Public:	NA

Comment Summary

Written

Commenter:	J. Andrew Goddard
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Comment(s): 1 – The commenter requested to change the name of the permittee in the permit.

Response: The name was changed.

Comment(s): 2 – The commenter requested that the Division issue the construction permit to change the burner capacity of Kiln 1 prior to the issuance of the Title V permit.

Response: Construction permit 972749 was issued on July 27, 2017. This permit changed the burner capacity of Kiln 1. The Division will issue a minor modification to this pending Title V permit to include the correct burner capacity.

Comment(s):

3 – The commenter requested that the Division issue the construction permit to change the opacity limitation of S800 and S802 (Kiln 2) from 10% to 20% to be consistent with other sources at the facility.

Response:

Construction permit 972749 was issued on July 27, 2017. This permit changed the opacity limitation for S800 and S802 from 10% to 20%. The Division will issue a minor modification to this pending Title V permit to include the change in the opacity limitation.

Comment(s):

4 – The commenter requested that the Division change condition E3-2 to reflect the new opacity limitation for S800 and S802.

Response:

The Division will make the requested change with a minor modification to the pending Title V permit when issued.

Comment(s):

5 – The commenter requested that averaging times be added to conditions E10-7, E11-5, and E11-9.

Response:

Condition E10-7 has a grain loading standard for particulate matter. This type of standard does not have an averaging time. Demonstration of this limitation would be determined during a stack test with three (3) one-hour test runs.

Compliance demonstration with the particulate matter limitation in Condition E11-7 would be determined using EPA Method 5 which would be the average of three (1) one-hour test runs.

The daily average language was added to Condition E11-9.

Comment(s):

6 – The commenter requested that the Division conduct the ambient monitoring of PM10 for the facility. The comment described various scenarios for the ambient monitoring of PM10.

Response:

The Division in a separate action will address whether or not the Division will conduct the ambient monitoring of PM10.

The Division will change the permit language so that the current Ambient Air Quality Monitoring and Quality Assurance Plan for PM10 dated June 14, 2010, is effective until requested by the Division to amend the plan.

Comment(s):

7 – The commenter requested to change the language in Condition E3-12 so that it is clear when the frequency of monitoring is changed from every three (3) days to every (6) days and that monitoring data from unusual events be excluded.

Response:

Condition E3-12 was changed based on the commenter's request.

From: [Air.Pollution Control](#)
To: [APC Permitting](#)
Subject: FW: ESRN 73-0107 Permit No. 562547 air monitors
Date: Thursday, September 8, 2022 2:35:55 PM
Attachments: [image001.png](#)
[ESRN 73-0107 permit no. 562547 sig mod air monitors.pdf](#)

From: Jim Taylor <jim.taylor@befesa.com>
Sent: Thursday, September 8, 2022 11:40 AM
To: Air.Pollution Control <Air.Pollution.Control@tn.gov>
Cc: Chelsea Meadows <Chelsea.Meadows@tn.gov>; Michelle Oakes <Michelle.Oakes@tn.gov>; Ben Hartsfield <Ben.Hartsfield@tn.gov>; Jill Pratt <Jill.Pratt@tn.gov>; Don Norton <don.norton@befesa.com>
Subject: [EXTERNAL] ESRN 73-0107 Permit No. 562547 air monitors

***** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. *****

Good Afternoon,

For your review and consideration attached is a significant modification request regarding ESRN 73-0107 permit no. 562547 air monitors. Please let us know if there are any questions.

Thank you for your time.

Best Regards,

Jim Taylor

Manager, Environmental, Health & Safety

Befesa Zinc US Inc

199 Truck Route

P.O. Box 5

Rockwood. TN, 37854

P: 865-354-0955 ext.: 1134

F: 865-354-2167

C: 865-207-9958

jim.taylor@befesa.com

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Don Norton
Director of Operations-West

Befesa Zinc US Inc.
199 Truck Route
Rockwood, TN 37854

September 2, 2022

Michelle W. Owenby
Technical Secretary
Division of Air Pollution Control
Tennessee Department of Environment & Conservation
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243

Subject: Befesa Zinc US Inc.
ESRN 73-0107
Significant Modification Request to Remove PM₁₀ Monitoring Requirements

Dear Ms. Owenby:

Based on discussions with, and with input from, Division of Air pollution Control personnel, Befesa Zinc US Inc. (Befesa) submits a significant modification request to remove the PM₁₀ monitoring requirements as identified in Conditions E3-10 through E3-14 of Permit 562547. Befesa submitted a renewal application dated April 29, 2022 and requests this significant modification be included in the renewed permit.

Ambient air monitoring of particulate matter less than ten microns in diameter (i.e., PM₁₀) began in the early 1990s at two locations. Recorded monitoring data has been used to determine compliance with the National Ambient Air Quality Standards (NAAQS) for PM₁₀. The primary and secondary 24-hour NAAQS for PM₁₀ is 150 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), 24-hour average concentration. The following two locations were established for the PM₁₀ monitors.

- **Site #1 – Rockwood High School (AIRS Site # 47-145-0104, SN 1636):** PM₁₀ monitoring Site #1 is situated on the roof of Rockwood High School, approximately 620 meters northeast of the Befesa facility at the following Universal Transverse Mercator (UTM) coordinate locations:
 - Easting – 708.576 km;
 - Northing – 3972.133 km.
- **Site #2 – Clymersville Road (AIRS Site # 47-145-0104, SN 1634/SN 1635):** PM₁₀ monitoring Site #2 is approximately 338 meters southwest of the Befesa facility in a small clearing. Site #2 is a collocated monitoring site that includes two samplers. The PM₁₀ sampler with Serial Number (SN) 1634 is designated as the primary sampler; PM₁₀ sampler SN 1635 is the secondary sampler. The monitors are spaced 2.7 meters from each other in accordance with

40 CFR Part 58 Appendix E, Table E-4 and 40 CFR Part 58, Appendix A, Section 3.3.1.2. The monitors are located on the south side of Clymersville Road, which runs northeast-southwest at the following UTM coordinates:

- Easting – 707.811 km;
- Northing – 3971.560 km.

In 2010, an Ambient Air Quality Monitoring and Quality Assurance Plan for PM₁₀ was developed to present the specifications, operational guidelines, and quality assurance necessary to conduct an ambient air quality monitoring program. It was revised in April 2019. Monitoring data has been collected, analyzed, and reported each month in accordance with this plan and the requirements of Permit 562547.

Monitoring data from January 2019 through June 2022 is attached to this significant modification request. Data from both locations was reviewed to select the highest concentration for each month between January 2019 and June 2022. The highest maximum reading during that period was 49.7 µg/m³ on May 22, 2021. The average concentration during this period is 23.3 µg/m³.

Befesa has demonstrated that the permitted operations will not exceed the PM₁₀ NAAQS standard of 150 µg/m³ through data provided to TDEC in accordance with the permit and monitoring plan. In fact, the highest concentration measured since January 2019 is 49.7 µg/m³ which is 33% of the NAAQS standard.

Continuing to monitor PM₁₀ concentration at these sites does not contribute to the overall protection of the environment, therefore, Befesa formally requests through this significant modification request that TDEC remove the PM₁₀ monitoring requirements in Permit 562547.

I hereby certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Please provide written notification of receipt of a complete, timely application so that Befesa may continue to operate under the current permit while a new operating permit is being drafted. If you have questions or comments, please contact Jim Taylor, Manager, Environmental, Health & Safety at 865-354-0955 ext 1134.

Sincerely,



Don Norton

Director of Operations – West

Summary of Highest PM₁₀ Concentration
from January 2019 – June 2022

BEFESA

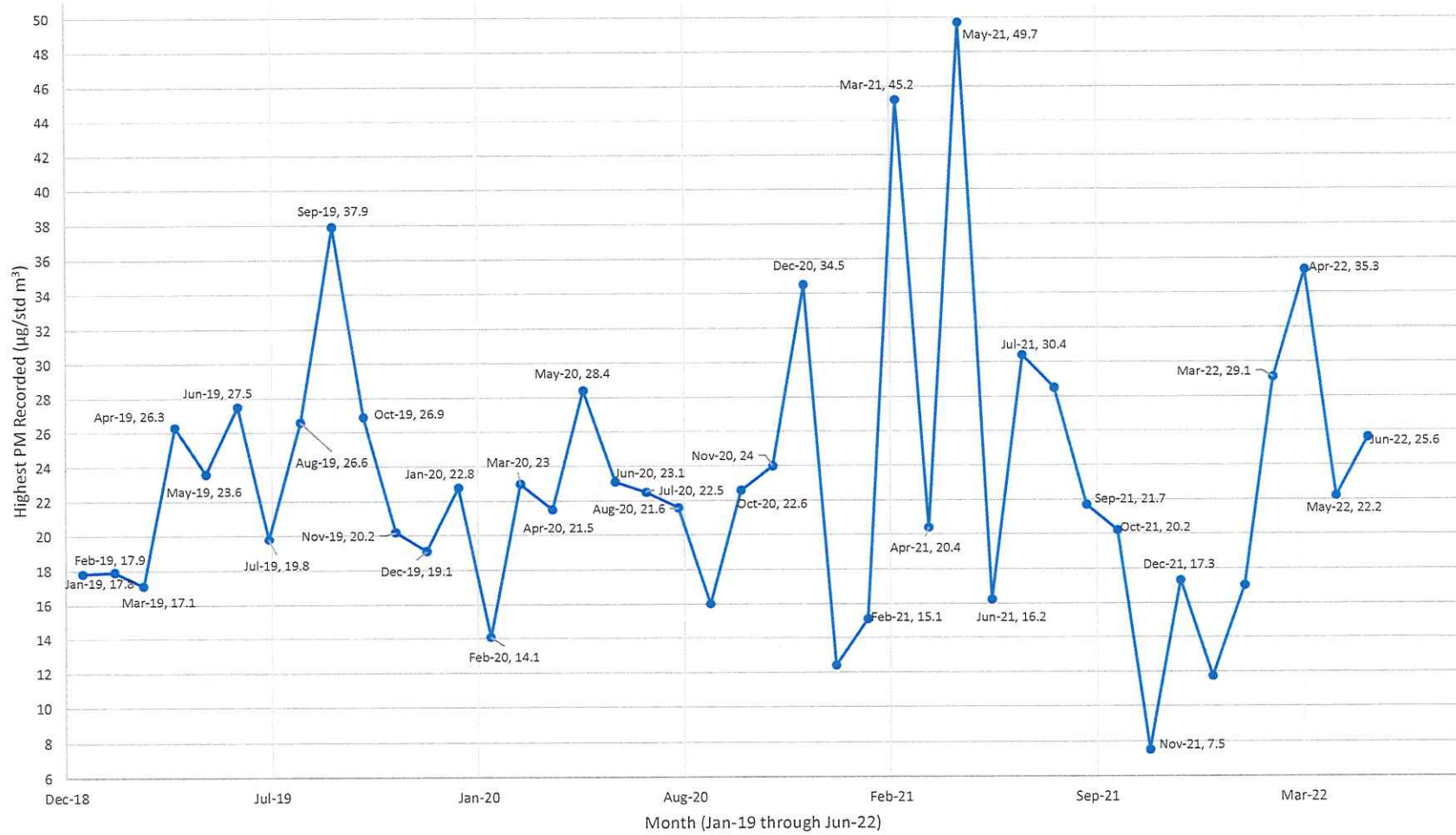
This table summarizes the highest PM₁₀ concentration recorded among the three samplers at two locations from January 2019 - June 2022.

Month	Highest PM Recorded	Units
Jan-19	17.8	µg/std m ³
Feb-19	17.9	µg/std m ³
Mar-19	17.1	µg/std m ³
Apr-19	26.3	µg/std m ³
May-19	23.6	µg/std m ³
Jun-19	27.5	µg/std m ³
Jul-19	19.8	µg/std m ³
Aug-19	26.6	µg/std m ³
Sep-19	37.9	µg/std m ³
Oct-19	26.9	µg/std m ³
Nov-19	20.2	µg/std m ³
Dec-19	19.1	µg/std m ³
Jan-20	22.8	µg/std m ³
Feb-20	14.1	µg/std m ³
Mar-20	23	µg/std m ³
Apr-20	21.5	µg/std m ³
May-20	28.4	µg/std m ³
Jun-20	23.1	µg/std m ³
Jul-20	22.5	µg/std m ³
Aug-20	21.6	µg/std m ³
Sep-20	16	µg/std m ³
Oct-20	22.6	µg/std m ³
Nov-20	24	µg/std m ³
Dec-20	34.5	µg/std m ³
Jan-21	12.4	µg/std m ³
Feb-21	15.1	µg/std m ³
Mar-21	45.2	µg/std m ³
Apr-21	20.4	µg/std m ³
May-21	49.7	µg/std m ³
Jun-21	16.2	µg/std m ³
Jul-21	30.4	µg/std m ³
Aug-21	28.5	µg/std m ³
Sep-21	21.7	µg/std m ³
Oct-21	20.2	µg/std m ³
Nov-21	7.5	µg/std m ³
Dec-21	17.3	µg/std m ³
Jan-22	11.7	µg/std m ³
Feb-22	17	µg/std m ³
Mar-22	29.1	µg/std m ³
Apr-22	35.3	µg/std m ³
May-22	22.2	µg/std m ³
Jun-22	25.6	µg/std m ³

Minimum	7.5
Maximum	49.7
Average	23.3



Highest Monthly PM₁₀ Recorded



Significant Modification Application

State of Tennessee
 Department of Environment and Conservation
 Division of Air Pollution Control
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 15th Floor
 Nashville, TN 37243
 Telephone: (615) 532-0554



APC 1

TITLE V PERMIT APPLICATION FACILITY IDENTIFICATION

SITE INFORMATION			
1. Organization's legal name Befesa Zinc US Inc.		For APC Use Only	APC company point no.
2. Site name (if different from legal name)			APC Log/Permit no.
3. Site address (St./Rd./Hwy.) 199 Truck Route		NAICS or SIC Code 3341	
City or distance to nearest town Rockwood		Zip code 37854	County name Roane
4. Site location (in Lat./Long)	Latitude 35.8711	Longitude -84.6953	
CONTACT INFORMATION (RESPONSIBLE OFFICIAL)			
5. Responsible official contact Don Norton		Phone number with area code 865-354-0955	
6. Mailing address (St./Rd./Hwy.) P.O. Box 5		Fax number with area code	
City Rockwood	State TN	Zip code 37854	Email address don.norton@befesa.com
CONTACT INFORMATION (TECHNICAL)			
7. Principal technical contact Eric Hunsberger		Phone number with area code 724-773-9021	
8. Mailing address (St./Rd./Hwy.) 3000 GSK Drive, Suite 201		Fax number with area code	
City Moon Township	State PA	Zip code 15108	Email address eric.hunsberger@befesa.com
CONTACT INFORMATION (BILLING)			
11. Billing contact Don Norton		Phone number with area code 865-354-0955	
12. Mailing address (St./Rd./Hwy.) P.O. Box 5		Fax number with area code	
City Rockwood	State TN	Zip code 37854	Email address don.norton@befesa.com
TYPE OF PERMIT REQUESTED			
13. Permit requested for:			
Initial application to operate :	<input type="checkbox"/>	Minor permit modification :	<input type="checkbox"/>
Permit renewal to operate :	<input type="checkbox"/>	Significant modification :	<input checked="" type="checkbox"/>
Administrative permit amendment :	<input type="checkbox"/>	Construction permit :	<input type="checkbox"/>

(OVER)

HAZARDOUS AIR POLLUTANTS, DESIGNATIONS, AND OTHER PERMITS ASSOCIATED WITH FACILITY

14. Is this facility subject to the provisions governing prevention of accidental releases of hazardous air contaminants contained in Chapter 1200-03-32 of the Tennessee Air Pollution Control regulations? Yes No

If the answer is Yes, are you in compliance with the provisions of Chapter 1200-03-32 of the Tennessee Air Pollution Control regulations?

Yes No

15. If facility is located in an area designated as "Non-Attainment" or "Additional Control", indicate the pollutant(s) for the designation.

N/A

16. List all valid Air Pollution permits issued to the sources contained in this application [identify all permits with most recent permit numbers and emission source reference numbers listed on the permit(s)].

Title V Operating Permit: 562547
ESRN: 73-0107

17. Page number :

Revision number:

Date of revision:



**TITLE V PERMIT APPLICATION
 INDEX OF AIR POLLUTION PERMIT APPLICATION FORMS**


Section 1: Identification and Diagrams		
This application contains the following forms:	APC Form 1, Facility Identification	1
	APC Form 2, Operations and Flow Diagrams	

Section 2: Emission Source Description Forms		
		Total number of this form
This application contains the following forms (one form for each incinerator, printing operation, fuel burning installation, etc.):	APC Form 3, Stack Identification	
	APC Form 4, Fuel Burning Non-Process Equipment	
	APC Form 5, Stationary Gas Turbines or Internal Combustion Engines	
	APC Form 6, Storage Tanks	
	APC Form 7, Incinerators	
	APC Form 8, Printing Operations	
	APC Form 9, Painting and Coating Operations	
	APC Form 10, Miscellaneous Processes	
	APC Form 33, Stage I and Stage II Vapor Recovery Equipment	
APC Form 34, Open Burning		

Section 3: Air Pollution Control System Forms		
		Total number of this form
This application contains the following forms (one form for each control system in use at the facility):	APC Form 11, Control Equipment - Miscellaneous	
	APC Form 13, Adsorbers	
	APC Form 14, Catalytic or Thermal Oxidation Equipment	
	APC Form 15, Cyclones/Settling Chambers	
	APC Form 17, Wet Collection Systems	
	APC Form 18, Baghouse/Fabric Filters	

(OVER)

Section 4: Compliance Demonstration Forms		
		Total number of this form
This application contains the following forms (one form for each incinerator, printing operation, fuel burning installation, etc.):	APC Form 19, Compliance Certification - Monitoring and Reporting - Description of Methods for Determining Compliance	
	APC Form 20, Continuous Emissions Monitoring	
	APC Form 21, Portable Monitors	
	APC Form 22, Control System Parameters or Operating Parameters of a Process	
	APC Form 23, Monitoring Maintenance Procedures	
	APC Form 24, Stack Testing	
	APC Form 25, Fuel Sampling and Analysis	
	APC Form 26, Record Keeping	
	APC Form 27, Other Methods	
	APC Form 28, Emissions from Process Emissions Sources / Fuel Burning Installations / Incinerators	
	APC Form 29, Emissions Summary for the Facility or for the Source Contained in This Application	
	APC Form 30, Current Emissions Requirements and Status	
	APC Form 31, Compliance Plan and Compliance Certification	
APC Form 32, Air Monitoring Network		

Section 5: Statement of Completeness and Certification of Compliance	
<p>I have reviewed this application in its entirety and to the best of my knowledge, and based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete. I have provided all the information that is necessary for compliance purposes and this application consists of <u>4</u> pages and they are numbered from page <u>1</u> to <u>4</u>. The status of this facility's compliance with all applicable air pollution control requirements, including the enhanced monitoring and compliance certification requirements of the Federal Clean Air Act, is reported in this application along with the methods to be used for compliance demonstration.</p>	
Name and Title of Responsible Official	Telephone Number with Area Code
Don Norton, Director of Operations - West	(865) 354-0955
Signature of Responsible Official	Date of Application
	9/2/22
(For definition of responsible official, see instructions for APC Form 1)	