DEPARTMENT OF ENVIRONMENT AND CONSERVATION
TENNESSEE DIVISION OF AIR POLLUTION CONTROL
ANNUAL INSPECTION

Reference No.: 41-0011
State Class: CM
Pollutant(s): VOCs

Environmental Specialist: JWK
Route To: CMW

Date Inspected: June 15, 2012

Company: TRICOR
Location address: Turney Center Industrial Prison
1499 R. W. Moore Memorial Highway
City/State/Zip: Only, TN 37140-4050

Company Contact/Title: Don Goolsby / General Mgr. Engineered Services
1501 County Hospital Road
Nashville, TN 37228

Phone: (615) 253-8811 ext. 1016 – office (615) 483-2584 - cell
Fax: (615) 253-8820
Email: Don.Goolsby@tn.gov

Does Company impact an additional control area? YES/ NO : NO
If Yes, pollutant type:

Does Company have: **NSPS (Part 60)?** EE **PSD?** No
NESHAPS (Part 61)? No **MACT (Part 63)?** No
If YES, give subpart for NSPS, NESHAPS, MACT
Sources, If YES to any, indicate point number(s): 07

Date of the last annual inspection: June 23, 2011
Time period covered by this inspection, from: January 2011 **to** December 2011
Is inspection partial or comprehensive? Comprehensive

Total time required for this inspection (hours): ____ hrs.
Was company in compliance during entire inspection time period? Yes
If NO, explain in final paragraph.

If CM source,
Date report received in EFO: March 30, 2012
Date report review complete/acknowledged by EFO: April 02, 2012
Did report have deviations from permit conditions (Y/N)? No

EXECUTIVE SUMMARY:

Tennessee Rehabilitative Initiative in Correction (TRICOR) operates several manufacturing industries within the confines of the Tennessee Department of Corrections (TDOC) Turney Center Prison located in Only, Tennessee. They are as follows: Point 03 – Woodworking Operation; Point 04 – Wood Furniture Coating Operation; Point 07 – Metal Furniture Coating Operation; and Point 09 – Sign Plant Operation.

This facility currently operates under Conditional Major Permit #454137P. This operating permit was issued on October 18, 2004 and is set to expire on June 01, 2014. Permit #454137P will be used to determine compliance throughout this report.

The two previous inspections conducted on August 30, 2010 and June 23, 2011 were both comprehensive and covered the entire source. In both cases, the facility was IN compliance with all permit conditions.

General Permit Conditions:

Condition 1 names Mr. John M. Brown as the person responsible to represent and bind the facility in environmental permitting affairs. As of April 02, 2012, the responsible official for this facility is now Mr. Don Goolsby. This notification was sent to Barry Stephens on April 02, 2012.

Condition 2 states that the facility has opted-out of being issued a major source operating permit. Condition 3 states that the facility has been placed on notice of the limitations required to maintain Conditional Major status. Compliance is not addressed.

Any non-compliance issue must be reported, in writing, to the Technical Secretary within three (3) working days of such discovery as required by Condition 4. The Columbia Environmental Field Office (EFO) has not received any notice of non-compliance during this inspection period.

Condition 5 limits the emission of volatile organic compounds (VOCs) to less than 95.0 tons during all intervals of twelve consecutive months. According to data received with the Annual Conditional Major (CM) Report, the facility did not exceed this limit. The highest emissions of VOCs occurred during the twelve consecutive month period ending January 2011 with 1.72 tons being emitted. The facility is in compliance.

Condition 6 limits the emission of any single hazardous air pollutant (HAP) to less than 9.2 tons during all intervals of twelve consecutive months. Emissions of any combination of HAPs are not to exceed 22.5 tons during any interval of twelve consecutive months. The highest emissions of any single HAP occurred during the month of December 2011 with 3.18 tons of xylene being emitted. The total emission of HAPs during this inspection period was 4.52 tons. The facility is in compliance with this condition.

Purchase orders and invoices for all VOC and HAP containing materials as well as Material Safety Data Sheets (MSDS) must be maintained and kept available for inspection as required by Condition 7. These records were observed during the on-site inspection and are being maintained in accordance with this condition.

Condition 8 limits visible emissions from any stack, vent, or opening to the atmosphere to less than twenty percent (20%) opacity as determined by EPA Method 9. No official VEE was performed during the on-site inspection as no visible emissions were observed. The facility is in compliance.

Condition 9 lists the test methods and procedures to be used should proof of compliance be required. Condition 10 states that excess emissions are to be addressed as specified in Chapter 1200-3-20 of the Tennessee Air Pollution Control Regulations (TAPCR). These conditions are informational and compliance is not addressed.

A report stating the compliance status of this facility is to be submitted to the Columbia EFO by March 31 of every year as required by Condition 11. The Annual CM Report was received by the Columbia EFO on March 30, 2012. The facility is in compliance.

Condition 12 lists the method used to determine and track the as-supplied VOC content of all VOC-containing materials used at this facility. This permit (454137P) supersedes any previous permits for this facility – Condition 13. The permittee must apply for renewal of this permit no less than sixty (60) days prior to the permit's expiration date of June 01, 2014 as required by Condition 14. These are informational conditions and compliance is not addressed.

Condition 15 requires that the permittee maintain records of the emissions of VOCs and HAPs. This log must be maintained at the source location and kept available for inspection. The required logs are maintained at this facility in accordance with this condition.

41-0011-03: Woodworking Operation: Furniture Manufacturing with Baghouse Controls

Condition 16 limits the maximum process weight rate to less than 800 pounds per hour (lbs./hr.). Particulate matter (PM) is limited by Condition 17 to less than 4.63 lbs./hr. This source is not to operate unless the baghouse is in place and operating properly. The woodworking facility was not in operation during the on-site inspection.

Condition 18 requires that routine maintenance be performed on the air pollution control devices. Maintenance records were reviewed during the on-site inspection and are being maintained in accordance with this condition.

Upon the malfunction or failure of any of the control devices, the process served shall be regulated by Chapter 1200-3-20 of the TAPCR – Condition 19. The Division has not received notification of any malfunctions during this inspection period.

41-0011-04: Spray Coating Operations: Five Spray Booths, Gas Drying Oven, Coating Wood Furniture; Exhaust Filter Control

Condition 20 limits PM to less than 0.925 lbs/hr. This limit is ensured by the source operating only with the exhaust filters in place and working properly. Visible emissions from the stack(s) are not to exceed ten percent (10%) opacity – Condition 21. This source was not in operation during the on-site inspection. The facility is in compliance with these conditions.

Routine maintenance must be performed and recorded as required by Condition 22. Maintenance is performed and recorded as required by this condition.

Condition 23 states that upon malfunction or failure of the associated control devices, the process served is to be regulated by Chapter 1200-3-20 of the TAPCR.

41-0011-07: Surface Coating of Metal Furniture (NSPS): Two Electrostatic Spray Booths; Exhaust Filter Control, Natural Gas Drying Ovens; Coating of Miscellaneous Metal Parts. Natural Gas Fired Three Stage Washing System; Powder Coating System

Condition 24 limits the emission of VOCs to less than 40.0 tons during all intervals of twelve consecutive months. According to the data received in the Annual CM Report, the entire facility emitted a total of 0.47 tons of VOCs during this inspection period.

Condition 25 requires the permittee to furnish a written report of the results of the performance test required by 40 CFR 60, Subpart EE, Standards of Performance for Surface Coating of Metal Furniture. This facility no longer uses VOC-containing coatings in this process; therefore there is no recording requirement.

The permittee is not to exceed an emission rate of 7.51 pounds of VOC per gallon from the metal furniture coating operation – Condition 26. This facility no longer uses liquid spray paint to coat metal furniture, only powder-coats are used. The facility is in compliance.

Condition 27 limits particulate matter emitted from this source to less than 1.08 lbs/hr. Compliance is assured by this source only operating with the exhaust filters in place and working properly.

Visible emissions from the stack(s) are not to exceed ten percent (10%) opacity as determined by EPA Method 9 – Condition 28. No official VEE was performed during the on-site inspection as no visible emissions were observed.

Routine maintenance must be performed and recorded on the air pollution control devices as required by Condition 29. Maintenance records are being kept in accordance with this condition.

Upon the malfunction or failure of any of the control devices, the processes served shall be regulated by Chapter 1200-3-20 of the TAPCR – Condition 30.

41-0011-09: Sign Plant and Dip Coating Operation: One Spray Booth with Exhaust Filter Control, One Cleaning Operation, One Coating Dip Tank with Dry Off Area, and Screen Printing Equipment

Condition 31 limits particulate matter emitted from this source to less than 3.96 lbs/hr. Compliance with this condition is assured by the use of exhaust filters being in place and working properly during operation.

Condition 32 requires that routine maintenance be performed and recorded on the air pollution control devices. The required maintenance and records are being kept in accordance with this condition.

There are currently no complaints, or any pending enforcement actions registered against this facility. The Mercury Disposal Fact Sheet has been given to this facility.

It is the opinion of this inspector that TRICOR at Turney Center is **In Compliance** in that no compliance problems were found under the purview of this inspector.

John W. Knoll
Inspector's Name

VEE Certification Number: 2403
Certification Expiration Date: September 2012

I verify that the format and content of this report conforms to established TN Division of Air Pollution Control annual inspection standard operational procedures guidance and that the compliance determination made in this report is correct.

Supervisor/Manager

JULY 23, 2012
Date