

We have the following comments on the Holston Army Ammunition Plant (HSAAP) Area A Title V renewal located in Kingsport, Tennessee, permit number 568191. We provide our comments to help clarify the permit terms and ensure that adequate information is provided such that the permit decisions are transparent and readily accessible to the public, and the permit record provides adequate support for the decisions.

1. Sources at this facility include organic acid tanks and two natural-gas fired boilers. The permit does not include references or attachments to requirements from the New Source Performance Standards (NSPS), unlike the proposed Title V permit for the HAASP Area B Operations, which include similar units. EPA was not able to determine NSPS applicability from the source descriptions in the permit or Statement of Basis and recommends that the Statement of Basis clarify NSPS applicability. The permit should be updated with any applicable federal regulations or the source descriptions should include any relevant information that was used to determine whether the NSPS for the subject source categories are applicable. NSPS that may be applicable, include:
  - a. 40 CFR 60 Subpart Kb—Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, for sources 82-0018-34, 83-0018-35, and 82-0018-37.
  - b. 40 CFR Subpart Db—Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, for source 82-0018-54.
2. Condition E4-1 contains place holder language for 40 CFR 63 Subpart DDDDD. This regulation was finalized on September 14, 2016. Condition E4-1 should be updated to contain all relevant and current regulatory requirements.
3. Units subject to 40 CFR 63 Subpart DDDDD must meet the emission limits outlined in 40 CFR §63.7500 and Table 2 of the regulation for hydrogen chloride, mercury, and filterable particulate matter. The particulate matter emission limit and compliance method in Condition E4-2 should incorporate the appropriate regulatory standards from 40 CFR Subpart DDDDD. Appropriate limits and compliance measures for the applicable mercury and hydrogen chloride standards should also be added.
4. The coal storage and handling operation are required to comply with a visible emission limit found in Condition E5-1. The conditions states, “Readings will be taken approximately every 15 seconds for any consecutive fifteen minute period...” EPA recommends that the permit be revised to clarify the required frequency of these readings.

#### Minor Editorial Changes

5. EPA Region 4’s Air and EPCRA Enforcement Branch has been renamed as the Air Enforcement and Toxics Branch. EPA recommends that Conditions B6 and E2 be updated to reflect this change.