



**Walter Wright, Jr.**  
wwright@mwlaw.com  
(501) 688.8839

## Air Enforcement: Tennessee Air Pollution Control Board Proposed Order Addressing Greenville, Tennessee, Metal Fabricating Facility

09/28/2022

The Tennessee Air Pollution Control Board ("Board") issued an August 30th Technical Secretary's Order and Assessment of Civil Penalty ("Order") to Workhorse Cabs, LLC dba Crenlo Engineered Cabs ("Workhorse"). See Case No. APC22-0078.

The Order addresses a complex metal fabrication facility ("Facility").

The Facility is stated to have been issued an operating permit on July 26, 2013, for a surface coating operation. The operating permit is stated to have been amended on May 18, 2020, following a change in ownership.

Board Division of Air Pollution Control personnel are stated to have conducted inspections at the Facility on March 10 and March 25th. The proposed Order provides that Workhorse was not able to produce the records that demonstrated workers who perform painting were certified as having completed the training described in 40 C.F.R. § 63.11516(d)(6) in Condition S2-8(d) of the operating permit.

The proposed Order requires that Workhorse provide training to all employees engaged in spray painting activities as described in the previously referenced Code of Regulations cite. Further, documentation must be submitted demonstrating that all employees engaged in spray painting activities are properly trained and certified within 30 days after receipt of the proposed Order.

The proposed Order assesses a civil penalty of \$1,500. The Order provides certain appeal rights.

A copy of the proposed Order can be downloaded [here](#).