

**From:** [Air Pollution Control](#)  
**To:** [APC Permitting](#)  
**Subject:** FW: Quint-C Pallet Inspection Follow-Up  
**Date:** Friday, December 4, 2020 10:19:04 AM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[Quint-C Pallet Co., Inc. \(Limestone 520756\) 2020 Inspection Support Document 12022020.pdf](#)  
[image007.png](#)

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**From:** Candace Justice <[Candace.Justice@tn.gov](mailto:Candace.Justice@tn.gov)>  
**Sent:** Friday, December 4, 2020 10:08  
**To:** Air Pollution Control <[Air.Pollution.Control@tn.gov](mailto:Air.Pollution.Control@tn.gov)>  
**Subject:** FW: Quint-C Pallet Inspection Follow-Up

Good morning,

Can you please log and upload the attached.

Facility 90-0213.

Thank you very much! Have a great weekend!



**Candace Justice** | Consultant  
Tennessee Division of Air Pollution Control  
Johnson City Environmental Field Office  
2305 Silverdale Drive  
Johnson City, TN 37601  
Office: 423-854-5416  
Main: 423-854-5400  
Tell us how we're doing! Please take 5-10 minutes to complete the [TDEC's Customer Service Survey](#).

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**From:** Andrea Russell <[arusell@uscompliance.com](mailto:arusell@uscompliance.com)>  
**Sent:** Thursday, December 3, 2020 3:36 PM  
**To:** Candace Justice <[Candace.Justice@tn.gov](mailto:Candace.Justice@tn.gov)>; Jill Pratt <[jill.Pratt@tn.gov](mailto:jill.Pratt@tn.gov)>  
**Cc:** Tammy Burchett <[tammy@quint-c.com](mailto:tammy@quint-c.com)>; Charles <[charles@quint-c.com](mailto:charles@quint-c.com)>; Seth Schramm <[sschramm@uscompliance.com](mailto:sschramm@uscompliance.com)>  
**Subject:** [EXTERNAL] Quint-C Pallet Inspection Follow-Up

Hello Candace and Jill:

Attached please find an Assessment and Compliance document for Quint-C Pallet for your review. I know there were questions about the changes made in 2016, and about a number of sources at the facility that are not listed in the facility's permit; the attached document should answer a lot of those questions. We're happy to set up a call to discuss any additional questions or data needs. Please let me know what additional information we can provide you or DAPC, or if you'd like a call to discuss.

Thank you,

Andrea Russell, on behalf of Quint-C Pallet.

**Andrea Russell, MS, QEP**  
Supervisor - Environmental  
U.S. COMPLIANCE  
952-567-5629 direct  
[arusell@uscompliance.com](mailto:arusell@uscompliance.com)  
[uscompliance.com](http://uscompliance.com)

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**From:** Andrea Russell  
**Sent:** Tuesday, November 24, 2020 4:39 PM  
**To:** 'Candace.Justice@tn.gov' <[Candace.Justice@tn.gov](mailto:Candace.Justice@tn.gov)>; 'Jill.Pratt@tn.gov' <[jill.Pratt@tn.gov](mailto:jill.Pratt@tn.gov)>  
**Cc:** 'Tammy Burchett' <[tammy@quint-c.com](mailto:tammy@quint-c.com)>; 'charles@quint-c.com' <[charles@quint-c.com](mailto:charles@quint-c.com)>; Seth Schramm <[sschramm@uscompliance.com](mailto:sschramm@uscompliance.com)>  
**Subject:** Quint-C Pallet Inspection Follow-Up

Hello Candace and Jill: My name is Andrea; I am assisting Tammy and Quint-C Pallet with your air compliance information request. I am currently reviewing your request and working with Tammy on the necessary response. My preliminary determination is that no changes have been made at the site beyond what is currently permitted that are modifications; I need to look further into the cyclone change to determine whether it was an op-flex change or whether it is just routine maintenance. I will provide documentation to support my conclusions, and will answer any other questions you have previously posed/or currently have. I am out of the office until November 30<sup>th</sup> but goal is to have a response to you by December 2, before the requested December 4<sup>th</sup> due date.

Thank you, and please reach out with questions,

Andrea Russell



**Andrea Russell, MS, QEP**  
Supervisor - Environmental  
U.S. COMPLIANCE  
952-567-5629 direct  
[arusell@uscompliance.com](mailto:arusell@uscompliance.com)  
[uscompliance.com](http://uscompliance.com)  
   

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#### COVID-19 Safe Work Measures

In order to stay safe and continue to provide optimal customer service, while at customer locations we will continue to:

- Follow social distancing guidelines and only work from locations where this can be maintained;
- Use appropriate PPE, including the use of a face covering; and
- Avoid areas with active or recent COVID-19 cases in the past 14 days that have not been thoroughly cleaned.

If we are unable to maintain these measures, for your safety and ours, we will remove ourselves from the immediate location and relocate to a suitable area. Additional details can be found at the [USC COVID-19 Resource Center](#).

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# AIR PERMITTING AND COMPLIANCE ASSESSMENT

## Quint-C Pallet

3769 Highway 11-E, Limestone, TN



### 1.0 Facility Air Permitting History and Purpose of Assessment

The Quint-C Pallet facility operates under a true minor operating permit (064560P) issued March 5, 2012. The operating permit covers:

*"Woodworking Operation with Cyclone Control....consisting of two gang rip saws and three other saws. Sawdust from the woodworking operations are transferred to semi-trailers for offsite disposal or to a hopper and exempt wood-fired heater for comfort heating. Two cyclones are used for control of particulate matter emissions".*

A copy of the permit is included as **Appendix A** to this document.

In 2016, the auger that moves sawdust from the woodworking operation was replaced. Ductwork was also replaced at this time; and the interior cladding of one of the cyclones was replaced with a different material for safety purposes. None of these changes resulted in increased production capacity beyond the maximum production capacity stated in the Permit and thus did not result in increased emissions.

Quint-C Pallet was inspected by the Tennessee Division of Air Pollution Control in October 2019, with a follow-up documentation request in November 2020. DAPC is requesting that the 2016 changes made to the woodworking operation, as well as several unpermitted sources be reviewed for permitting applicability and air regulatory compliance. The following document Sections describe emissions sources at the facility and provide support for compliance with applicable air regulations.

### 2.0 Facility Emission Sources

Emissions sources at Quint-C Pallet are described below:

Emission Unit or Process	Description
Permitted woodworking operation	Two gang rip saws, three other saws, two cyclones, one wood-fired heater for comfort heating.
2016 changes to permitted woodworking operation	Replacement of sawdust auger system, replacement of ductwork, re-clad of one cyclone's top interior with new liner material.
Wood drying kiln	0.75 MMBTU natural gas fired heated building ("kiln") used for drying pallets.
Bleach Spray building	Bleach-water spray operation for slowing mold growth on pallets.
Open burning of pallets at Tri-State Pallet	Tri-State Pallet is a "contiguous" location for air permitting purposes. The facility assembles pallets sawed at the Quint-C Pallet facility. Wood waste from the pallets is occasionally open burned in a pile at the Tri-State Pallet facility. No other emissions sources or processes occur at the Tri-State Pallet facility.

# AIR PERMITTING AND COMPLIANCE ASSESSMENT

## Quint-C Pallet

3769 Highway 11-E, Limestone, TN



US COMPLIANCE

### 3.0 Emission Source Regulatory Requirements

Emission Source	Applicable Regulation	Discussion
Permitted woodworking operation	Operating Permit No. 064560P	Woodworking operation as described in Permit.
	<i>Determination</i>	The permit accurately describes the woodworking operation and comfort heating unit.
Changes to permitted woodworking operation	Rule 1200-03-09-01(1)(aa)	Per Rule 1200-03-09-02-01(1)(aa) "Modification" is any physical change or change in the method of operation of an air contaminant source, which increases the amount of any air contaminant (to which an emission standard applies) emitted by such source or which results in the emissions of any air contaminant (to which an emission standard applies) not previously emitted.
	<i>Determination</i>	<p>The changes made do not meet the definition of "modification" as they are not a "physical change or a change in the method of operation...which (increases or adds) air contaminants emitted by the source.</p> <p>"Operational Flexibility" (Rule 1200-03-09-02-01(aa)4.) requires a 7-day advance notification to the TN Technical Secretary of changes made to an air contaminant source that are not "modifications" as defined above. An Operational Flexibility notification was not submitted for the changes to the permitted woodworking operation as the changes were not deemed "modifications" as they did not result in increased or added emissions. TN DAPC has requested these changes be processed under "Operational Flexibility" requirements. A completed Operational Flexibility Notification for the changes is included as <b>Appendix B</b> to this document.</p>
Wood drying kiln	Rule 1200-03-09-.04(4)(d)(17)	Fuel burning sources that are either gas fired or #2 oil fired with a heat input rate under 10 MMBTU/hr, where the combined total heat input rate at each location does not exceed 10 MMBTU/hr do not require an air permit.
	<i>Determination</i>	The natural gas fired kiln has a maximum heat input rating of 0.75 MMBTU/hr. All natural gas burning sources combined from Quint-C Pallet and Tri-State Pallet are less than 10 MMBTU/hr. The kiln does not require an air permit.
Bleach Spray building	Rule 12200-03-09-.04(5)(g)(28)	Equipment used for surface coating, painting, dipping, or spraying operations except those that will emit VOC or HAP
	<i>Determination</i>	The "bleach mix" is a 70% to 30% mix of water to "Chlor-San 12" (an 88% to 12% water to sodium hypochlorite mix; see SDS as <b>Appendix C</b> ). Since the "bleach mix" does not contain a regulated VOC or HAP, spraying it will not emit VOC or HAP and does not require an air permit.

# AIR PERMITTING AND COMPLIANCE ASSESSMENT

## Quint-C Pallet

3769 Highway 11-E, Limestone, TN



Emission Source	Applicable Regulation	Discussion
Open Burning of Wood Waste at Tri-State Pallet	Rule 1200-03-04-.04(1)(e)	<p>(e) Open Burning Fires disposing of “wood waste” solely for the disposition of such wood waste as provided in T.C.A. §68-201-115(c) is permitted. Priming materials used to facilitate such burning shall be limited to #1 or #2 grade fuel oils.</p> <p>The Open Burning at Tri-State Pallet must adhere to the following restrictions per T.C.A. §68-201-115(c):</p> <p>(A) At least one person shall be constantly present at the burning during the entire time of the burn;</p> <p>(B) Each burn shall not exceed forty-eight (48) hours in duration;</p> <p>(C) Burning shall not occur more than twice in any thirty-day period; and</p> <p>(D) If the burning occurs within one hundred feet (100') of an occupied building, it may only occur if an adult occupant of the building gives written authorization for the burn to occur and has not rescinded the authorization in writing.</p>
	<i>Determination</i>	Quint-C Pallet and Tri-State Pallet are considered “contiguous” sources with regards to air permitting; however, open burning as conducted on the Tri-State Property is permitted under Rule 1200-3-4-.04(1)(e).

# Appendix A

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



## OPERATING PERMIT Issued Pursuant to Tennessee Air Quality Act

Date Issued: MAR 05 2012

Permit Number:

064560P

Date Expires: December 1, 2021

Issued To:

Quint-C-Pallet Co., Inc.

Installation Address:

3769 Highway 11-E

Limestone

Installation Description:

Woodworking Operation with Cyclone Control

Emission Source Reference No.

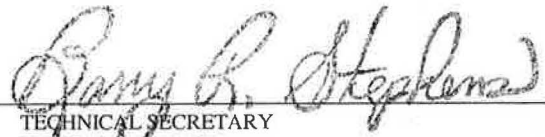
90-0213-01

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

### CONDITIONS:

1. The applications that were utilized in the preparation of this permit are dated April 28, 2011, and July 11, 2011, and are signed by Charles Hensley, President for the permitted facility. If this person terminates employment or is reassigned different duties and is no longer the responsible person to represent and bind the facility in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification shall be in writing and submitted within thirty (30) days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the facility in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

(conditions continued on 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.

NON-TRANSFERABLE

**POST AT INSTALLATION ADDRESS**

CN-0827 (Rev. 9-92)

RDA-1298

90-0123-01 <b>Source Description:</b>	Woodworking operation consisting of two gang rip saws and three other saws. Sawdust from woodworking operations are transferred to semi-trailers for offsite disposal or to a hopper and exempt wood-fired heater for comfort heating. Two cyclones are used for control of particulate matter emissions.
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2. The stated design input capacity for this source is 7,000 pounds per hour (lb/hr) on a daily average basis. The Technical Secretary may require the permittee to prove compliance with this rate. Tennessee Air Pollution Control Regulations (TAPCR) 1200-03-09-.02(6) and the application dated July 11, 2011.
3. Particulate matter emitted from this source shall not exceed 7.8 lb/hr. TAPCR 1200-03-07-.03(1).
4. Visible emissions from this source shall not exhibit greater than twenty percent (20%) opacity except for one six-minute period per one (1) hour or more than twenty four (24) minutes in any twenty four (24) hours. Visible emissions from this source shall be determined by EPA Method 9, as published in 40 CFR 60, Appendix A (six-minute average).
5. Fugitive emissions from this source shall be controlled as specified in Rule 1200-03-08-.01. Specifically, no person shall 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 1200-3-20. Fugitive emissions from this source shall be determined by Tennessee Visible Emissions Evaluation Method 4 as adopted by the Tennessee Air Pollution Control Board on April 16, 1986.
6. This source shall not operate without the use of the air pollution control devices. TAPCR 1200-03-09-.02(6) and the application dated July 11, 2011.
7. 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. These records must be retained for a period of not less than two (2) years. All maintenance activities (including any ongoing maintenance that has not been completed) shall be entered in the maintenance log no later than seven (7) days following the start of the maintenance. TAPCR 1200-03-20-.02(1), 1200-03-10-.02(2)(a).
8. The permittee shall apply for renewal of this permit not less than sixty (60) days prior to the permit expiration date, pursuant to Division Rule 1200-03-09-.02(3).

(end of conditions)

## Appendix B

December 2, 2020

Ms. Michelle Walker Owenby, Technical Secretary  
Tennessee Air Pollution Control Division  
William R. Snodgrass Tennessee Tower, 15<sup>th</sup> Floor  
312 Rosa L. Parks Avenue  
Nashville, Tennessee 37243

RE: Permit #064560P, Reference # 90-0213-01 Operational Flexibility Notification - Non-Title V Source

Dear Technical Secretary:

Quint-C Pallet made the following changes in March 2016 pursuant to TAPCR 1200-03-02-.01(1)(aa)4 (State regulation governing operational flexibility changes). Notification pursuant to the Rule was not submitted at the time of the changes; this communication serves as the required notification. No changes to emissions resulted from these changes, and no changes to Permit 064560P are being requested:

- One of the two permitted cyclones had the top interior lining replaced with a different liner material. The change did not affect maximum air flow, material throughput, or cyclone efficiency rates as permitted. This change does not impact potential or actual emissions on a lb/hr or ton/yr basis.
- A new screw auger was installed to replace an existing screw auger. This installation did not change or increase the maximum stated design input capacity of 7,000 lb/hr on a daily average basis as stated in Term 2 of the Permit. This change does not impact potential or actual emissions on a lb/hr or ton/yr basis.
- Ductwork was replaced and reconfigured where necessary to support the auger and cyclone changes. This change does not impact potential or actual emissions on a lb/hr or ton/yr basis.

This change does not exceed the allowable emission rate for particulate matter and does not constitute a title I modification. This change does not violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

Based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Sincerely,

Charles Hensley  
President, Quint-C Pallet



## Safety Data Sheet

### 1. Identification

Product Identifier : Chlor San 12

Recommended Uses : Sanitizer

Supplier : CP Industries Ltd.  
P.O. Box 300  
535 Dickson Drive  
Fergus, Ontario  
N1M 2W8

Emergency Telephone : (613) 996-6666 (CANUTEC)

### 2. Hazard Identification

Product Classifications :	Corrosive to Metals	Category 1
	Skin Corrosion/Irritation	Category 1
	Serious Eye Damage/Eye Irritation	Category 1

Symbols :



Signal Word : Danger

Hazard Statements : May be corrosive to metals.  
Causes severe skin burns and eye damage.

Precautionary Statements : Wear protective gloves and eye protection/face protection.  
Do not breathe mists.  
Wash thoroughly after handling.

IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water or shower. Wash contaminated clothing before reuse.

IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.

IF INHALED: Remove person to fresh air and keep comfortable for breathing.



Immediately call a POISON CONTROL CENTRE or doctor.  
Store locked up.  
Keep only in original packaging.  
Absorb spillage to prevent material-damage.  
Dispose of contents/container according to local, provincial and federal regulations.

### 3. Composition/Information on Ingredients

Hazardous Ingredients :

Chemical Name	CAS Number	Concentration (% w/w)
Sodium hypochlorite	7681-52-9	7 – 13

### 4. First Aid Measures

IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CONTROL CENTRE or doctor.

IF ON SKIN (or hair): Wash with plenty of water. Take off contaminated clothing and wash it before reuse. Immediately call a POISON CONTROL CENTRE or doctor.

IF SWALLOWED: Rinse mouth. Do NOT induce vomiting. Immediately call a POISON CONTROL CENTRE or doctor.

IF INHALED: Remove person to fresh air and keep comfortable for breathing. Immediately call a POISON CONTROL CENTRE or doctor.

Symptoms of Acute Exposure

Eye contact :	Burns, redness, watering, pain, loss of vision.
Skin contact :	Burns, redness, itching, swelling, damage to underlying tissues.
Ingestion :	Burns, irritation, swelling.
Inhalation :	Irritation of nose, throat and respiratory tract. Coughing, difficulty breathing and/or shortness of breath.

### 5. Fire Fighting Measures

Suitable Extinguishing Media :	As for surrounding fire. Suitable materials include water spray, dry chemical, carbon dioxide, and alcohol-resistant foam.
Unsuitable Extinguishing Media :	Not available.
Specific Hazards and Combustion Products :	During fire, gases hazardous to health may be formed. Combustion products include chlorine, hydrogen chloride.

Protective Equipment and Precautions  
for Firefighters :

As in any fire, wear a self-contained breathing apparatus in pressure-demand, MSHA/NIOSH (approved or equivalent), and full protective gear. Move containers from fire area if possible without risk. Keep containers cool with water spray. Collect contaminated fire extinguishing water and other media separately.

## 6. Accidental Release Measures

- Personal Precautions : Immediately evacuate personnel to safe areas. Keep people away from and upwind of spill/leak. Do not breathe vapour. Wear appropriate personal protective equipment (See Section 8: Exposure controls / Personal protection). Only trained and properly protected personnel must be involved in clean-up operations.
- Containment and Clean Up : Stop leak if it is safe to do so. Dike spilled material, where possible. Absorb with suitable inert dry material such as absorbent clay and place into closed containers for disposal. Avoid dispersal of spilled material or contact with soil or entry into waterways, sewers and drains. Dispose of contents/containers according to local, provincial, and federal regulations. Following product recovery, flush area with water.

## 7. Handling and Storage

- Handling : Avoid contact with skin, eyes, and clothing. Use personal protective equipment as required (See Section 8: Exposure controls / Personal protection). Wash thoroughly after handling.
- Storage : Keep away from incompatible materials (See Section 10: Stability and Reactivity). Keep away from metals and strong acids. Keep out of direct sunlight. Keep only in original packaging. Store in a cool, dry, well-ventilated place. Store locked up.

## 8. Exposure Controls/Personal Protection

Control Parameters :

Chemical Name	CAS Number	Value type	Permissible Concentration	Basis
Sodium hypochlorite	7681-52-9	TLV	Not established	

Engineering Controls : Ensure adequate ventilation.

Personal Protection :

- Eye/Face : Safety glasses or chemical splash goggles, and face shield.
- Skin : Chemical-resistant protective gloves.
- Respiratory : If exposure limits are exceeded or irritation is experienced, NIOSH/MSHA approved respiratory protection should be worn.

Other : Long pants and long sleeved shirt. Rubber boots and rubber apron as necessary.

## 9. Physical and Chemical Properties

Appearance :	Clear, yellow liquid
Odour :	Chlorine
Odour Threshold :	Not available
pH :	12 – 13
Freezing Point :	Not available
Boiling Point :	Not available
Flash Point :	Not available
Evaporation Rate :	Not available
Flammability :	Not available
Lower Flammability Limit :	Not available
Upper Flammability Limit :	Not available
Vapour Pressure :	Not available
Vapour Density :	Not available
Relative Density :	1.18
Solubility :	Complete in water
Partition Coefficient :	Not available
Auto-ignition Temperature :	Not available
Decomposition Temperature :	Not available
Viscosity :	Not available

## 10. Stability and Reactivity

Reactivity :	With incompatible materials. Contact with acids releases toxic chlorine gas.
Chemical stability :	Chemically stable.
Hazardous reactions :	With incompatible materials. Polymerization not expected to occur.
Conditions to avoid :	Avoid incompatible materials.
Incompatible materials :	Reducing agents, strong acids, metals.
Hazardous decomposition products :	Chlorine gas.

## 11. Toxicological Information

Routes of Exposure	
Eye contact :	Causes serious eye damage.
Skin contact :	Causes severe skin burns.
Ingestion :	Causes burns to mouth, throat and stomach.
Inhalation :	May cause irritation to nose, throat and respiratory tract.

#### Symptoms of Acute Exposure

Eye contact :	Burns, redness, watering, pain, loss of vision.
Skin contact :	Burns, redness, itching, swelling, damage to underlying tissues.
Ingestion :	Burns, irritation, swelling.
Inhalation :	Irritation of nose, throat and respiratory tract. Coughing, difficulty breathing and/or shortness of breath.

#### Calculated Acute Toxicity Estimates

Oral :	>10,000 mg/kg
Dermal :	>10,000 mg/kg
Inhalation :	Not available.

## 12. Ecological Information

Not available.

## 13. Disposal Considerations

Dispose of contents/container according to local, provincial and federal regulations.

## 14. Transportation Information

For transportation in a road vehicle or a railway vehicle :

TDG Classification :	UN Number:	1791
	Shipping Name :	HYPOCHLORITE SOLUTION
	Class :	8
	Subclass :	
	Packing Group :	III
	Limited Quantity :	5L

## 15. Regulatory Information

Not available.

## 16. Other Information

SDS Revision Date : November 22, 2017