

Justin Dolzen

From: Brandon Tate <btate@tatefabricating.com>
Sent: Thursday, April 29, 2021 1:57 PM
To: Justin Dolzen; Ronald Tate
Subject: [EXTERNAL] Re: 74-0087/978595 *Incomplete permit application*

Here is a link to the completed document you requested.

<https://www.dropbox.com/s/892gzf4estos2db/Subpart%206X%20Initial%20Notification%20-%20Fillable.pdf?dl=0>

Brandon Tate
for Tate Fabricating Company, Inc
561-459-9151

Get [Outlook for iOS](#)

From: Justin Dolzen <Justin.Dolzen@tn.gov>
Sent: Thursday, April 29, 2021 9:23:38 AM
To: Brandon Tate <btate@tatefabricating.com>; Ronald Tate <rtate@tatefabricating.com>
Subject: RE: 74-0087/978595 *Incomplete permit application*

Good morning Brandon,

I do need the Subpart 6X initial notification (attached) submitted within the next two days. This initial notification was specifically requested in both letters dated February 24, 2021 and October 23, 2020 and is subject to the April 30 deadline. The form is short and should only take a few minutes to fill out. Please let me know if you have any questions about it.

Thanks,
Justin

From: Brandon Tate <btate@tatefabricating.com>
Sent: Thursday, April 29, 2021 7:15 AM
To: Justin Dolzen <Justin.Dolzen@tn.gov>; Ronald Tate <rtate@tatefabricating.com>
Subject: [EXTERNAL] Re: 74-0087/978595 *Incomplete permit application*

Good morning, Justin.

I had reached out to Wheelabrator yesterday and am awaiting the flow and velocity values.

I am traveling out of town the remainder of this week. I will complete the additional requests when I return. If there should be any time restriction which needs immediate attention, please let me know.

Brandon Tate
for Tate Fabricating Company, Inc
m: 561-459-9151

Get [Outlook for iOS](#)

From: Justin Dolzen <Justin.Dolzen@tn.gov>
Sent: Wednesday, April 28, 2021 5:37:55 PM
To: Brandon Tate <btate@tatefabricating.com>; Ronald Tate <rtate@tatefabricating.com>
Subject: RE: 74-0087/978595 *Incomplete permit application*

Brandon,

Thank you for the additional information. According to those specifications, the Chromium and Nickel content of the steel processed by this facility exceeds 0.1%, so the blasting process will be subject to Subpart XXXXXX. Based on your description of the machining and grinding operations at this facility, I agree with your assessment that they're exempt. I'll need you to submit the 6X initial notification (attached) filled out to indicate that the dry abrasive blasting and welding processes are subject, as indicated in the incomplete letter.

According to the SDS the cutting solution used contains 1-3% VOC. I'll need you to submit some usage data for that solution to estimate potential VOC emissions. I don't need actual receipts or anything I just need to know the average and maximum usage on a daily basis.

There are a couple things missing from the APC 101 and 102 for the wheelabrator that I need.

1. Item 9: APC 102: Please specify the maximum rate of shot that the wheelabrator is capable of blasting in lb/hr.
2. Item 7 APC 101: Please specify exhaust flow rate from the wheelabrator. Dry standard cubic feet per minute will suffice.
3. Item 9 APC 101: Please specify how the efficiency of the cartridge control device is monitored and ensured. For example, pressure drop gauge, scheduled filter inspections and/or replacement, etc.
4. Item 10: Please submit PM emissions estimates. Average emissions should be based on the actual operating scenario. Potential emissions should be based on 8760 hours of operation per year. The emission factor published by EPA in AP-42: Compilation of Air Emission Factors Chapter 13.2.6 for shot blasting using shot while using a fabric filter is 0.069 lb PM per 1000 lb of shot. That factor may be used.

I'm sorry to hear that there were issues reaching someone at that number. I'll let my supervisor know that there was a problem receiving a response.

Thanks,
Justin

From: Brandon Tate <btate@tatefabricating.com>
Sent: Wednesday, April 28, 2021 3:08 PM
To: Justin Dolzen <Justin.Dolzen@tn.gov>; Ronald Tate <rtate@tatefabricating.com>
Subject: [EXTERNAL] Re: 74-0087/978595 *Incomplete permit application*

Justin,

Attached are the applications you provided for the wheelabrator shot peening/blast process. If you could please confirm they have been completed correctly. Upon review of the process, I am uncertain if this is applicable or require. Please let me know.

Note the wheelabrator is an enclosed and filtered system, and as referenced on the application, this process uses cast steel abrasive shot (SAE J827) and grit (SAE J1993) which is chemically inert and does not present any risk to people or to the environment (Reference W Abrasives Safety Data Sheet). Potential health risks are

linked to the exposure to the dust produced by the process. Emissions from the process are directed to a Down Flow Cartridge Dust Collector with four (4) Diversified Air Systems (DAS) 7FRO-2924 cartridges, each with 254 square feet of NANO fiber, MERV 15 efficiency which remove 99% of the particulate from the air stream. The cleaned air is then exhausted to the environment.

Additionally, Tate Fabricating Company, Incorporated does not conduct any dry milling or machining at our facility. Grinding is performed with hand tools/grinders which you had stated are specifically exempt. Tate has two band cold saws (Peddinghaus and KMT). Both units use a water-soluble solution for cooling the blade during cutting. Safety Data and Product sheets are attached.

The materials fabricated are carbon steel structural steel shapes of Grade ASTM A36 or A992. I have attached a representative mill test/chemistry report of the typical material which may be subject to the wheelabrator shot peening/blast, cutting, welding, and grinding (the fabricating process).

Reta Miller, within the accounting department at Tate Fabricating, reached out today and left multiple messages to pay the \$500 requested Construction Permit Application. She was unable to connect with anyone to take the payment. Subsequently a hard check has been printed (scanned image attached) and is being expedited to TN Department of Environment and Conservation for Permit No. 978595.

Brandon Tate
for Tate Fabricating Company, Incorporated
m: 561-459-9151

From: Justin Dolzen <Justin.Dolzen@tn.gov>
Sent: Monday, April 26, 2021 5:00 PM
To: Brandon Tate <btate@tatefabricating.com>; Ronald Tate <rtate@tatefabricating.com>
Subject: RE: 74-0087/978595 *Incomplete permit application*

I'll be out tomorrow, actually. If you want to go ahead and send me some questions tomorrow though, please do. I'll take a look at them first thing Wednesday morning. Otherwise, I'm available anytime on Wednesday.

Thanks,
Justin

From: Brandon Tate <btate@tatefabricating.com>
Sent: Monday, April 26, 2021 3:03 PM
To: Justin Dolzen <Justin.Dolzen@tn.gov>; Ronald Tate <rtate@tatefabricating.com>
Subject: [EXTERNAL] Re: 74-0087/978595 *Incomplete permit application*

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

Thank you for reaching out. I'm travel today and will be in touch tomorrow so we may finalize any remaining details you may need.

Brandon Tate for

Tate Fabricating Company, Inc.
561-459-9151

Get [Outlook for iOS](#)

From: Justin Dolzen <Justin.Dolzen@tn.gov>
Sent: Monday, April 26, 2021 3:15:37 PM
To: Ronald Tate <rtate@tatefabricating.com>
Cc: Brandon Tate <btate@tatefabricating.com>
Subject: FW: 74-0087/978595 *Incomplete permit application*

Mr. Tate,

Just wanted to follow up again on this incomplete letter (attached) since the deadline is this Friday. Please let me know if you have any questions.

Thanks,



Justin Dolzen | Environmental Protection Specialist
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243
p. 615-532-0575

Hours: M,W-F: 7:30 am – 6 pm CST

www.tn.gov/environment/air.shtml

Tell us how we're doing! Please take 5-10 minutes to complete our survey see below.

External Customers: [customer satisfaction survey](#).

Internal (TDEC Divisions) Customers: [customer satisfaction survey](#).

This electronic mail may be subject to the Tennessee Public Records Act, Tenn. Code Ann. §10-7-503 et seq. Any reply to this email may also be subject to this act.

From: Justin Dolzen
Sent: Monday, April 12, 2021 6:00 PM
To: Ronald Tate <rtate@tatefabricating.com>
Cc: btate@tatefabricating.com
Subject: 74-0087/978595

Mr. Tate,

This is a courtesy reminder that the deadline to submit the information requested by the attached letter is April 30, 2021. Please let me know if you have any questions while preparing the information.

Thank you,



Justin Dolzen | Environmental Protection Specialist

Division of Air Pollution Control

William R. Snodgrass Tennessee Tower, 15th Floor

312 Rosa L. Parks Avenue

Nashville, TN 37243

p. 615-532-0575

Hours: M,W-F: 7:30 am – 6 pm CST

www.tn.gov/environment/air.shtml

Tell us how we're doing! Please take 5-10 minutes to complete our survey see below.

External Customers: [customer satisfaction survey](#).

Internal (TDEC Divisions) Customers: [customer satisfaction survey](#).

This electronic mail may be subject to the Tennessee Public Records Act, Tenn. Code Ann. §10-7-503 et seq. Any reply to this email may also be subject to this act.

Initial Notification

National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories 40 CFR 63 Subpart XXXXXX

Section 1: Facility Information

☒ Yes, I am subject to 40 CFR Part 63 subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

Source category and NAICS code(s) Fabricated Structural Metal Manufacturing, NAISC Code: 332312

Compliance Date: ☒ Existing source: July 25, 2011 ☐ New source: _____
(Date of startup)

☐ No, I am NOT subject to 40 CFR Part 63 subpart XXXXXX. Reason not applicable:

If you checked the "No" box above, please complete only Section 1 of this form and then proceed directly to Section 3 of this form (skip Section 2).

Company name Tate Fabricating Company, Incorporated

Facility name (if different): _____

Facility (physical location) address: 419 Industrial Drive
White House, Tennessee 37188

Owner name/title: Ronald F. Tate

Owner/company address: 419 Industrial Drive

Owner telephone number 615-672-4909

Owner email address (if available): rtate@tatefabricating.com

Is the Operator the same person as the Owner? Yes ☒ No ☐

If the Operator information is different from the Owner, please provide the following:

Operator name/title: _____

Operator telephone number: _____

Operator email address (if available): _____

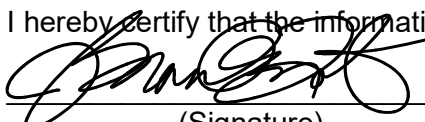
Section 2: Identification of Affected Operations

The following are the operations at this facility subject¹ to Subpart XXXXXX
(check all that apply):

Dry Abrasive Blasting		
	(1) Totally enclosed and unvented blast chambers	<input type="checkbox"/>
	(2) Vented enclosures with a filtration control device	<input checked="" type="checkbox"/>
	(3) Objects over 8 feet in any dimension without a filtration control device (includes outdoor blasting of objects over 8 ft in any dimension)	<input type="checkbox"/>
Dry Machining		
<input type="checkbox"/>		
Dry Grinding or Dry Polishing with Stationary Machines		
<input type="checkbox"/>		
Spray Painting		
	(1) In a spray booth	<input type="checkbox"/>
	(2) Without a spray booth (for Fabricated Structural Metal facilities or any objects over 15 feet)	<input type="checkbox"/>
Welding		
	(1) Use less than 2,000 pounds of MFHAP-containing ^b welding rod or wire annually	<input type="checkbox"/>
	(2) Use 2,000 pounds or more of MFHAP-containing ^b welding rod or welding wire annually	<input checked="" type="checkbox"/>

Section 3: Certification

I hereby certify that the information presented herein is correct to the best of my knowledge.


(Signature)

J Brandon Tate
(Name/title)

April 29, 2021
(Date)

(561) 459-9151
(Telephone No.)

¹ **Important Note:** These operations are affected sources under subpart XXXXXX only if/when they use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP). **MFHAP containing/potential** is defined to be when the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead, are used or have the potential to be emitted in quantities of 0.1 percent or more, or 1.0 percent or more for elemental of compounds of manganese.