



**STATE OF TENNESSEE
AIR POLLUTION CONTROL BOARD
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE**

PERMIT TO CONSTRUCT / MODIFY AND OPERATE AIR CONTAMINANT SOURCE(S)

Permit Number: 078595
Facility (Permittee): Tate Fabricating Company, Inc.
Facility ID: 74-0087
Facility Address: 419 Industrial Drive, White House
Robertson County
Facility Classification: True Minor
Federal Requirements: 40 CFR 63, Subpart XXXXXX
Facility Description: Metal fabrication facility

Permit 078595, consisting of 26 pages is hereby issued November 24, 2021, pursuant to the Tennessee Air Quality Act and by the Technical Secretary, Tennessee Air Pollution Control Board, Department of Environment and Conservation. This permit supersedes all previously issued permits for this/these source(s). This permit expires on October 1, 2031. 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 (TAPCR).

Michelle W. Owenby
Technical Secretary
Tennessee Air Pollution Control Board

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.

Section I – Sources Included in this Permit

FACILITY DESCRIPTION			
Source Number	Source Description	Status	Control Device/Equipment
01	Surface Coating Operation	Existing	None
02	Welding Operation	Existing	None
03	Abrasive Blasting Operation	Existing	Cartridge Filter

Section II – Permit Record

Permit Type	Description of Permit Action	Issue Date
Initial	Initial Permit Issuance	November 24, 2021

Section III - General Permit Conditions

G1. Responsible Person

The application that was utilized in the preparation of this permit is dated October 6, 2020, and is signed by Ronald F. Tate, President, the Responsible Person for the permittee. Additional application materials were received April 28, 2021, and August 4, 2021. The Responsible Person may be the owner, president, vice-president, general partner, plant manager, environmental/health/safety coordinator, or other person that is able to represent and bind the facility in environmental permitting affairs. If this Responsible Person terminates their employment or is assigned different duties and is no longer the person to represent and bind the permittee in environmental permitting affairs, the new Responsible Person for the permittee shall notify the Technical Secretary of the change in writing. The Notification shall include the name and title of the new Responsible Person assigned by the permittee to represent and bind the permittee in environmental permitting affairs, and the date the new Responsible Person was assigned these duties.

Should a change in the Responsible Person occur, the new Responsible Person must submit the Notification provided in Appendix 1 of this permit no later than 30 days after the change. A separate notification shall be submitted for each subsequent change in Responsible Person.

TAPCR 1200-03-09-.03(8)

G2. Application and Agreement Letters

This source shall operate in accordance with the terms of this permit, the information submitted in the approved permit application referenced in **Condition G1**, and any documented agreements made with the Technical Secretary.

TAPCR 1200-03-09-.01(1)(d)

G3. Submittals

Unless otherwise specified within this permit, the permittee shall submit all plans, checklists, certifications, notifications, test protocols, reports, applications, and fees to the attention of the following Division Programs at the addresses indicated in the table below:

Permitting Program	Compliance Validation Program	Field Services Program
<ul style="list-style-type: none">• Notifications• Startup certifications• Applications• NSPS reports• MACT/GACT/NESHAP reports• Fees• Emission Statements	<ul style="list-style-type: none">• Test protocols• Emission test reports• Visible emission evaluation reports	<ul style="list-style-type: none">• Semiannual reports• Annual compliance certifications
Division of Air Pollution Control William R. Snodgrass TN Tower, 15 th Floor 312 Rosa L. Parks Avenue Nashville, TN 37243 Air.Pollution.Control@tn.gov		Division of Air Pollution Control Nashville Environmental Field Office 711 R.S. Gass Boulevard Nashville, TN 37216 APC.NashEFO@tn.gov

The permittee shall submit the information identified above as requested in this permit. In lieu of submitting this information to the mailing addresses above, the permittee may submit the information to the attention of the respective Division Programs via e-mail in Adobe Portable Document format (PDF) to the specified email address.

TAPCR 1200-03-09-.03(8)

G4. Notification of changes

The permittee shall notify the Technical Secretary for any of the following changes to a permitted air contaminant source which would not be a modification requiring a new construction permit:

- change in air pollution control equipment that does not result in an increase or otherwise meet the definition of a modification
- change in stack height or diameter
- change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

The permittee must submit the Notification provided in Appendix 2 of this permit 30 days before the change is commenced.

TAPCR 1200-03-09-.02(7)

G5. Permit Transference

- A. This permit is not transferable from one air contaminant source to another air contaminant source or from one location to another location. The permittee must submit a construction permit application for a new source to the Permitting Program not less than 90 days prior to the estimated starting date of these events. If the new source will be subject to major New Source Review, the application must be submitted not less than 120 days in advance of the estimated starting date of these events.

TAPCR 1200-03-09-.03(6)(b) and 1200-03-09-.01(1)(b)

- B. In the event an ownership change occurs at this facility, the new owner must submit the notification provided in Appendix 3 of this permit. The written notification must be submitted by the new owner to the Permitting Program no later than 30 days after the ownership change occurs. If the change in ownership results in a change in Responsible Person for the facility, notification of the change in Responsible Person must also be submitted, as specified in **Condition G1**.

TAPCR 1200-03-09-.03(6)(a) and (b)

G6. Operating Permit Application Submittal

- A. The permittee shall apply for an operating permit renewal not less than 60 days prior to the permit's expiration date.

TAPCR 1200-03-09-.02(3)(a)

- B. Operation of each air contaminant source shall be in accordance with the provisions and stipulations set forth in this permit, all provisions of the Tennessee Division of Air Pollution Control Regulations, and all provisions of the Tennessee Air Quality Act.

TAPCR 1200-03-09-.02(6)

G7. Startup Certification for New or Modified Source(s)

Not Applicable

G8. Fees

The air contaminant source(s) identified in this permit shall comply with the requirements for payment of applicable annual emission fees to the Tennessee Division of Air Pollution Control based on the Administrative Fees Schedule I provided in Appendix 5 of this permit. The fee must be paid to the Division in full by the first day of the month that the fee is due (determined from Appendix 5). (Note: not all facilities are required to pay annual emission fees)

TAPCR 1200-03-26-.02

G9. General Recordkeeping Requirements

- A. All recordkeeping requirements for all data required to be recorded shall follow the following schedules:

For Daily Recordkeeping	For Weekly Recordkeeping	For Monthly Recordkeeping
No later than seven days from the end of the day for which the data is required.	No later than seven days from the end of the week for which the data is required.	No later than 30 days from the end of the month for which the data is required.

- B. The information contained in logs, records, and submittals required by this permit shall be kept at the facility's address, unless otherwise noted, and provided to the Technical Secretary or a Division representative upon request. Computer-generated logs are acceptable. Compliance is assured by retaining the logs, records, and submittals specified in this permit for a period of not less than five years at the facility's address.

TAPCR 1200-03-10-.02(2)(a)

G10. Routine Maintenance Requirements

The permittee shall maintain and repair the emission source, associated air pollution control device(s), and compliance assurance monitoring equipment as required to maintain and assure compliance with the specified emission limits.

TAPCR 1200-03-09-.03(8)

Compliance Method: Records of all repair and maintenance activities required above 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 five years. The date each maintenance and repair activity began shall be entered in the log no later than seven days following the start of the repair or maintenance activity, and the completion date shall be entered in the log no later than seven days after activity completion.

G11. Visible and Fugitive Emissions

- A. Unless otherwise specified, visible emissions from this facility shall not exhibit greater than 20% opacity, except for one six-minute period in any one hour period, and for no more than four six-minute periods in any 24 hour period. A stack is defined as any chimney, flue, conduit, exhaust, vent, or opening of any kind whatsoever, capable of, or used for, the emission of air contaminants.

Compliance Method: When required to demonstrate compliance, visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

TAPCR 1200-03-05-.01(1) and 1200-03-05-.03(6)

- B. The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Reasonable precautions shall include, but are not limited to, the following:
- (a) Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
 - (b) Application of asphalt, water, or suitable chemicals on dirt roads, material stock piles, and other surfaces which can create airborne dusts;
 - (c) Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five minutes per hour or 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 TAPCR 1200-03-20. A malfunction is defined as, any sudden and unavoidable failure of process equipment or for a process to operate in an abnormal and unusual manner. Failures that are caused by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

Compliance Method: Fugitive emissions shall be determined by Tennessee Visible Emissions Evaluation Method 4 as adopted by the Tennessee Air Pollution Control Board on April 16, 1986.

TAPCR 1200-03-08-.01(1) and 1200-03-08-.01(2)

C. Fugitive emissions from roads and parking areas shall not exhibit greater than 10% opacity.

Compliance Method: When required to demonstrate compliance, fugitive emissions from roads and parking areas shall be determined by utilizing Tennessee Visible Emissions Evaluation (TVEE) Method 1, as adopted by the Tennessee Air Pollution Control Board on April 29, 1982, as amended on September 15, 1982 and August 24, 1984.

TAPCR 1200-03-08-.03

G12. Facility-wide Limitations

Not Applicable

G13. NSPS/NESHAP/MACT/GACT Standards

The following source(s) shall comply with all applicable requirements of the NESHAP standards as indicated in the table below:

Source Number	NESHAP/MACT GACT	NSPS
01	Not Applicable	Not Applicable
02	40 CFR 63, Subpart XXXXXX	Not Applicable
03	40 CFR 63, Subpart XXXXXX	Not Applicable

TAPCR 1200-03-09-.03(8)

Compliance Method: Compliance methods are provided in **Section IV** of this permit.

G14. VOC and NO_x Emission Statement

Not Applicable

G15. Source Testing Requirements

Not applicable

Section IV – Federal and/or State Only Requirements

F1-1. Pursuant to 40 CFR §63.11514(a), welding and dry abrasive blasting operations located at an area source of hazardous air pollutants (HAP) primarily engaged in Fabricated Structural Metal Manufacturing, that use materials that contain metal fabrication or finishing HAP (MFHAP) as defined in 40 CFR §63.11522, are subject to and shall comply with all applicable requirements of 40 CFR Part 63, Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (Subpart XXXXXX). The applicable provisions of Subpart XXXXXX are incorporated into this permit pursuant to TAPCR 1200-03-09-.03(8).

A copy of the Initial Notification, required by 40 CFR §63.11519(a)(2), was submitted to the Division on April 29, 2021.

F1-2. Per the initial notification dated April 29, 2021, the permittee's dry blasting operation (Source 03) utilizes vented enclosures with a filtration device. Therefore, the permittee must comply with the requirements and implement the management practices below, as applicable, for each dry abrasive blasting operation that uses materials that contain MFHAP or has the potential to emit MFHAP. These requirements do not apply when abrasive blasting operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.

- (1) For each new or existing dry abrasive blasting affected source which consists of a dry abrasive blasting operation which has a vent allowing any air or blast material to escape, the permittee must comply with the requirements in paragraphs (i) and (ii) of this section.
 - (i) The permittee must capture emissions and vent them to a filtration control device. The permittee must operate the filtration control device according to manufacturer's instructions, and demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified by **Condition F1-10(4)**.
 - (ii) The permittee must implement the management practices to minimize emissions of MFHAP as specified in (A) through (C) below.
 - (A) Take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
 - (B) Enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials; and
 - (C) Operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions.

40 CFR §63.11516(a)(2)

Compliance Method: The permittee shall assure compliance with this condition by maintaining the records required by **Condition F1-10**.

F1-3. For each new or existing welding affected source, the permittee must comply with the requirements in paragraphs (1) and (2) of this condition for each welding operation that uses materials that contain MFHAP or has the potential to emit MFHAP. These requirements do not apply when welding operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.

- (1) The permittee must operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. The permittee must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices, as specified by the requirements in **Condition F1-10(4)**.
- (2) The permittee must implement one or more of the management practices specified in (i) through (v) below to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment.
 - (i) Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW) - also called metal inert gas welding (MIG));
 - (ii) Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;
 - (iii) Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;
 - (iv) Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and
 - (v) Use a welding fume capture and control system, operated according to the manufacturer's specifications.

40 CFR §63.11516(f)(1) and (2)

Compliance Method: The permittee shall assure compliance with this condition by compliance with **Condition F1-4** and by maintaining the records required by **Condition F1-10**.

F1-4. Per the application dated October 6, 2020, the permittee uses 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis). Therefore, the permittee must demonstrate that management practices or fume control measures specified in **Condition F1-3** are being implemented by complying with the requirements in paragraphs (1) through (6) of this condition. These requirements do not apply when welding operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.

- (1) The permittee must perform visual determinations of welding fugitive emissions as specified in **Condition F1-6** at the primary vent, stack, exit, or opening from the building containing the welding operations. The permittee must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in **Condition F1-10(2)**.
- (2) If visible fugitive emissions are detected during any visual determination required in paragraph (1) of this condition, the permittee must comply with the requirements in (i) and (ii) below.
 - (i) Perform corrective actions that include, but are not limited to, inspection of welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with **Condition F1-3(2)**. After completing such corrective actions, the permittee must perform a follow-up inspection for visible fugitive emissions in accordance with **Condition F1-5**, at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - (ii) Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, and submit with your annual certification and compliance report as required by **Condition F1-9**.
- (3) If visible fugitive emissions are detected more than once during any consecutive 12-month period (notwithstanding the results of any follow-up inspections), the permittee must comply with paragraphs (i) through (iv) below.
 - (i) Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, the permittee must conduct a visual determination of emissions opacity, as specified in **Condition F1-7**, at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - (ii) In lieu of the requirement of paragraph (1) of this condition to perform visual determinations of fugitive emissions with EPA Method 22, the permittee must perform visual determinations of emissions opacity in accordance with **Condition F1-8** using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - (iii) The permittee must keep a record of each visual determination of emissions opacity performed in accordance with paragraphs (3)(i) or (ii) of this condition, along with any subsequent corrective action taken, in accordance with the requirements in **Condition F1-10(3)**.
 - (iv) The permittee must report the results of all visual determinations of emissions opacity performed in accordance with paragraphs (3)(i) or (ii) of this condition, along with any subsequent corrective action taken, and submit with your annual certification and compliance report as required by **Condition F1-9(4)**.
- (4) For each visual determination of emissions opacity performed in accordance with paragraph (3) of this condition for which the average of the six-minute average opacities recorded is 20 percent or less but greater than zero, the permittee must perform corrective actions, including inspection of all welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with **Condition F1-3(2)**.

- (5) For each visual determination of emissions opacity performed in accordance with paragraph (3) of this condition for which the average of the six-minute average opacities recorded exceeds 20 percent, the permittee must comply with the requirements in (i) through (v) below.
- (i) The permittee must submit a report of exceedance of 20 percent opacity, along with the annual certification and compliance report, as specified in **Condition F1-9(5)**, and according to the requirements of **Condition F1-9**.
 - (ii) Within 30 days of the opacity exceedance, the permittee must prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in paragraph (6) of this condition. If the permittee has already prepared a Site-Specific Welding Emissions Management Plan in accordance with paragraph (6), the permittee must prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.
 - (iii) During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, the permittee must continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in **Condition F1-8** using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - (iv) The permittee must maintain records of daily visual determinations of emissions opacity performed in accordance with section (iii) of this paragraph, during preparation of the Site-Specific Welding Emissions Management Plan, in accordance with the requirements in **Condition F1-9(6)**.
 - (v) The permittee must include these records in the annual certification and compliance report, according to the requirements of **Condition F1-9**.
- (6) The Site-Specific Welding Emissions Management Plan must comply with the requirements in subparagraphs (i) through (iii) below.
- (i) Site-Specific Welding Emissions Management Plan must contain the information in (A) through (F) below.
 - (A) Company name and address;
 - (B) A list and description of all welding operations which currently comprise the welding affected source;
 - (C) A description of all management practices and/or fume control methods in place at the time of the opacity exceedance;
 - (D) A list and description of all management practices and/or fume control methods currently employed for the welding affected source;
 - (E) A description of additional management practices and/or fume control methods to be implemented pursuant to paragraph (5)(ii) of this condition, and the projected date of implementation; and
 - (F) Any revisions to a Site-Specific Welding Emissions Management Plan must contain copies of all previous plan entries, pursuant to (D) and (E) of this subparagraph.
 - (ii) The Site-Specific Welding Emissions Management Plan must be updated annually to contain current information, as required by (i)(A) through (C) of this paragraph, and submitted with the annual certification and compliance report, according to the requirements of **Condition F1-9**.
 - (iii) The permittee must maintain a copy of the current Site-Specific Welding Emissions Management Plan onsite in a readily accessible location for inspector review, in accordance with the requirements in **Condition F1-10(6)**.

40 CFR §63.11516(f)(3) through (8)

Compliance Method: The permittee shall assure compliance with this condition by maintaining the records required by **Condition F1-10**.

- F1-5.** Visual determination of fugitive emissions must be performed according to the procedures of EPA Method 22, of 40 CFR Part 60, Appendix A-7. The permittee must conduct the EPA Method 22 test while the affected source is operating under normal conditions. The duration of each EPA Method 22 test must be at least 15 minutes, and visible emissions will be considered to be present if they are detected for more than six minutes of the 15-minute period.

40 CFR §63.11517(a)

Compliance Method: The permittee shall assure compliance with this condition by maintaining the records required by **Condition F1-10**.

F1-6. Visual determinations of fugitive emissions must be performed in accordance with **Condition F1-5** and according to the schedule in paragraphs (1) through (4) of this condition.

- (1) Perform visual determination of fugitive emissions once per day, on each day the process is in operation, during operation of the process.
- (2) If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests, performed in accordance with paragraph (1) of this condition for 10 days of work day operation of the process, the permittee may decrease the frequency of EPA Method 22 testing to once every five days of operation of the process (one calendar week). If visible fugitive emissions are detected during these tests, the permittee must resume EPA Method 22 testing of that operation once per day during each day that the process is in operation, in accordance with paragraph (1) of this condition.
- (3) If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests performed in accordance with paragraph (2) of this condition, the permittee may decrease the frequency of EPA Method 22 testing to once per 21 days of operation of the process (one calendar month). If visible fugitive emissions are detected during these tests, the permittee must resume weekly EPA Method 22 tests in accordance with paragraph (2) of this condition.
- (4) If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests performed in accordance with paragraph (3) of this condition, the permittee may decrease the frequency of EPA Method 22 testing to once per 60 days of operation of the process (3 calendar months). If visible fugitive emissions are detected during these tests, the permittee must resume monthly EPA Method 22 tests in accordance with paragraph (3) of this condition.

40 CFR §63.11517(b)

Compliance Method: The permittee shall assure compliance with this condition by maintaining the records required by **Condition F1-10**.

F1-7. Visual determination of emissions opacity must be performed in accordance with the procedures of EPA Method 9, of 40 CFR Part 60, Appendix A-4, and while the affected source is operating under normal conditions. The duration of the EPA Method 9 test shall be 30 minutes.

40 CFR §63.11517(c)

Compliance Method: The permittee shall assure compliance with this condition by maintaining the records required by **Condition F1-10**.

F1-8. The permittee must perform visual determination of emissions opacity in accordance with **Condition F1-7** and according to the schedule in paragraphs (1) through (5) of this condition.

- (1) Perform visual determination of emissions opacity once per day during each day that the process is in operation.
- (2) If the average of the six-minute opacities recorded during any of the daily consecutive EPA Method 9 tests performed in accordance with paragraph (1) of this condition does not exceed 20 percent for 10 days of operation of the process, the permittee may decrease the frequency of EPA Method 9 testing to once per five

days of consecutive work day operation. If opacity greater than 20 percent is detected during any of these tests, the permittee must resume testing every day of operation of the process according to the requirements of paragraph (1) of this condition.

- (3) If the average of the six-minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (2) of this condition does not exceed 20 percent for four consecutive weekly tests, the permittee may decrease the frequency of EPA Method 9 testing to once per every 21 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any monthly test, the permittee must resume testing every five days of operation of the process according to the requirements of paragraph (2) of this condition.
- (4) If the average of the six-minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (3) of this condition does not exceed 20 percent for three consecutive monthly tests, the permittee may decrease the frequency of EPA Method 9 testing to once per every 120 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any quarterly test, the permittee must resume testing every 21 days (month) of operation of the process according to the requirements of paragraph (3) of this condition.
- (5) If, after two consecutive months of testing, the average of the six-minute opacities recorded during any of the monthly EPA Method 9 tests performed in accordance with paragraph (3) of this condition does not exceed 20 percent, the permittee may resume EPA Method 22 testing as in **Condition F1-6(3) and (4)**. In lieu of this, the permittee may elect to continue performing EPA Method 9 tests in accordance with paragraphs (3) and (4) of this condition.

40 CFR §63.11517(d)

Compliance Method: The permittee shall assure compliance with this condition by maintaining the records required by **Condition F1-10**.

F1-9. The permittee must prepare and submit annual certification and compliance reports for each affected source according to the requirements of paragraphs (1) through (3) of this condition.

- (1) The permittee must prepare and submit each annual certification and compliance report according to the dates specified in (i) through (iii) below. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
 - (i) The first annual certification and compliance report must cover the first annual reporting period which begins January 1, 2022, and ends on December 31, 2022.
 - (ii) Each subsequent annual certification and compliance report must cover the subsequent annual reporting period from January 1 through December 31.
 - (iii) Each annual certification and compliance report must be prepared and submitted no later than January 31 and kept in a readily accessible location for inspector review. If an exceedance has occurred during the year, each annual certification and compliance report must be submitted along with the exceedance reports, and postmarked or delivered no later than January 31.
- (2) The annual certification and compliance report must contain the information specified in (i) through (iii) below, and the information specified in paragraph (3) of this condition that is applicable to each affected source.
 - (i) Company name and address;
 - (ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and
 - (iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

- (3) The annual certification and compliance report must contain the information specified in (i) through (iii) below for each affected source which performs visual determination of fugitive emissions in accordance with **Condition F1-5**.
- (i) The date of every visual determination of fugitive emissions which resulted in detection of visible emissions;
 - (ii) A description of the corrective actions taken subsequent to the test; and
 - (iii) The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.
- (4) The annual certification and compliance report must contain the information specified in sections (i) through (iii) of this paragraph for each affected source which performs visual determination of emissions opacity in accordance with **Condition F1-7**.
- (i) The date of every visual determination of emissions opacity;
 - (ii) The average of the six-minute opacities measured by the test; and
 - (iii) A description of any corrective action taken subsequent to the test.
- (5) As required by **Condition F1-4(5)(i)**, the permittee must prepare an exceedance report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds 20 percent. This report must be submitted along with the annual compliance certification and compliance report according to the requirements in paragraph (1) of this condition and must contain the information in (i) and (ii) below.
- (i) The date on which the exceedance occurred; and
 - (ii) The average of the six-minute average opacities recorded during the visual determination of emissions opacity.
- (6) The permittee must submit a copy of the records of daily visual determinations of emissions recorded in accordance with **Condition F1-4(5)(iv)** and a copy of the Site-Specific Welding Emissions Management Plan and any subsequent revisions to the plan pursuant to **Condition F1-4(6)** along with the annual certification and compliance report, according to the requirements in paragraph (1) of this condition.

The annual certification and compliance report shall be submitted either by hard copy or email to:

Hard Copy to:
Technical Secretary
Tennessee Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243

or

Adobe Portable Document Format (PDF) Copy to:
Air.Pollution.Control@tn.gov

40 CFR §63.11519(b)

Compliance Method: The permittee shall assure compliance with this condition by maintaining the records required by **Condition F1-10**.

F1-10. The permittee must collect and keep records of the data and information specified in paragraphs (1) through (7) of this condition, according to the requirements in paragraph (8).

- (1) Maintain information specified in (i) and (ii) below for each affected source.
- (i) Each notification and report that the permittee submitted to comply with Subpart XXXXXX, and the documentation supporting each notification and report.

- (ii) Records of the applicability determinations as in 40 CFR §63.11514(b)(1) through (5), listing equipment included in its affected source, as well as any changes to that and on what date they occurred, must be maintained for 5 years and be made available for inspector review at any time.
- (2) Maintain a record of the information specified in (i) through (iii) below for each affected source which performs visual determination of fugitive emissions in accordance with **Condition F1-5**.
 - (i) The date and results of every visual determination of fugitive emissions;
 - (ii) A description of any corrective action taken subsequent to the test; and
 - (iii) The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions.
- (3) Maintain a record of the information specified in (i) through (iii) below for each affected source which performs visual determination of emissions opacity in accordance with **Condition F1-7**.
 - (i) The date of every visual determination of emissions opacity; and
 - (ii) The average of the six-minute opacities measured by the test; and
 - (iii) A description of any corrective action taken subsequent to the test.
- (4) Maintain a record of the manufacturer's specifications for the control devices used to comply with **Conditions F1-2, F1-3, and F1-4**.
- (5) The permittee must maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of a Site-Specific Welding Emissions Management Plan, in accordance with **Condition F1-4(5)(iii)**.
- (6) If the permittee has been required to prepare a plan in accordance with **Condition F1-4(5)(iii)**, the permittee must maintain a copy of the current Site-Specific Welding Emissions Management Plan onsite and it must be readily available for inspector review.
- (7) If the permittee complies with Subpart XXXXXX by operating any equipment according to manufacturer's instruction, the permittee must keep these instructions readily available for inspector review.
- (8) The permittee must maintain records according to the requirements in (i) through (iii) below.
 - (i) The records must be in a form suitable and readily available for expeditious review, according to 40 CFR §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
 - (ii) As specified in 40 CFR §63.10(b)(1), each record must be kept for 5 years following the date of each occurrence, measurement, corrective action, report, or record.
 - (iii) Each record must be kept onsite for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record according to 40 CFR §63.10(b)(1). Records may be kept off-site for the remaining 3 years.

40 CFR §63.11519(c)(1) through (4), (11) through (13), and (15)

F1-11. The provisions in 40 CFR part 63, Subpart A, applicable to this affected source are specified in Table 2 to Subpart XXXXXX of Part 63 (**Appendix 9**).

40 CFR §63.11523

F1-12. The permittee is placed on notice that machining operations located at an area source of hazardous air pollutants (HAP) primarily engaged in metal product fabrication operations, which use materials that contain MFHAP, except for hand-held devices and any process employing fluids for lubrication or cooling, are subject to 40 CFR Part 63, Subpart XXXXXX. Information included with the application dated April 28, 2021, indicates no "machining" as defined in §63.11522 occurs at this facility. Use of a machining operation will subject the facility to all applicable

requirements of Subpart XXXXXX upon first use of such an operation, including the initial notification requirements of §63.11519(a)(1). Additionally, the facility must apply for and receive a construction permit pursuant to TAPCR 1200-03-09-.01(1) prior to installation/modification of the equipment.

TAPCR 1200-03-09-.03(8)

F1-13. The permittee is placed on notice that dry grinding and dry polishing with machines operations located at an area source of hazardous air pollutants (HAP) primarily engaged in metal product fabrication operations, which use materials that contain MFHAP, except for hand grinding, hand polishing, and bench top dry grinding and dry polishing, are subject to 40 CFR Part 63, Subpart XXXXXX. Information included with the application dated April 28, 2021, indicates no “dry grinding and dry polishing with machines” as defined in §63.11522 occurs at this facility. Performance of dry grinding and dry polishing with machines will subject the facility to all applicable requirements of Subpart XXXXXX upon first use of such an operation, including the initial notification requirements of §63.11519(a)(1). Additionally, the facility must apply for and receive a construction permit pursuant to TAPCR 1200-03-09-.01(1) prior to installation/modification of the equipment.

TAPCR 1200-03-09-.03(8)

Section V - Source Specific Permit Conditions

Source Number	Source Description
01	Surface coating operation: Spray coating of large structural steel objects

S1-1. Input Limitation(s) or Statement(s) of Design

Not Applicable

S1-2. Production Limitation(s)

Not Applicable

S1-3. Operating Hour Limitation(s)

Not Applicable

S1-4. Emission Limitation(s)

- A. Particulate matter (PM) emitted from the surface coating operation shall not exceed 0.02 grains per dry standard cubic foot (gr/dscf) of exhaust gas (0.3 pounds per hour (lb/hr), on a daily average basis).

TAPCR 1200-03-07-.04(1)

Compliance Method: Compliance with this condition shall be assured by compliance with **Condition G11**.

- B. Volatile organic compound (VOC) emissions from this source shall not exceed 3.7 tons per 12 consecutive months.

TAPCR 1200-03-07-.07(2)

Compliance Method: The permittee shall demonstrate compliance with this condition by calculating actual quantities of VOC emitted each month and during each period of 12 consecutive months, and maintaining a log of this information in a format similar to that contained in the example log in **Appendix 8**. The as-supplied VOC content of all VOC-containing materials (all coatings, inks, adhesives, thinners, and solvents) to be used by this source shall be determined from Safety Data Sheets (SDS) or manufacturer or vendor formulation data which explicitly list the VOC content by weight. If new materials are used, or if material formulation is changed, the table shall be updated within 30 days from the initial date of usage of the new or altered material. Purchase orders and/or invoices for all VOC-containing materials, along with current SDS or manufacturer or vendor formulation data, must be maintained and kept available for inspection by the Technical Secretary or a Division representative. These records shall be retained in accordance with **Condition G9**.

S1-5. Source-Specific Visible Emissions Limitation(s)

Not Applicable

S1-6. The permittee is placed on notice that coating operations located at an area source of HAP at facilities primarily engaged in metal product fabrication operations, which perform spray application of coatings that contain MFHAP, except spray coating applications that meet the definition of tool or equipment repair operations, facility maintenance, or quality control activities as defined in 40 CFR §63.11522, are subject to 40 CFR Part 63, Subpart XXXXXX. The SDS for the coatings declared for use at the time of application did not indicate the presence of any target HAP. Use of a spray-applied coating that contains compounds of one or more MFHAP will subject the facility to all applicable requirements of Subpart XXXXXX upon first use of such material, including the initial notification requirements of §63.11519(a)(1). Additionally, the facility must apply for and receive a construction permit pursuant to TAPCR 1200-03-09-.01(1) prior to use of the coating.

TAPCR 1200-03-09-.03(8)

Source Number	Source Description
02	Welding Operation: Welding of large structural steel objects, subject to NESHAP 40 CFR 63, Subpart XXXXXX

S2-1. Input Limitation(s) or Statement(s) of Design

Not Applicable

S2-2. Production Limitation(s)

Not Applicable

S2-3. Operating Hour Limitation(s)

Not Applicable

S2-4. Emission Limitation(s)

Particulate matter (PM) emitted from the welding operation shall not exceed 0.02 grains per dry standard cubic foot (gr/dscf) of exhaust gas (0.3 lb/hr, on a daily average basis).

TAPCR 1200-03-07-.04(1)

Compliance Method: Compliance with this condition shall be assured by compliance with **Conditions F1-3 through F1-11**.

S2-5. Source-Specific Visible Emissions Limitation(s)

Not Applicable

S2-6. This source is subject to and shall comply with all applicable requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart XXXXXX, including but not limited to **Conditions F1-3 through F1-11** of this permit.

TAPCR 1200-03-09-.03(8)

Source Number	Source Description
03	Abrasive Blasting Operation: Abrasive blasting of large structural steel objects using steel shot and steel grit blast media with cartridge filter control, subject to NESHAP 40 CFR 63, Subpart XXXXXX

S3-1. Input Limitation(s) or Statement(s) of Design

The stated design capacity for this source (maximum of four blast wheels combined) is 120,000 pounds of steel shot and steel grit per hour.

TAPCR 1200-03-09-.01(1)(d)

Compliance Method: The permittee shall maintain documentation to substantiate the design capacity of the abrasive blasting operation. Documentation may include, but is not limited to, purchase records, manufacturer's specifications, operating manuals, or a tag affixed to the unit by the manufacturer. This information shall be kept readily accessible and made available upon request by the Technical Secretary or a Division representative. If the permittee wishes to increase or modify the design capacity of this source, a construction permit shall be applied for and received in accordance with TAPCR 1200-03-09-.01(1) prior to making the change.

S3-2. Production Limitation(s)

Not Applicable

S3-3. Operating Hour Limitation(s)

Not Applicable

S3-4. Emission Limitation(s)

Particulate matter (PM) emitted from this source shall not exceed 0.25 grains of dry standard cubic foot of exhaust gas (11.3 lbs/hr, on a daily average basis).

TAPCR 1200-03-07-.04(2)

Compliance Method: Compliance with this condition shall be assured by operating the control equipment at all times during operation of this source, compliance with **Condition F1-2**, and maintaining copies of all applicable records required by **Condition F1-10**.

S3-5. Source-Specific Visible Emissions Limitation(s)

Not Applicable

S3-6. This source is subject to and shall comply with all applicable requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart XXXXXX, including but not limited to **Conditions F1-2, F1-10, and F1-11** of this permit.

TAPCR 1200-03-09-.03(8)

(end of conditions)

The permit application gives the location of this source as 36.479742 Latitude and -86.683690 Longitude.

Appendix 1: Notification of Change in Responsible Person

Facility (Permittee) _____ Tate Fabricating Company, Inc. _____

Facility ID _____ 74-0087 _____

Former Responsible Person _____
Name Title

New Responsible Person _____
Name Title

Email

Date New Responsible Person was assigned this duty: _____

As the Responsible Person of the above mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

Appendix 2: Notification of Changes

Facility (Permittee) Tate Fabricating Company, Inc.

Facility ID 74-0087

Source No. _____

	Control Equipment	Stack Height (Feet)	Stack Diameter (Feet)	Exit Velocity (Feet/Second)	Exit Temperature (°F)
Current					
Proposed					
Current					
Proposed					
Current					
Proposed					

Comments:

As the Responsible Person of the above mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

Appendix 3: Notification of Ownership Change

Facility (Permittee) Tate Fabricating Company, Inc. (Previous Owner)

Facility ID 74-0087

Facility (Permittee) _____ (New Owner)

Email Address _____

Secretary of State Control Number _____ [as registered with the TN Secretary of State]

Date of Ownership Change _____

Comments:

As the responsible person for the new owner or operator of the above mentioned facility (permittee):

- I agree to not make any changes to the stationary source(s) that meet the definition of modification as defined in Division 1200-03 or Division 0400-30¹, and
- I agree to comply with the conditions contained in **the permits listed below**, Division 1200-03 and Division 0400-30 of the Tennessee Air Pollution Control Regulations, the Tennessee Air Quality Act, and any documented agreements made by the previous owner to the Technical Secretary.

List all active permits issued to the facility for which the owner wishes to assume ownership:

As the Responsible Person of the above mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

¹ Appropriate application forms must be submitted prior to modification of the stationary source(s).

Appendix 4: Startup Certification

Not Applicable

Appendix 5: Fees

All minor and conditional major source annual emission fees are due and payable to the Division in full according to SCHEDULE I below² unless otherwise specified in TAPCR 1200-03-26-.02(6)(c). The county that a source is located in determines when the minor source annual emission fee is due. Fees are due the first day of the month listed. If a source is located on contiguous property in more than one county, the county appearing earliest in the calendar year shall be used to determine the due date of the annual emission fee.

SCHEDULE I Month the Annual Emissions Fee is Due (Accounting Period) Counties in the Monthly Grouping

January	Anderson, Bedford, Benton, Bledsoe, Blount, Bradley and Campbell
February	Cannon, Carroll, Carter, Cheatham, Chester, Claiborne, Clay and Cocke
March	Coffee, Crockett, Cumberland, Davidson, Decatur, DeKalb, Dickson, Dyer and Fayette
April	Fentress, Franklin, Gibson, Giles, Grainger, Greene and Grundy
May	Hamblen, Hamilton, Hancock, Hardeman, Hardin, Hawkins, Haywood and Henderson
June	Henry, Hickman, Houston, Humphreys, Jackson, Jefferson, Johnson, Knox, Lake, Lauderdale, Lawrence and Lewis
July	Lincoln, Loudon, McMinn, McNairy, Macon and Madison
August	Marion, Marshall, Maury, Meigs, Monroe, Montgomery, Moore and Morgan
September	Obion, Overton, Perry, Pickett, Polk, Putnam and Rhea
October	Roane, Robertson, Rutherford, Scott, Sequatchie, Sevier, and Shelby
November	Smith, Stewart, Sullivan, Sumner, Tipton, Trousdale, Unicoi and Union
December	Van Buren, Warren, Washington, Wayne, Weakley, White, Williamson and Wilson

² Note that some sources with allowable emissions below specific thresholds are not subject to the requirement to pay annual emission fees. Contact the Emission Inventory Program at apc.inventory@tn.gov if you have any questions.

Appendix 6: Emission Statement for VOC and NO_x

Not Applicable

Appendix 7: Agreement Letters

Not Applicable

Appendix 8: Example Logs

Example Log for Condition S1-4B

12 Consecutive Month VOC Calculation Table

Month/Year:				Emissions			
[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
Material ID	Material Name	Material Usage (gal/month or lb/mo)	Material Density (lb/gal)	VOC Content (wt% or lb VOC/gal)	VOC (lb/mo)	VOC (ton/mo)	VOC ton/ 12 consecutive mo)
Total							

[6] VOC Emissions (lb/mo) = [3] Material Usage (gal/mo) * [4] Material Density (lb/gal) * [5] VOC Content (wt%), or
 [6] VOC Emissions (lb/mo) = [3] Material Usage (gal/mo) * [5] VOC Content (lb/gal)

[7] VOC Emissions (ton/mo) = [6] VOC Emissions (lb/mo) / 2,000 lb/ton

[8] The tons per 12-consecutive month values are the sum of the emissions in the 11 months preceding the month just completed + the emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this table, this value will be equal to the value for tons per month. For the second month, it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed [i.e., 6 (2) represents 6 tons emitted in 2 months].

Appendix 9: General Provisions for 40 CFR Part 63, Subpart XXXXXX

You are required to comply with the following General Provisions of the federal National Emission Standards for Hazardous Air Pollutants (NESHAP):

General Provisions Citation 40 CFR	Subject of Citation	Applies to Subpart	Explanation
63.1	Applicability	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	§63.11514(g), “Am I subject to this subpart?” exempts affected sources from the obligation to obtain Title V operating permits
63.2	Definitions	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
63.3	Units and Abbreviations	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
63.4	Prohibited Activities and Circumvention	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
63.5	Preconstruction Review and Notification Requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Construction/reconstruction
63.6(a), (b), (c)	Compliance with Standards and Maintenance Requirements—Applicability Compliance Dates	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	63.6(a), (b)(1)-(b)(5), (c)(1), (c)(2), (c)(5)
63.6(e)	Operation and Maintenance Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
63.6(f), (g), (i), (j)	Compliance with Non-opacity Emission Standards	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	63.6(g), (i), (j)
63.7(a), (e), (f), (g), (h)	Performance Testing Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
63.8	Monitoring Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
63.9	Notification Requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	63.9(a)-(d)
63.10	Recordkeeping and Reporting Requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	63.10(a), (b) except for (b)(2), (d)(1), (d)(4)
63.11	Control Device Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
63.12	State Authorities and Delegations	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
63.13	Addresses	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
63.14	Incorporations by Reference	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
63.15	Availability of Information and Confidentiality	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
63.16	Performance Track Provisions	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	