

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



Permit to Construct or Modify an Air Contaminant Source Issued Pursuant to Tennessee Air Quality Act

Date Issued: March 14, 2018

Permit Number:  
973271

Date Amended: October 12, 2018 [Amendment #1]

Date Expires: March 14, 2020

Issued To:  
ABB Installation Products Inc.

Installation Address:  
260 Dennis Street  
Athens

Installation Description:  
Electroplating Machine zinc coating and chromium conversion  
with a Wet Packed-Bed Scrubber Control

Emission Source Reference No.  
54-0047-14  
NESHAP (Subpart WWWWWW)

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).

**CONDITIONS:**

1. The application that was utilized in the preparation of this permit is dated September 28, 2017 with additional information dated November 21, 2017, and signed by Chuck Gilreath, Plant Manager of 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. TAPCR 1200-03-09-.03(8)

(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.

**POST AT INSTALLATION ADDRESS**

2. This source shall be operated in compliance with all applicable requirements of 40 CFR Part 63, Subpart WWWW (6W) – National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, including, but not limited to, **Conditions 3** through **7**. TAPCR 1200-03-09-.03(8)
3. Pursuant to 40 CFR §63.11507(g), the permittee of an affected existing plating and polishing process unit that contains, applies, or emits one or more of the plating and polishing metal HAPs, applicable management practices listed in paragraphs (a) through (l) of this condition, must be implemented as practicable. TAPCR 1200-03-09-.03(8)
  - (a) Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.
  - (b) Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable.
  - (c) Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable.
  - (d) Use tank covers, if already owned and available at the facility, whenever practicable.
  - (e) Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).
  - (f) Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.
  - (g) Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable.
  - (h) Maintain quality control of chemicals all bath ingredient concentrations in the tanks, as practicable.
  - (i) Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.
  - (j) Minimize spills and overflow of tanks, as practicable.
  - (k) Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.
  - (l) Perform regular inspections to identify leaks and other opportunities for pollution prevention.
4. Pursuant to 40 CFR §63.11508(b), the permittee must be in compliance with the applicable management practices and equipment standards in 40 CFR Part 63 Subpart 6W at all times. TAPCR 1200-03-09-.03(8)
5. Pursuant to 40 CFR §63.11508(d), in order to demonstrate continuous compliance with the applicable management practices and equipment standards, specified in 40 CFR Part 63 Subpart 6W, the permittee must satisfy the requirements specified in paragraphs (a) through (d) of this condition. TAPCR 1200-03-09-.03(8)
  - (a) The air pollution control equipment must be maintained and in operation during the operation of the affected source;
  - (b) The permittee must prepare an annual compliance certification according to the requirements specified in §63.11509(c), “Notification, Reporting, and Recordkeeping,” and kept it in a readily-accessible location for inspector review.
  - (c) The permittee must demonstrate continuous compliance with the applicable management practices stated in **Condition 3** according to provisions (i) and (ii).
    - (i) The permittee must implement the applicable management practices during all times that the affected tank or process is in operation.
    - (ii) The permittee must state in the annual compliance certification that the applicable management practices have been implemented, as practicable.

6. Pursuant to 40 CFR §63.11509(e), the permittee must keep the records specified in paragraphs (a) through (c) of this condition. TAPCR 1200-03-09-.03(8)
- (a) A copy of any Initial Notification and Notification of Compliance Status that was submitted and all documentation supporting those notifications.
  - (b) The records specified in 40 CFR §63.10(b)(2)(i) through (iii) and (xiv) of the General Provisions of 40 CFR Part 63.
  - (c) The records required to show continuous compliance with each management practice and equipment standard that applies, as specified in 40 CFR §63.11508(d).
7. Pursuant to 40 CFR §63.10(b)(1), the permittee of an affected source subject to the provisions of 40 CFR Part 63 shall maintain files of all information (including all reports and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche. TAPCR 1200-03-09-.03(8) and TAPCR 1200-03-10-.02(2)(a)
8. Particulate matter (PM) emitted from this source shall not exceed 0.00835 pounds per hour (lb/hr) and 0.0366 tons per year. TAPCR 1200-03-07-.01(5) and the agreement letter dated February 14, 2018

**Compliance Method:** Compliance with this limit shall be assured by daily inspection and recordkeeping in a log of scrubber operation, and scrubbing liquid flow rate (gallons per minute) when this source is in operation. The minimum scrubber liquid flow rate shall be determined according to the requirements of **condition 9**. Upon determination, this parametric monitoring value shall be added to this permit by an amendment. For daily logs, all data shall be recorded in the log within seven (7) days of the end of the day for which the data is required. These records must be retained for a period of not less than five (5) years. An example log has been provided for use after this source has been started up. TAPCR 1200-03-10-.02(2)(a)

Month:                      Year:

Day	scrubbing liquid flow rate (gallons per minute)	Is the source in operation (yes or no)?

9. For the packed bed scrubber controlling this source, the permittee shall begin to measure and record the scrubber liquid flow rate within sixty (60) days of source start-up. Sixty (60) days of liquid flow rates (gallons per minute) for the scrubber shall be compiled. One reading per day of the scrubber liquid flow rate shall be recorded. Any relevant scrubber conditions/problems/concerns shall be noted when recording the values. This data shall be submitted to the Division at one of the addresses in **condition 17**, along with a proposed minimum liquid flow rate for the scrubber, by no later than thirty (30) days after the sixty (60) days of readings are completed. TAPCR 1200-03-10-.02(2)(a)
10. 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 five (5) years. TAPCR 1200-03-10-.02(2)(a)

11. Visible emissions from this source not covered by **Condition 12** shall not exceed twenty percent (20%) opacity, except for one (1) six-minute period in any one (1) hour period and for no more than four (4) six-minute periods in any twenty-four (24) hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average). TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.01(1)
12. 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 1200-03-20. 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.
13. This permit is valid only at this location. TAPCR 1200-03-09-.03(6)
14. This source shall comply with all applicable state and federal air pollution regulations. This includes, but is not limited to, federal regulations published under 40 CFR 63 for sources of hazardous air pollutants and 40 CFR 60, New Source Performance Standards. TAPCR 1200-03-09-.03(8)
15. This source shall operate in accordance with the terms of this permit and the information submitted in the approved permit application. TAPCR 1200-03-09-.01(1)(d) and the application dated September 28, 2017.
16. The issuance of this construction permit supersedes all previously issued permit(s) for this air contaminant source. TAPCR 1200-03-09-.03(8)
17. The permittee shall apply for an operating permit not less than thirty (30) days of initial start-up of this emission source. If construction of the source cannot be completed and an operating permit application filed with the Technical Secretary by the expiration date of this permit, a permit extension request must be submitted in writing at least thirty (30) days prior to the permit expiration date. The application shall be submitted to one of the following addresses:

Tennessee Division of Air Pollution Control  
 William R. Snodgrass Tennessee Tower  
 312 Rosa L. Parks Avenue, 15<sup>th</sup> Floor  
 Nashville, TN 37243

**OR**

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

TAPCR 1200-03-09-.02(1) and (3)

18. This permit shall serve as a temporary operating permit from the date of issuance to the receipt of a standard operating permit provided that an operating permit application is filed in a timely manner as required by **Condition 17**.

TAPCR 1200-03-09-.02(2)

19. This permit is not transferable from one air contaminant source to another air contaminant source nor from one location to another location.

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

20. In the event an ownership change occurs at this facility, written notification of the ownership change requesting a permit amendment must be submitted to the Technical Secretary no later than thirty (30) days after the change occurs. This notification must include an agreement to abide by the terms of the permit, Division 1200-03 and Division 0400-30 of the Tennessee Comprehensive Rules and Regulations, the Tennessee Air Quality Act, and any documented agreements made by the previous owner to the Technical Secretary.

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

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

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

22. The permittee shall certify the start-up date of the air contaminant source regulated by this permit by submitting **A COPY OF THE FIRST PAGE OF THIS PERMIT,** with the information required in A) and B) of this condition completed, to the Technical Secretary's representatives listed below:

A) DATE OF START-UP: \_\_\_\_ / \_\_\_\_ / \_\_\_\_  
month day year

B) Anticipated operating rate: \_\_\_\_ percent of maximum rated capacity

For the purpose of complying with this condition, "start-up" of the air contaminant source shall be the date of the setting in operation of the source for the production of product for sale or use as raw materials or steam or heat production.

The undersigned represents that they have the full authority to represent and bind the permittee in environmental permitting affairs. The undersigned further represents that the above provided information is true to the best of their knowledge and belief.

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

Note: This certification is not an application for an operating permit. At a minimum, the appropriate application form(s) must be submitted requesting an operating permit. The application must be submitted in accordance with the requirements of this permit.

The completed certification shall be delivered to the Permit Program at the address listed below, no later than thirty (30) days after the air contaminant source is started-up.

Division of Air Pollution Control  
Tennessee Permit Program  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 15<sup>th</sup> Floor  
Nashville, TN 37243

An electronic copy (PDF) of start-up can also be submitted to both of the following email address:

[Air.Pollution.Control@tn.gov](mailto:Air.Pollution.Control@tn.gov)  
TAPCR 1200-03-09-.02(3)(a)

(end of conditions)

The permit application gives the location of this source as 35.457389 Latitude and -84.604261 Longitude.

Amendment #1: The purpose of this amendment is to change the name of the permittee. Several conditions were also updated with new regulatory citations and some permitting language was updated.