

From: [Air.Pollution Control](#)
To: [APC Permitting](#)
Subject: FW: Draft Permit Follow up - ABB Installation Products Inc. (54-0047/981278)
Date: Thursday, August 24, 2023 2:38:13 PM
Attachments: [image001.png](#)
[image002.png](#)
[ABB Installation Products Agreement Letter for Source #14 & #16.pdf](#)
[ABB Tank Scehdule for Source #14 & #16.pdf](#)
[image003.png](#)

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Donna F. Brown | Administrative Services Assistant
Air Pollution Control
William R. Snodgrass Tennessee Tower/15th Floor
312 Rosa L Parks Avenue
Nashville, Tennessee 37243
p. 615-532-0532
Donna.f.brown@tn.gov

From: Joshua Rhoads <Joshua.Rhoads@tn.gov>
Sent: Thursday, August 24, 2023 2:25 PM
To: Air.Pollution Control <Air.Pollution.Control@tn.gov>
Subject: FW: Draft Permit Follow up - ABB Installation Products Inc. (54-0047/981278)

Good afternoon,

When you have the opportunity, please upload this agreement letter (first attachment) for ABB Installation Products Inc. (54-0047/981278).

Thank you,
Joshua Rhoads



Joshua Rhoads | Environmental Protection Specialist 2
Air Pollution Control
Tennessee Tower, 15th Floor
312 Rosa L Parks Ave., Nashville, TN 37243
p. 615-532-0547
Joshua.Rhoads@tn.gov

<https://www.tn.gov/environment/program-areas/apc-air-pollution-control-home.html>

From: Lisa A. Woods-Neisler <lisa.neisler@us.abb.com>

Sent: Thursday, August 24, 2023 8:15 AM

To: Joshua Rhoads <Joshua.Rhoads@tn.gov>; Tyler Nash <tyler.nash@us.abb.com>

Cc: Shane S. Sparks <shane.sparks@us.abb.com>; Maggie Strom <mstrom@tiogaenv.com>

Subject: [EXTERNAL] RE: Draft Permit Follow up - ABB Installation Products Inc. (54-0047/981278)

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

Mr. Rhoads,

Please issue the construction permit with the following conditions, as stated below:

1. As per our conversation and email response below, revise the permit to allow the use of sulfuric acid or HCl solution, so there is flexibility to run either and maintain production without applying for a new modification to Source #14 and Source #16.
2. There are 2 chromate conversion coating tanks for each source (#14 & #16): Page #44 is attached with the tanks for each trivalent chromium conversion coating highlighted in yellow. Source #14 would be tanks 14A & 14B. Source #16 would be tanks 15A & 15B.

Please see the attached agreement letter for PM emissions for Source #14 and Source #16, dated August 22, 2023.

Thank you,



—
Lisa Neisler

Environmental Engineer

ABB Installation Products Inc.

260 Dennis St

37303

Phone: 423-745-6588 ext. 7207

E-mail: lisa.neisler@us.abb.com

abb.com

From: Joshua Rhoads <Joshua.Rhoads@tn.gov>

Sent: Tuesday, August 22, 2023 6:16 PM

To: Lisa A. Woods-Neisler <lisa.neisler@us.abb.com>; Tyler Nash <tyler.nash@us.abb.com>

Cc: Shane S. Sparks <shane.sparks@us.abb.com>

Subject: Draft Permit Follow up - ABB Installation Products Inc. (54-0047/981278)

Good Afternoon,

Thank you for contacting me regarding the permit draft. Hopefully, the following will answer the questions we discussed over the phone:

Regarding the use of sulfuric acid, we can revise the acid dip tank description to allow for the use of a sulfuric acid or HCl solution. The conditions of the permit wouldn't change, so reverting back to sulfuric acid would still require the daily HCl log. You would just indicate the concentration of HCl was 0% when sulfuric acid is used. However, the HCl condition could be removed if operation never meets the definition of startup using HCl. If the HCl operation starts up before ABB decides to revert to sulfuric acid, ABB would need to apply for a modification to remove the HCl conditions.

Regarding the request for an agreement letter submission extension, the Division must issue the construction permit on Friday, August 25, 2023. If the agreement letters can't be submitted before August 25, 2023, the Division would issue the construction permit with allowable particulate matter emission limits based on 0.02 grains per dry standard cubic foot of exhaust gas (Source 14: 15.32 lbs/hr and Source 16: 19.57 lbs/hr). These limits would be the basis for your annual emission fees.

Thank you,
Joshua Rhoads



Joshua Rhoads | Environmental Protection Specialist 2

Air Pollution Control

Tennessee Tower, 15th Floor

312 Rosa L Parks Ave., Nashville, TN 37243

p. 615-532-0547

Joshua.Rhoads@tn.gov

<https://www.tn.gov/environment/program-areas/apc-air-pollution-control-home.html>

August 22, 2023

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

RE: Permit Agreement Letter
ABB Installation Products, Inc.
260 Dennis Street, Athens, Tennessee 37003
Emission Source Reference No. APC Facility ID # 54-0047, Source #s 14 & 16 /
Permit No. 981278

Dear Technical Secretary:

On behalf of ABB Installation Products, Inc., the following limitations are agreed upon for the above referenced facility:

For Emission Source #14

- The proposed volume throughput through the electroplater is 15 loads per hour with each load weighing 720 pounds, for a total of 10,800 pounds per hour.
- Based upon calculations using EPA AP-42 emission factors, we have determined that PM emissions emitted by the facility by this Emission Source shall not exceed 0.00835 pounds per hour (daily average), and 0.0366 tons per 12 consecutive months.

ABB Installation Products, Inc., shall assure compliance with these limitations by operating each wet packed-bed scrubber associated with this source in accordance with the manufacturer specifications of a minimum liquid flow rate of 60 gallons/minute for both scrubber #1 and #2.

For Emission Source #16

- The proposed volume throughput through the electroplater is 15 loads per hour with each load weighing 720 pounds, for a total of 10,800 pounds per hour.
- Based upon calculations using EPA AP-42 emission factors, we have determined that PM emissions emitted by the facility by this Emission Source shall not exceed 0.0075 pounds per hour (daily average), and 0.033 tons per 12 consecutive months.

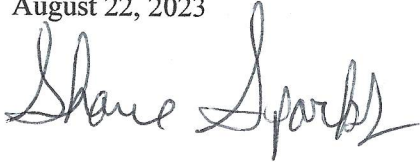
ABB Installation Products, Inc., shall assure compliance with these limitations by operating each wet packed-bed scrubber associated with this source in accordance with the manufacturer specifications of a minimum liquid flow rate of 30 gallons/minute for scrubber #1 and 180 gallons/minute for scrubber #2.

Should you have any questions or require additional information, please contact Shane Sparks via phone at (423)745-6588 or via e-mail at shane.sparks@us.abb.com.

On behalf of ABB Installation Products, Inc., I agree to the above limitations. I am authorized to represent and bind the facility in environmental affairs.

Sincerely,

Shane Sparks
Plant Manager
August 22, 2023

A handwritten signature in cursive script that reads "Shane Sparks". The signature is written in dark ink and is positioned below the typed name and title.

