

Justin Dolzen

From: Justin Dolzen
Sent: Wednesday, June 16, 2021 3:20 PM
To: Brandon Tate
Cc: Ronald Tate
Subject: RE: 74-0087/978595 *Incomplete permit application*

Brandon,

Given the circumstances, an extension to July 30, 2021 can be granted.

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

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From: Brandon Tate <btate@tatefabricating.com>
Sent: Tuesday, June 8, 2021 1:57 PM
To: Justin Dolzen <Justin.Dolzen@tn.gov>; Air.Pollution Control <Air.Pollution.Control@tn.gov>
Cc: Ronald Tate <rtate@tatefabricating.com>
Subject: [EXTERNAL] Re: 74-0087/978595 *Incomplete permit application*

Justin,

Tate Fabricating Company, Incorporated is requesting an extension to July 30, 2021 to respond to your questions which were summarized in the letter dated May 21, 2021 from James P. Johnston, P.E., Deputy Director of Permitting & Regulatory Development for the State of Tennessee Department of Environment and Conservation (Certified Article Number 9414 7266 9904 2170 0975 57).

As an update, Tate is still attempting to gather the needed information regarding the Blast Conveyor System (aka Wheelabrator). The literature available in Tate's archive includes the schematics for the machine but does not provide sufficient detail to extract the answers to your specific questions. To further add to the

challenge, it appears the machine was provided by Equipment Technologies, a Stone Mountain, Georgia company that is no longer in business. Without the manufacturer as a source, it has been a difficult challenge to reply. The design of Tate 's machine (e.g. Equipment Technologies Mark V-P, Serial No. 02400) appears similar to the Wheelabrator Pre-Blast Roll Conveyor Model 2436; however, the Wheelabrator representative stated they were reluctant to provide values for that machine's performance as a comparable without first examining Tate's machine.

I have attempted to schedule Wheelabrator on multiple times since April to make a site visit to assess the machine and provide some insight. Their schedule has been extremely busy, and they have been unable to commit until today. A Wheelabrator representative has now scheduled a date to assess Tate's machine on June 22nd. Upon completion of that assessment, the Wheelabrator representative asserts he should be able to gather the needed information to assist Tate in responding to your questions.

Based upon this timeline, which is beyond the control of Tate, Tate will be unable to respond within the 30-day window stipulated within the letter received.

Thank you in advance for your consideration.

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

From: Brandon Tate <btate@tatefabricating.com>
Sent: Thursday, May 20, 2021 10:49 AM
To: Justin Dolzen <Justin.Dolzen@tn.gov>; Ronald Tate <rtate@tatefabricating.com>
Subject: Re: 74-0087/978595 *Incomplete permit application*

I am gathering that information for you. I should be able to complete the request next week.

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

From: Justin Dolzen <Justin.Dolzen@tn.gov>
Sent: Wednesday, May 19, 2021 12:13 PM
To: Brandon Tate <btate@tatefabricating.com>; Ronald Tate <rtate@tatefabricating.com>
Subject: RE: 74-0087/978595 *Incomplete permit application*

Hi Brandon,

Just wanting to follow up on this. Have you been able to find that information on the wheelabrator?

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

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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*

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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

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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
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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

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Nashville, TN 37243

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