

**STATEMENT OF BASIS**  
**AMERICAN BUILDINGS COMPANY (ABC)**  
**Facility Number 601-0019**  
**EUFAULA, ALABAMA**

On May 4, 2016, the above existing facility submitted a major source operating permit renewal application (Title V) for their existing metal building manufacturing operation. Currently this facility is operating under a Title V MSOP that expired on November 5, 2016. The only change to this permit is the due date for the quarterly reports was changed from the 10<sup>th</sup> to the 15<sup>th</sup>.

**OPERATION:**

American Buildings Company (ABC) is an existing metal prefabricated building manufacturer with a SIC code of 3448 and operates 7200 hours per year. The metal buildings are composed of primary and secondary steel frame components, roof and wall panels and various other ancillary components. Each of these types of components is manufactured in a production line located in a specific section of the facility. There are four main manufacturing processes: 1. Rigid Frame Coating, 2. End wall Coating, 3. Purlin Roll Forming, and 4. Panel Production.

**Rigid frame coating (RF-7):** The fabricated metal beams and associated components are coated (primer) manually using airless spray guns. A small amount of touchup painting is done as needed on pre-coated components. A local exhaust system that includes particulate filters exhausts the bay to four stacks designated EP-3, EP-4, EP-5 and EP-6 on the building roof. Beams and parts are allowed to dry at room temperature in the same bay where the coatings are applied.

**End wall coating (EW-6):** The fabricated metal beams and associated components are coated (primer) manually using an airless spray gun. A small amount of touchup painting is done as needed on pre-coated components. A local exhaust system that includes particulate filters exhausts the bay to two stacks designated on the building roof. Beams and parts are allowed to dry at room temperature in the same bay where the coatings are applied.

**Purlin Roll Forming (PRLN 2):** The plant purchases pre-coated steel coils, which are roll formed and cut to length to make the purlins. ABC no longer paints on this line.

**Panel production PNL 2, 3, 4, and 5:** The sheet metal panel forming operations is where pre-painted metal coil is formed into roof, liner and wall panels in areas. Coil is automatically fed into equipment in which it is cut to length by shears, and formed by roll forming mills or a small air operated press. Coil is lubricated during the forming processes using a vanishing oil (Iloform 7405), which evaporates completely during the process. Sealant (SikaLastomer 501) is applied to certain panel joints in the standing seam line.

**EMISSIONS:**

VOCs are the major pollutants at this facility. The PM-10, VOC and HAP emissions are from the application of coatings (red and gray primer), and the cleanup solvent (721 Solvent Blend) in the production lines. This facility currently limits total VOC (including organic HAPs) emissions from all sources in the plant to 230 tons to avoid PSD. No other criteria air pollutants are emitted in sufficient quantities, actually or potentially, to exceed the major source threshold.

**Emissions:**

Pollutant	Potential (tpy)	Actual (tpy)
VOC	230	30
Xylene	1	0.3
Methyl Alcohol	1	0.5
Total HAPs	2	1.6
PM	14	1

**REQUIREMENT:**

ABC has limited their emissions of VOCs and PM to 230 tons per year to avoid a PSD review. ABC will not be subject to 40 CFR 60 subpart TT New Source Performance Standards for metal coil coating. ABC will not be subject to the NSPS as metal coil is used as a raw material in the facility, only “discrete parts” (panels, rafters, etc.) fabricated from uncoated coil are coated with primer at the facility and therefore does not meet the definition of metal coil coating. ABC will not be subject to 40 CFR 63 subpart M NESHAPS for Surface Coating of Miscellaneous Metal Parts or 40 CFR 63 subpart SSSS NESHAPS for Metal Coil Surface Coating because potential emissions of HAPs do not exceed the 25 tons per for all HAPs and 10 tons per year of any single HAP.

ABC will be subject to the National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63 subpart XXXXXX because the welding rod and steel used at this facility contains chromium, manganese, and nickel. This NESHAP will require ABC to minimize air emissions from welding and machining.

**MONITORING:**

ABC is required to submit quarterly reports by the tenth day of the month following the end of the calendar quarter. The quarterly report will include the amount of VOCs and HAPs emitted per calendar month and the rolling twelve month totals of VOCs and HAPs emitted in units of pounds and tons. ABC will also be required to maintain on site records that include the type and quantity of VOC containing material as well as a complete inventories of VOC and HAP containing materials used in the plant’s manufacturing processes.

CAM will not be applicable as ABC has no pollution control devices. Subpart XXXXXX will require ABC to monitor the visual emissions from welding and machining.

**RECOMMENDATION:**

Based on the above analysis, I recommend that American Building Company be issued a renewal Major Source Operating Permit for their metal building fabrication operations with the attached provisos. The permit will consist of four units: (1) Rigid Frame Coating, (2) End Wall Coating, (3) Panel Production, and (4) Welding and Machining.

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Hal Brock  
Chemical Branch  
Air Division

December 2, 2016  
Date