

Statement of Basis for Qualico Steel Company, Inc.
Facility Number 607-0027

Introduction

Qualico Steel is an existing major source for emissions of Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs). The company currently has a Major Source Operating Permit (MSOP) that expires on February 20, 2022. The Air Division facility number for Qualico is 607-0027. On August 19, 2021, Qualico Steel Company submitted a Title V renewal application for the fabrication and coating of structural steel. The facility is located in Webb.

The company normally operates ten hours each day, five days each week, and 50 weeks each year. Steel is fabricated by cutting, welding, grinding, drilling, and other processes. Emissions from these processes are fugitive and not significant. After fabrication, the steel is shot blasted prior to being painted. The company has five shot blasting machines.

Coating operations occur in a large bay in the facility after the structural steel has been shot blasted. Coating the structural steel is accomplished with the use of a paint spray systems. Houston County is currently listed in attainment with all National Ambient Air Quality Standards (NAAQS). There are no ongoing enforcement actions against Qualico necessitating additional requirements to achieve compliance with permit conditions.

Emissions

Pollutant	Actual Emissions (tpy)	Potential Emissions (tpy)
VOC	12	235
HAPS	6	95
Xylene	6	62
PM	0.3	35

Qualico has no significant sources of greenhouse gasses. Qualico has five shot blast machines that use baghouses to control particulate emissions. The proposed permit requires daily visual monitoring of these units. Qualico also has three plasma tables with baghouses. Monitoring is not required for these units because they are not considered to be significant sources of particulate. Qualico has used outside sandblasting in the past, but not recently.

Regulations

Coating Operations:

This facility currently limits their facility wide VOC emissions to 235 tons per year, which is below the PSD thresholds. No New Source Performance Standards (NSPS) apply to this facility. Qualico is subject to 40 CFR 63 Subpart M, National Emissions Standards for Hazardous Air Pollutants: Surface Coating Miscellaneous Metal Parts and Products.

Shot Blast Fabrication Operations:

CAM will not be applicable as the potential uncontrolled emissions from the shot blast operations are less than 100 tons per year.

Welding:

The welding at Qualico is not subject to 40 CFR 63 Subpart XXXXXX, the National Emission Standards for Hazardous Air Pollutants area source standards for nine metal fabrication and finishing source categories, because this facility is a major source of HAP. This federal standard has not been adopted by ADEM.

Monitoring of Emissions

Coating Operations:

Qualico is subject to the monitoring and reporting requirements listed in 40 CFR 63 Subpart M. Emissions of VOCs and HAPs will be determined from material usage. These will be submitted in quarterly reports and as required by 40 CFR 63 Subpart M.

Shot Blast:

Qualico is required to visually observe the baghouse at least once daily for visible emissions and be inspected for proper operation at least annually and whenever observed emissions are greater than normal. Qualico is also required to maintain a daily logbook of visible emissions from all baghouses associated with shot blast machines.

Permitting Fees

Title V major sources are subject to operating permit fees which charge the facility a yearly amount based on the actual emission rate of pollutants for the previous year.

Affected States Notification

Notification of this major source operating permit will be sent to all affected states bordering Alabama.

Environmental Justice

ADEM utilized EPA's EJSCREEN screening tool to help identify areas that may warrant additional consideration, analysis, or outreach (see EJSCREEN Report).

Recommendation

Based on the above information, I recommend that the Major Source Operating Permit (MSOP) 607-0027 be renewed.

Hal Brock

Hal Brock
Chemical Branch
Air Division

December 13, 2021
Date



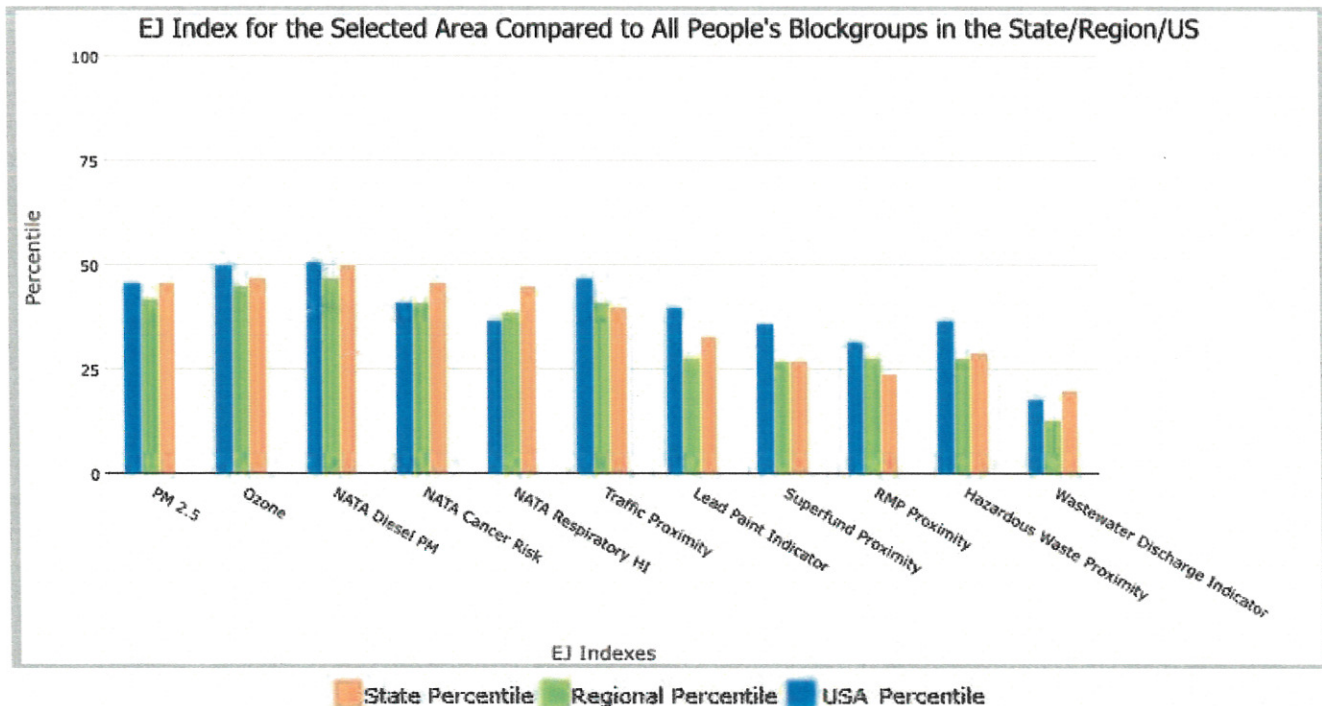
3 miles Ring Centered at 31.259152,-85.279053, ALABAMA, EPA Region 4

Approximate Population: 2,431

Input Area (sq. miles): 28.27

Qualico

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	46	42	46
EJ Index for Ozone	47	45	50
EJ Index for NATA* Diesel PM	50	47	51
EJ Index for NATA* Air Toxics Cancer Risk	46	41	41
EJ Index for NATA* Respiratory Hazard Index	45	39	37
EJ Index for Traffic Proximity and Volume	40	41	47
EJ Index for Lead Paint Indicator	33	28	40
EJ Index for Superfund Proximity	27	27	36
EJ Index for RMP Proximity	24	28	32
EJ Index for Hazardous Waste Proximity	29	28	37
EJ Index for Wastewater Discharge Indicator	20	13	18



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

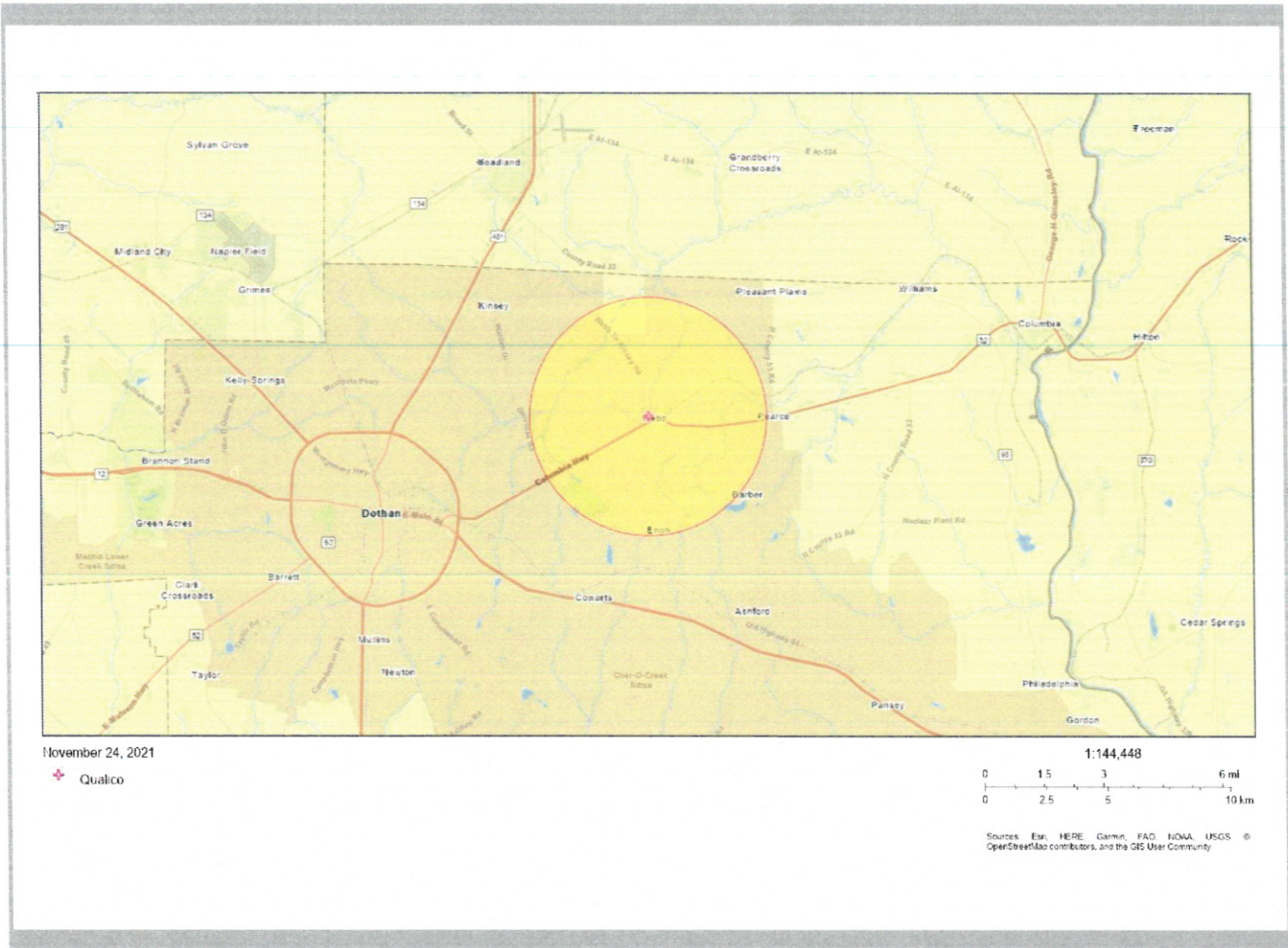


3 miles Ring Centered at 31.259152,-85.279053, ALABAMA, EPA Region 4

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Qualico



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	1



EJSCREEN Report (Version 2020)



3 miles Ring Centered at 31.259152,-85.279053, ALABAMA, EPA Region 4

Approximate Population: 2,431

Input Area (sq. miles): 28.27

Qualico

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	9.2	9.31	51	8.57	81	8.55	71
Ozone (ppb)	33.9	38	4	38	21	42.9	7
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.169	0.346	13	0.417	<50th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	41	43	36	36	80-90th	32	80-90th
NATA* Respiratory Hazard Index	0.66	0.65	45	0.52	90-95th	0.44	90-95th
Traffic Proximity and Volume (daily traffic count/distance to road)	29	220	34	350	26	750	18
Lead Paint Indicator (% Pre-1960 Housing)	0.13	0.18	54	0.15	63	0.28	43
Superfund Proximity (site count/km distance)	0.073	0.054	80	0.083	70	0.13	55
RMP Proximity (facility count/km distance)	0.35	0.41	71	0.6	59	0.74	52
Hazardous Waste Proximity (facility count/km distance)	0.65	0.82	59	0.91	62	5	42
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0021	1.2	66	0.65	79	9.4	70
Demographic Indicators							
Demographic Index	29%	36%	46	37%	42	36%	48
People of Color Population	19%	34%	39	39%	33	39%	35
Low Income Population	39%	38%	53	36%	57	33%	66
Linguistically Isolated Population	1%	1%	73	3%	53	4%	46
Population With Less Than High School Education	18%	14%	66	13%	71	13%	74
Population Under 5 years of age	5%	6%	38	6%	38	6%	36
Population over 64 years of age	19%	16%	70	17%	70	15%	73

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.