

Statement of Basis

Allied Steel Corporation
Mobile County
Facility Number 503-6008

This is a proposed renewal of an existing Title V Major Source Operating Permit. The original permit was issued on January 16, 2002, and expired on January 15, 2007. The current permit expires on January 15, 2017.

Allied Steel Corporation operates a steel piling supply business in Saraland, Mobile County, Alabama. Pilings are used to construct docks and other structures along water fronts and other areas where a heavy load must be supported by soft soil.

Allied Steel Corporation is a major source of volatile organic compounds (VOC), and hazardous air pollutants (HAPS). There have been no changes in the operation of this facility. Sandblasting was added to this draft permit. The wording of some of the permit provisos was changed to improve the permit, however, there were no change to the limits or applicable regulations.

The following is a summary of the sources, regulations, and periodic monitoring.

Two outside surface spraying operations

Allied Steel's SIC Code is 3441 for fabricated structural metal coating. The facility operates a single shift, five days a week for approximately 2040 hours a year fabricating water front pilings. The pilings are composed of flat sheets, H sheets and piping which are welded and painted. The pilings and parts are first sandblasted and afterward they are coated (painted). The painting is a black coal tar epoxy and is applied 5 ft above the mud line. Compressed air for the painting and sandblasting is provided by electric or portable diesel air compressors. Their painting operation is done outside with spray guns. The paints are in five gallons containers and the cleanup solvent are stored in tote bins. All of the VOC and HAPS emissions are fugitive.

VOC emissions are limited to 200 tons in any twelve month period to avoid PSD. The painting operations are subject to the MACT found in 40 CFR Part 63, Subpart M. Air emissions are reported quarterly.

Pollutants	Limitation	Regulations	Monitoring
VOC	200 TPY	ADEM Code 335-3-14-.04	Quarterly report
HAPS	2.6 lb./gal. coating solids	40 CFR Part 63, Subpart M	Quarterly report

Sources subject only to General Provisos

Sandblasting is subject only to the General Provisos.

Hal Brock
Industrial Chemicals Section
Air Division

November 9, 2016