

Statement of Basis  
Allied Steel Corporation  
(Steel Fabrication and Painting)  
Mobile County  
Facility Number 503-6008

**Introduction**

This is a proposed renewal of an existing Title V Major Source Operating Permit (MSOP). The original MSOP was issued on January 16, 2002. The current permit expires January 15, 2022.

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 (HAP).

There are no current or ongoing enforcement actions against Allied Steel Corporation necessitating additional requirements to achieve compliance with permit conditions. Mobile County is currently listed in attainment with all National Ambient Air Quality Standards (NAAQS).

**Requested Changes**

Allied Steel received an air permit on DATE to install a shot blast line to reduce the amount of sandblasting done on site. This Air Permit will be incorporated into the MSOP during this renewal (is this correct?)

The wording of some of the permit provisos was changed to improve the permit. However, there were no changes to the limits or applicable regulations.

**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 waterfront pilings. The pilings are composed of flat sheets, H sheets and piping, which are welded and painted. The pilings and parts are prepared by sandblasting or shot blasting before being painted. The paint, often a black coal tar epoxy, 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 is stored in tote bins. All of the VOC and HAP 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 to the Department on a quarterly basis.

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

### **Sand Blasting**

Sandblasting is subject only to the General Provisos. Particulate emissions are estimated annually for Title V fees.

### **Shotblasting**

A shot blasting machine with baghouse is used to prepare the surface of small pieces for painting. This unit is subject to the opacity standards of ADEM Code R. 335-3-4-.01 and the PM process weight limits of ADEM Code R. 335-3-4-.04.

### **Monitoring of Emissions**

Allied Steel maintains records of monthly coating usage and utilizes calculations to show compliance with their VOC limit and 40 CFR 63, Subpart M. These results are reported quarterly to the Department.

The shot blast machine with baghouse is subject to opacity and process weight limits INSERT the ADEM codes. Compliance with the opacity standard is recorded weekly.

### **Permitting Fees**

Title V major sources are subject to operating permit fees which charge the facility annually based on the actual emissions of air 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).

### **Recommendations**

I recommend that the attached permit be issued to Allied Steel.

A handwritten signature in cursive script that reads "Hal Brock". The signature is written in dark ink and is positioned above a horizontal line.

Hal Brock  
Industrial Chemicals Section  
Air Division

October 28, 2021

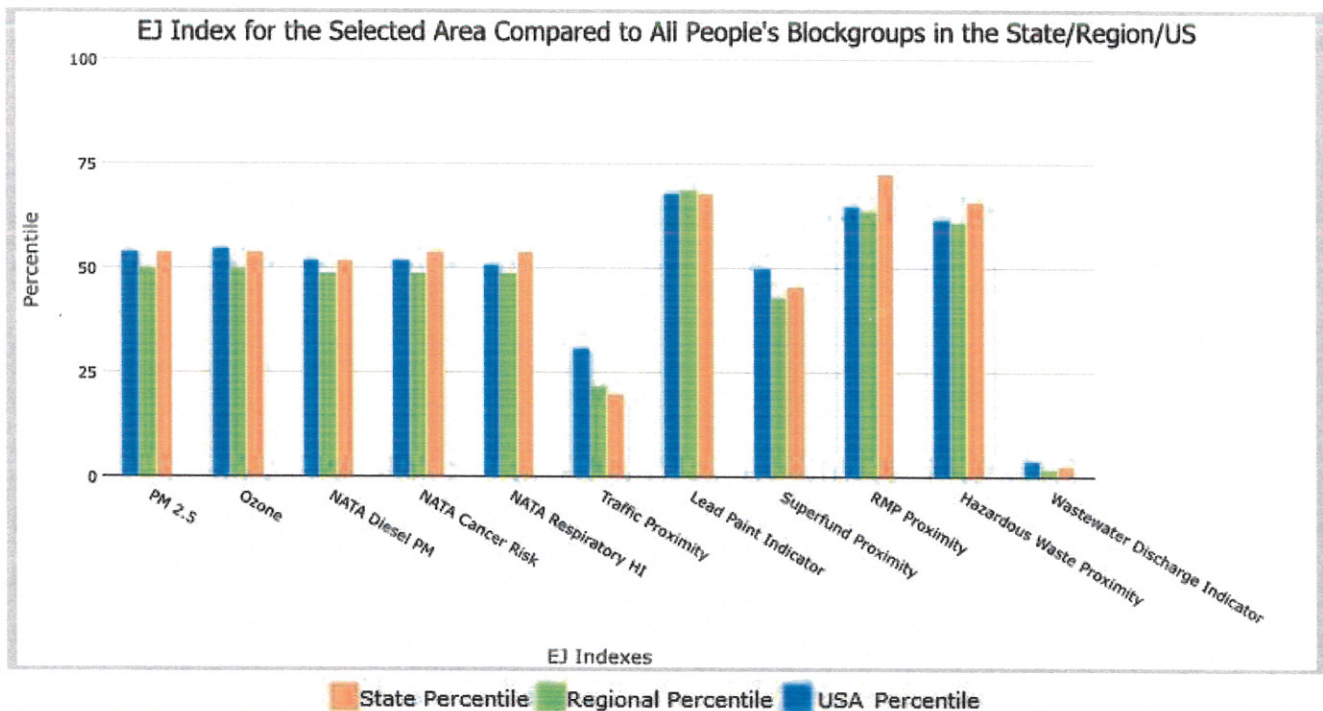


3 miles Ring around the Area, ALABAMA, EPA Region 4

Approximate Population: 14,464

Input Area (sq. miles): 29.75

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
<b>EJ Indexes</b>			
EJ Index for PM2.5	54	50	54
EJ Index for Ozone	54	50	55
EJ Index for NATA* Diesel PM	52	49	52
EJ Index for NATA* Air Toxics Cancer Risk	54	49	52
EJ Index for NATA* Respiratory Hazard Index	54	49	51
EJ Index for Traffic Proximity and Volume	20	22	31
EJ Index for Lead Paint Indicator	68	69	68
EJ Index for Superfund Proximity	46	43	50
EJ Index for RMP Proximity	73	64	65
EJ Index for Hazardous Waste Proximity	66	61	62
EJ Index for Wastewater Discharge Indicator	3	2	4



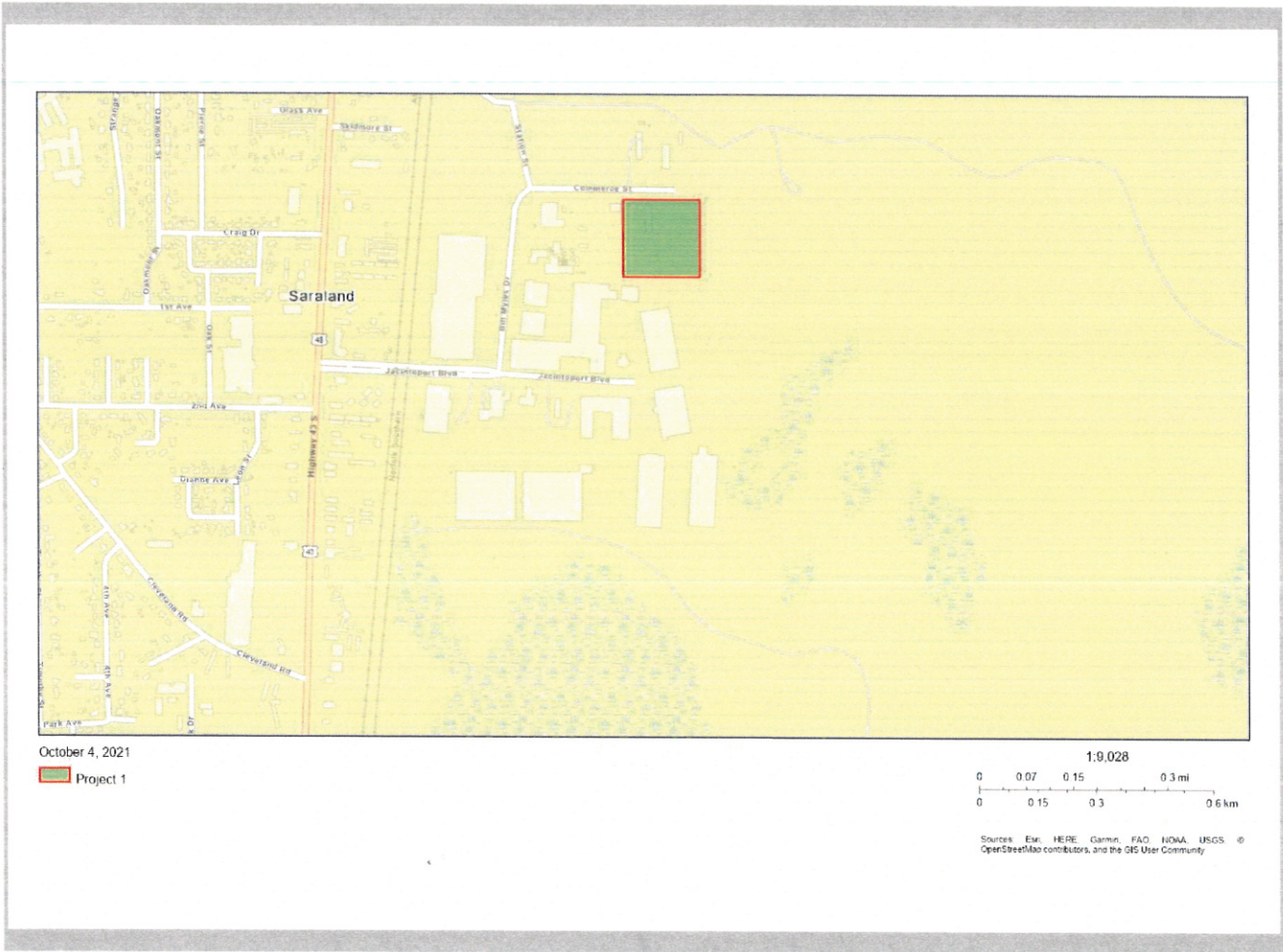
This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective 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 around the Area, ALABAMA, EPA Region 4**

**Approximate Population: 14,464**

**Input Area (sq. miles): 29.75**



<b>Sites reporting to EPA</b>	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	4

## EJSCREEN Report (Version 2020)



3 miles Ring around the Area, ALABAMA, EPA Region 4

Approximate Population: 14,464

Input Area (sq. miles): 29.75

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
<b>Environmental Indicators</b>							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$ )	8.96	9.31	33	8.57	71	8.55	63
Ozone (ppb)	36.5	38	21	38	40	42.9	15
NATA* Diesel PM ( $\mu\text{g}/\text{m}^3$ )	0.421	0.346	73	0.417	60-70th	0.478	50-60th
NATA* Cancer Risk (lifetime risk per million)	44	43	51	36	80-90th	32	90-95th
NATA* Respiratory Hazard Index	0.68	0.65	54	0.52	90-95th	0.44	90-95th
Traffic Proximity and Volume (daily traffic count/distance to road)	320	220	82	350	72	750	58
Lead Paint Indicator (% Pre-1960 Housing)	0.16	0.18	63	0.15	69	0.28	48
Superfund Proximity (site count/km distance)	0.057	0.054	72	0.083	63	0.13	46
RMP Proximity (facility count/km distance)	1	0.41	89	0.6	82	0.74	77
Hazardous Waste Proximity (facility count/km distance)	2.4	0.82	92	0.91	90	5	69
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.27	1.2	93	0.65	95	9.4	92
<b>Demographic Indicators</b>							
Demographic Index	35%	36%	57	37%	53	36%	57
People of Color Population	30%	34%	55	39%	48	39%	49
Low Income Population	41%	38%	56	36%	60	33%	68
Linguistically Isolated Population	1%	1%	73	3%	52	4%	46
Population With Less Than High School Education	17%	14%	64	13%	69	13%	73
Population Under 5 years of age	7%	6%	63	6%	64	6%	61
Population over 64 years of age	15%	16%	46	17%	52	15%	56

\* 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](http://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.