

Statement of Basis
Dunbarton Corporation Rediframe Division
(Metal Painting Line)
Facility Number 607-0032

On August 7, 2020, Dunbarton Corporation submitted a Title V major source permit renewal application for the manufacture and surface coating of metal doors and frames. The Standard Industrial Classification for this work is 3442. There have been no significant changes to the paint line in the last fifteen years. Dunbarton's Rediframe Division is located in Dothan, Alabama.

Dunbarton manufactures steel doors and frames. Steel coils are received and stamped to form the components of the door frame. The components are hung and carried by an overhead chain through a wash line and drying oven before being painted. The paint line has two manual paint booths and three automatic booths with rotary atomizers. An off line paint booth is used for repair work. After painting, the chain goes through a drying oven and on to packaging.

Rediframe has a 245 ton per year volatile organic compound synthetic minor limit to avoid PSD. Hazardous Air Pollutants are limited to 24.9 tons in any twelve-month period, and any single HAP is limited to 9.9 tons in the same period. This facility is not a potential major source of particulate matter, nitrogen oxides, sulfur dioxide, or carbon monoxide. The paint line is the only significant source of air emissions at this facility. Potential emissions from the methane fueled oven are estimated to be 11 tons per year of nitrogen oxides. Actual emissions in 2019 were reported to be 1 ton of NOx, 44 tons of VOC, 8 tons of trimethylbenzene, and 22 tons of all HAP.

Paint Line

The paint line with washer, dryer, paint booth and bake oven is the only pollutant source in this permit. This line is not subject to the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 subpart Mmmm because HAPs are limited below the major source thresholds.

Pollutants	Limitation	Regulations	Monitoring
VOC	245 tons in 12 months	PSD – Synthetic Minor	Recordkeeping and semi-annual reports
HAPs	24.9 tons in 12 months	Major source threshold	Recordkeeping and semi-annual reports
HAP	9.9 tons in 12 months	Major source threshold	Recordkeeping and semi-annual reports

Monitoring of Emissions

Dunbarton will keep records of paint usage along with monthly calculations of air emissions based on the manufactures data sheets for the paints and clean up solvents used. Emissions will be reported to the Department every January and July.

Permitting Fees

Title V major sources are subject to operating permit fees which charge the facility annually based on the actual emissions for the previous year.

Affected States Notification

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

Recommendations

I recommend issuing this permit to Dunbarton if no significant comments are received during the required 30 day public comment period and 45 EPA review.

Hal Brock
Industrial Chemicals Section
Air Division

December 15, 2020

Date