

**STATEMENT OF BASIS  
DUNBARTON CORPORATION (Dothan facility)  
Houston County  
Facility No. 607-0032**

**INTRODUCTION**

Dunbarton has applied for renewal of Major Source Operating Permit (MSOP) No. 607-0032. This proposed Title V MSOP renewal has been developed in accordance with the provisions of ADEM Admin. Code r. 335-3-16. The above-named applicant has requested authorization to perform the work or operate the facility shown on the application and drawings, plans, and other documents attached hereto or on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of the permit.

The facility was originally constructed in 1972. The fourth renewal Title V MSOP was issued on February 9, 2021, with an expiration date of February 8, 2026. The renewal application was received on August 1, 2025. ADEM Admin. Cond r. 335-3-16-12(c) states “If a timely and complete application for a permit renewal is submitted, but the Department fails to take final action to issue or deny the renewal permit before the end of the term of the previous permit, then the permit shall not expire until the renewal permit has been issued or denied and any permit shield granted for the permit shall continue in effect during that time”; therefore, the current MSOP was administratively continued.

The facility is located in Houston County, which is currently in compliance with all National Ambient Air Quality Standards (NAAQS).

There are no current or ongoing enforcement actions against Dunbarton necessitating additional requirements to achieve compliance with the proposed permit conditions. The enforcement and compliance history for the facility can be found at <https://echo.epa.gov/> (Search using Facility ID AL110064869566).

The current MSOP consists of Line #001: Coating Line with washer, dryer, paint booth and bake oven.

No major additions or changes to the current MSOP are occurring during this renewal. Minor changes include updating the general permit provisos to better reflect current Department policies.

**EMISSIONS**

The facility is a major source with respect to Title V for volatile organic compounds (VOCs). No other criteria pollutants are emitted in sufficient quantities, actually or potentially, to exceed the Prevention of Significant Deterioration (PSD) threshold of 250 tons per year.

Dunbarton will maintain their current rolling 12-month emission limitations for Unit 001 of 245 tons of VOC, 24.9 tons of total-hazardous air pollutants (HAPs), and 9.9 tons of any single HAP. 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. There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) or New Source Performance Standards (NSPS) applicable to the operations at Dunbarton.

## **OPERATIONS (Unit No. X001 – Coating Line with Washer, Dryer, Paint Booth and Bake Oven)**

### Overview

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.

This unit currently operates a paint line with washer, dryer, paint booth and bake oven. This line is not subject to the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart Mmmm, because HAPs are limited below the major source thresholds.

Equipment for this process was initially permitted in Air Permit 607-0032-X001 on February 19, 1999. The requirements and limitations from this permit were incorporated into the initial Title V permit on February 9, 2001.

### Emission Standards/Limitations

#### *Opacity and Particulate Matter (PM)*

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

#### *Volatile Organic Compounds (VOCs)*

VOC emissions from this unit are limited to 245 tons during any 12-month rolling period in order to stay below the significant thresholds for PSD. As mentioned above, these limitations were established in Air Permit 607-0032-X001 issued on February 19, 1999, and subsequently incorporated into the Title V permit issued on February 9, 2001.

#### *Hazardous Air Pollutants (HAPs)*

HAP emissions from this unit are limited to 24.9 tons of total-hazardous air pollutants (HAPs), and 9.9 tons of any single HAP. As mentioned above, these limitations were established in Air Permit 607-0032-X001 issued on February 19, 1999, and subsequently incorporated into the Title V permit issued on February 9, 2001.

### Periodic Monitoring

#### *Opacity and PM*

Due to the facility's low potential to emit PM of 0.87 tons per year, no additional monitoring is required for opacity and PM.

*Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)*

Dunbarton is required to track its usage of VOC and HAP containing materials, the percent by weight and volume of VOC and HAP in these materials, and the amount of VOC and HAP emitted by these materials per calendar month.

Reporting Requirements

Emissions of VOCs and HAPs will be determined from material usage assuming worst case scenario and will be submitted to the Department in semi-annual reports every January and July.

Dunbarton will also be required to submit an Annual Compliance Certification report detailing the facility's compliance status with each permit proviso.

**PERMITTING FEES**

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.

**FUGITIVE DUST**

All plant roads are paved or graveled. There are no raw materials, storage piles, products, etc. capable of generating fugitive dust at this facility. Therefore, additional specific requirements for fugitive dust are not necessary.

**RECOMMENDATION**

Based on the above analysis, I recommend that this facility's MSOP be renewed pending the 30-day public notice and EPA's 45-day review.

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Christopher Nuckels  
Chemical Branch  
Air Division

January 27, 2026  
Date

CTN/ctn