STATEMENT OF BASIS

Allied Steel Corporation
Mobile County
Saraland, Alabama
Facility Number 503-6008

Introduction

On August 5, 2026, the Department received the initial Major Source Operating Permit (MSOP) application for Allied Steel Corporation (Allied). This proposed Title V Major Source Operating Permit will be issued under the provisions of ADEM Admin. Code R. 335-3-16. The above-named applicant has requested authorization to continue the work and 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 (ADEM), in accordance with the terms and conditions of this permit. The Standard Industrial Classification (SIC) for manufacturing fabricated structural metal products is 3441. The North American Industry Classification System (NAICS) code for Fabricated Structural Metal Manufacturing is 332312.

Background

Allied operates a steel piling supply business in Saraland, Mobile County, Alabama. The facility operates a single shift, five days a week for approximately 2040 hours a year. 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. This is a proposed renewal of the existing MSOP. The original MSOP was issued on January 16, 2002, and the current MSOP expires on January 15, 2027. Allied is a major source of volatile organic compounds (VOCs), and hazardous air pollutants (HAPs). MSOP 503-6008 limits VOCs to 200 tons in any twelve-month period. No changes have been requested in the limits of this MSOP and no new air sources have been permitted at this facility.

Mobile County is currently listed in attainment with all National Ambient Air Quality Standards (NAAQS).

There are no current or ongoing enforcement actions against Allied 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 AL0000000109706008).

Emission Unit No. 001: Outside surface coating operations

Overview

The facility fabricates waterfront pilings. The pilings are composed of flat sheets, H sheets and piping that 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 five feet 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 HAPS emissions are fugitive.

VOC emissions are limited to 200 tons in any twelve-month period to stay below thresholds for the Prevention of Significant Deterioration (PSD). The painting operations are subject to 40 CFR Part 63, Subpart MMMM. Air emissions are reported quarterly.

Emissions Standards

Volatile Organic Compounds

Emissions of VOCs from all operations at this facility including, but not limited to, coating, storage, cleanup, etc., shall not exceed 200 tons in any consecutive rolling 12-month period based on the premise that all VOCs applied are emitted. This requirement was included in the Title V Permit during the initial issuance issued January 16, 2002, under Alabama Admin. Code R. 335-3-16-.01(1)(i) & 335-3-16-.06(1) and guidance from EPA found in 57 Federal Register 32250, 32279 (July 21, 1992) which states, "Title V permits are an appropriate means by which a source can assume a voluntary limit on emissions for purposes of avoiding being subject to more stringent requirements."

Hazardous Air Pollutants

This source is subject to 40 CFR 63 subpart MMMM, the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This federal standard has been adopted as ADEM Admin. Code R. 335-3-11-.06(90). HAP emissions are limited to 2.6 pounds per gallon. The facility meets this standard by using compliant coatings.

Monitoring

The VOC content by weight of each VOC containing material shall be determined using Reference Method 24 in Appendix A of 40 CFR Part 60. Vendor data based on this Method is an appropriate substitute.

The HAP content by weight of each HAP containing material shall be determined using Reference Method 311 in Appendix A of 40 CFR Part 63. Vendor data based on this Method is an appropriate substitute.

Recordkeeping and Reporting

Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and the supporting background documents upon request that pertain to this operating permit.

A report summarizing the consumption information shall be submitted each calendar quarter by the 15th day of January, April, July, and October, in a format approved by the Department in advance.

Emission Unit No. 002: Sand Blasting

Overview
Sandblasting takes place outside to prepare the pilings for coating. Compressed air for the sandblasting is provided by electric or portable diesel air compressors. All emissions are fugitive.

Emissions Standards
Sandblasting is subject only to the General Provisos for a major source.

Recordkeeping and Reporting
Records shall be kept of the tons of blast media used each year at the facility. Particulate emissions are estimated annually for Title V fees.

Emission Unit No. 003: Shotblasting

Overview
A shot blasting machine with baghouse is used to prepare the surface of small pieces for coating. The emission unit was established in Air Permit 503-6008-X002 issued on December 17, 2020, which was subsequently incorporated into the Title V permit on January 14, 2022.

Emissions Standards
Opacity
These units shall not discharge into the atmosphere opacity greater than twenty percent (20%), as determined by a six (6) minute average. During one six (6) minute period during any sixty (60) minute period, this unit may discharge opacity not exceeding forty (40%) percent as required by ADEM Admin. Code 335-3-4-.01.

Particulate Matter
These units shall not discharge into the atmosphere particulate matter in any one hour in excess of the allowable particulate emission rate as calculated by the process weight curve defined in ADEM Admin. Code R. 335-3-4-.04. Allied is located in Mobile County, which is a Class 1 County. The process weight curve used to define the emission limit is $E=3.59P^{0.62}$.

Emission Monitoring
While the process is operating, someone familiar with the process shall perform an instantaneous visible emissions check of the baghouse at least once per week during daylight hours. If visible emissions are observed, the facility shall initiate corrective action as soon as practicable, but no longer than 24 hours from the time of observation of the visible emissions, and an additional instantaneous visible emissions check shall be performed after corrective action is complete to ensure that the visible emissions have been eliminated.

The baghouse(s) and filter(s) shall be inspected every 12 months, but more frequently when visible emissions have been observed. If the results of the inspection indicate that cleaning, maintenance, or replacement is needed, such action shall be completed within 24 hours of completing the inspection.

Recordkeeping and Reporting
A logbook of the visible emissions required in the Emission Monitoring section shall be maintained, including the date, time, and results of each observation, the date, time, and results of any physical inspections performed, and the date and time of any cleaning, maintenance, or replacement. The logbook shall be retained for at least five years and available for inspection upon request.

Fugitive Dust
The fugitive dust potential was evaluated and is not expected to be of concern at this facility. The facility utilizes curtains along the plant property, and the plant property and travel areas are covered by gravel surfaces. No stockpiles of dust producing materials are planned. While no fugitive dust plan will be required at this time, the Department will require a plan in the future if issues arise.

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.

Recommendations

Based on the above information, I recommend renewing Title V Permit No. 503-6008 to Allied Steel, pending the 30-day public comment period and the 45-day EPA review.

Blake Holden

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Blake Holden
Industrial Chemicals Section
Air Division

October 15, 2026