Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Stefanie K. Taillon
Secretary of Natural and Historic Resources

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Director

DRAFT/PROPOSED

STATEMENT OF LEGAL AND FACTUAL BASIS

New Millennium Building Systems, LLC
2535 Diuguids Lane, Salem, Virginia
Permit No. BRRO-20338

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9VAC5 Chapter 80, New Millennium Building Systems, LLC has applied for a Title V Operating Permit for its Salem facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Permit Writer: _____ Date:_____
P. Tylor Malcolm
(540) 795-9773

Air Permit Manager: _____ Date:_____
Paul R. Jenkins

Regional Director: _____ Date:_____
Robert J. Weld

FACILITY INFORMATION

Permittee
New Millennium Building Systems, LLC
1690 Broadway Building 19, Suite 160
Fort Wayne, IN 46802

Facility
New Millennium Building Systems, LLC
2535 Diuguids Lane
Salem, VA 24153

County-Plant Identification Number: 51-161-00181

FACILITY DESCRIPTION

NAICS Code: 332312 – fabricated structural metal manufacturing

New Millennium Building Systems, LLC, is a manufacturer of steel joists, girders, bridging, and decking located in both Roanoke County and the City of Salem, Virginia. The facility receives stock steel and whole steel coils that are cut, shaped, and welded before being dipped in or rolled with paint. The facility has four (4) emission units located on site, EU001 through EU004.

The Joists and Bridging Manufacturing emissions unit (EU001) consists of the Accessories Department, the Joist Lines and the Bridging Line, which are described below.

Accessories Department:
The manufacturing facility receives stock steel and whole steel coils into the warehouse area via railcar and truck. The Accessories Department will slit steel, then form it into angle or channel shapes using machines called "rollformers" and "channelformers". The angle and channel shapes are the primary parts used on the Joist Lines to make joists and girders. The Accessories Department also uses various machines to cut, punch, bend, etc. other steel parts that are used to make the final product. A plasma cutter is used to cut steel. Each rollforming machine has a dedicated welder, making a total of 3 welders. Welding is done to join the ends of two coils of steel together.

Joist Lines:
There are three joist lines: Joist Line #1 - Rod/Crimp Line, Joist Line #2 - Long Span, and Joist Line #3 – Specialty. Steel from the Accessories Department is assembled into a joist at the rigging area. Rigging involves assembling the joist on a table and then applying clamps and tack welding to hold the pieces together. The rigging area has 5 MIG welders that are used for tack

welding. Once the joist is assembled, the joist moves down the line on a powered roller conveyor to the welding pit where the joist is welded together. The welding pit utilizes up to 10 MIG welders. The majority of welding wire usage and welding wire air emissions on this Joist Line occur at the welding pit. Next, the welded joist moves down the line on the powered roller conveyor to one of the three dip painting tanks (DT2, DT3, or DT4). The joist is lowered into the dip tank using an overhead crane. Once the joist is dipped and raised out of the paint tank, it is placed on a steel rack above the paint tank to allow the excess paint to drain back into the tank. Once the excess paint has drained off the joist, the joist is taken out to the shipping yard to await shipment to the customer.

Bridging Line:
The Bridging Line takes angled steel from the Accessories Department and punches holes into the pieces so they may be used as Bridging. Bridging is the steel that is used to "bridge" together and stabilize joists. The Bridging line also is equipped with 2-3 welders for use when the Line makes other steel pieces, such as joist substitutes. Once the steel on the Bridging Line is complete, it is painted using the dip painting tank (DT5). The steel is lowered into the dip tank using an overhead crane. Once the steel is dipped and raised out of the paint tank, it drains over the paint tank to allow the excess paint to drain back into the tank. After the excess paint has drained, the steel is stored inside the plant until it is delivered to the customer.

All four paint tanks (DT2-DT5) are equipped with a lid and kept covered when not in use.

Portions of EU001 are subject to the area source MACT Subpart XXXXXX (Standards for Hazardous Air Pollutant Area Source Standards for Nine Metal Fabrication and Finishing Source Categories), whose requirements are discussed in a later section of this Statement of Basis.

The Decking Manufacturing emissions unit (EU002) consists of the Deck Line, used to manufacture steel decking that is used for sub-flooring and sub-roofs in buildings. New Millennium receives whole coils of steel via rail or truck. A coil is "uncoiled" and fed into the line where it passes through three cleaning tanks, identified as the "Pre-Wash Tank", the "Wash Tank", and the "Rinse Tank". These tanks use heated water baths to remove the oily coating and surface impurities that are on the steel when it is received. The cleaning tanks are each equipped with natural gas-fired heaters as described in the current permit. Alkaline and acid cleaners are used to aid in cleaning the steel.

Next, the steel is fed through a rollcoater (RC1) that applies a surface preparation that promotes bonding of the paint and helps to prevent corrosion. The coating is a corrosive liquid which does not contain any volatile organic compounds (VOC) or volatile HAP. The surface preparation contains some metallic HAP but because the material is applied to the steel by rollcoating, there is no particulate emitted into the air.

After RC1, the steel passes through the first paint rollcoater (RC2) and then through a second paint rollcoater (RC3). There are a variety of ways the steel may be treated at this stage. Steel may be coated with two, one, or no coats of paint. The two paint rollcoaters in sequence can be used one after the other to apply two coats of paint to the steel (one coat with each rollcoater) or one of them may be used to apply a single coat and the other rollcoater would not be used. In the event where the steel is not to receive a coating, it would go through the line with no coating being applied at RC2 or RC3.

After the paint rollcoaters, the steel may be coated with an evaporative oil, depending on the paint scenario. Some scenarios will not involve the steel receiving the evaporative oil coating. If the evaporative oil is applied, it is done so by a rollcoating type application. Next the steel is fed through dies that roll form the steel into corrugated decking. A small amount (3 to 30 gallons a month) of "vanishing oil" is used at the roll-formers to assist with processing the decking material. Vanishing oil largely contains mineral spirits. The decking is cut to the desired length, then stacked and bundled. A final treatment may be done to the bundled steel, which is an application of a Clear Edge Coat, which is applied with a Graco 390 Electric Airless Sprayer. This is a final rust protection measure that may be used depending on the paint scenario or job requirements. Decking is stored in a warehousing area inside the plant until it is shipped to the customer.

Note that the Decking Rollcoating and Painting System includes rollcoating, material treatment, edge treatment, edge sealers, thinners and clean up substances.

The facility is a Title V major source of Volatile Organic Compounds (VOCs) due to the emissions from the painting process. The facility is an area source for Hazardous Air Pollutants (HAP) in the form of metal HAP resulting from the facility's welding operations.

This source is located in an attainment area for pollutants and is a PSD synthetic minor source. However, the City of Salem and Roanoke County are designated as a VOC and NOx emission control area. Accordingly, the following DEQ Existing Source Rules apply as described below:

Existing Source Rule 4-34 (Emission Standards for Miscellaneous Metal Parts and Products Coating Application Systems; 9VAC5-40-4760) applies to the Joist and Bridging Lines (EU001). The requirements of Rule 4-34 are included in the 12/28/2021 Permit Conditions and are incorporated into this renewal.

Existing Source Rule 4-30 (Emission Standards for Metal Coil Coating Application Systems; 9VAC5-40-4160) applies to the Decking Line (EU002). However, Decking Manufacturing is subject to NSPS Subpart TT (Standards of Performance for Metal Coil Surface Coating). The NSPS Subpart TT VOC standard is more stringent than the Rule 4-30 VOC standard. The NSPS

requirements and the requirements of Rule 4-30 are included in the 12/28/2021 Permit Conditions and are incorporated into this renewal.

Existing Source Rule 4-24 (Emission Standards For Solvent Metal Cleaning Operations Using Non-Halogenated Solvents; 9VAC5-40-3260) applies to the Solvent Degreasing Operations (EU003), which consist of six (6) parts washers using an aqueous based cleaner. The parts washers are located in various locations throughout the facility, with three (3) in/near the Decking line, one (1) in/near the Joist line, and two (2) in/near the maintenance department. As stipulated in 9VAC5-40-10B and 9VAC5-50-10D, the provisions of Chapter 40 ("existing source" rules), generally do not apply to "new sources" which are covered by Chapter 50 and/or permits issued under Chapter 80 unless such Chapter 40 provisions are more restrictive. The parts washers are not explicitly covered by a Chapter 50 standard or the underlying Minor NSR permit, and therefore the provisions of Rule 4-24 are applicable and have been included in the Title V renewal permit.

On August 9, 2024, the permittee submitted an off-permit change notification per 9VAC5-80-280B to the DEQ, Blue Ridge Regional Office (BRRO). Included in this off-permit change notification was information regarding the addition of one (1) waterjet table and one (1) natural gas fired emergency generator. The waterjet table utilizes a water nozzle with splash guards that uses a high-pressure water-abrasive mixture to cut steel pieces that are submerged under water. The waterjet table is considered an insignificant activity per 9VAC5-80-720B and has been added to the facility's insignificant emission units list.

The Emergency Engine (EU004) is a Rehlko KG100. The engine is natural gas fired, with a nameplate rated heat input capacity of 1.5 MMBtu/hr and a nameplate rated output of 60Hz/100 kW/134 hp. This emergency engine is exempt from minor new source review permitting. However, it is subject to the federal requirements of 40 CFR 60 Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines) and 40 CFR 63 Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). The permittee shall comply with 40 CFR 63 Subpart ZZZZ by complying with 40 CFR 60 Subpart JJJJ. The order date for this emergency engine is December 9, 2024, and it is certified by the manufacturer (Kohler Co.) to meet the emission standards of 40 CFR 60 Subpart JJJJ.

The facility is currently permitted under a minor NSR Permit issued on December 28, 2021. The facility is currently subject to the Title V permit effective November 17, 2020, and under the application shield provisions of 9VAC5-80-80 F.

The following applicable federal regulations are included in the Title V permit:

- 40 CFR 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines: This MACT applies to the facility's Emergency Engine (EU004).

- 40 CFR 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines: This NSPS applies to the facility's Emergency Engine (EU004).

- 40 CFR 63 Subpart XXXXXX – Area Source Standards-Metal Fabrication and Finishing Source Categories: This MACT applies to the facility's MIG welding operations in the Joist and Bridging Line (EU001).

- 40 CFR 60 Subpart TT – Standards of Performance for Metal Coil Surface Coating: This NSPS applies to the facility's decking roll coating operations in the Decking Line (EU002). All NSPS TT requirements have been included by reference. The NSPS requirements were included in the December 28, 2021, minor NSR permit, and those conditions are included in this Title V permit.

Note that 40 CFR 64 Compliance Assurance Monitoring (CAM) does not apply to any emission units at the facility. No control devices are used to achieve compliance with any emission limitation or standard.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was most recently conducted on November 6, 2024. All reports and other data required by permit conditions or regulations, which are submitted to the DEQ, have been evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNITS

Please refer to the Emission Units table in the Title V permit on page 3.

EMISSIONS INVENTORY

Emissions from the facility in 2024 are summarized in the following tables.

2024 Criteria Pollutant and Greenhouse Gas Emissions in Tons/Year

Emissions	VOC	CO	SO_2	PM_{10}	$PM_{2.5}$	NO_X	CO_2e

Total	50.56	0.12	0.00	1.21	1.21	0.62	-

2024 Facility Hazardous Air Pollutant (HAP) Emissions

Pollutant	2024 Hazardous Air Pollutant Emission in Tons/Yr
Manganese Compounds	0.07

Emergency Engine Requirements – (EU004)

Limitations

Condition 1 Visible emissions from the engine shall not exceed 20 percent opacity except as specified.

Visible emissions observations of the emergency engine (EU004) are not included because properly maintained emergency engines firing natural gas are not expected to produce visible emissions. Requirements for operation of the emergency engine in a manner consistent with good air pollution control practices for minimizing emissions (Condition 67), in addition to the general compliance, monitoring, testing, and recordkeeping, requirements in the MACT ZZZZ section and the NSPS JJJJ section meet permit content obligations at 9VAC5-80-110 E (monitoring) & K (compliance) and are considered sufficient to assure compliance with the limits included in this permit.

MACT Subpart ZZZZ – Stationary Reciprocating Internal Combustion Engine Requirements – (EU004)

Review of MACT Subpart ZZZZ "Stationary Reciprocating Internal Combustion Engine Requirements" as applicable to EU004:

According to MACT Subpart ZZZZ, emergency engine EU004 is classified as "new". New SI engines must demonstrate compliance with Subpart ZZZZ by complying with applicable NSPS Subpart JJJJ requirements (63.6590(c)). See table below for details.

Unit Ref No.	Construction Date	Constructed pre-6/12/2006?	Fuel	Site Rating (> 100 bhp?)	Engine	MACT ZZZZ Classification
EU004	12/9/2024	No	Natural Gas	Yes	SI Engine	New

General Compliance Requirements

Condition 2 For emergency engine EU004, the permittee shall comply with 40 CFR 63 Subpart ZZZZ by complying with the applicable requirements of 40 CFR 60 Subpart JJJJ.

NSPS Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines – (EU004)

Review of NSPS JJJJ, "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines" as applicable to EU004:

EU004 is a spark ignition emergency engine. Subpart JJJJ applies to spark ignition (SI) internal combustion engines (ICE) that commence construction after June 12, 2006, where the stationary SI ICE are manufactured on or after January 1, 2009, for emergency engines with a maximum engine power greater than 19KW (25HP).

Based on the engine data submitted, EU004 is subject to NSPS Subpart JJJJ Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. See table below for details.

Unit Ref No.	Equipment Description	Fuel	Rating (kW)	Rating (hp)	Constructed after June 12, 2006	Exempt from JJJJ
EU004	Rehlko KG100	Natural Gas	100	134	12/9/2024	No

Condition 3 The permittee shall comply with the applicable requirements of 40 CFR 60 Subpart JJJJ.

Emissions Standards

Condition 4 The permittee shall comply with the applicable emissions standards as specified over the entire life of the emergency engine.

Other Requirements

Condition 5 The permittee shall install a non-resettable hour meter as specified unless the permittee maintains records as specified.

Compliance Requirements

Condition 6 The permittee shall operate the emergency engine as specified.

Condition 7 The permittee may operate the emergency engine using propane for a maximum of 100 hours as specified. When applicable, the permittee is required to conduct a performance test to demonstrate compliance as specified.

Condition 8 If engine EU004 is a non-certified engine or, if certified, the permittee does not operate and maintain the engine(s) and control device according to the manufacturer's written emission-related instructions, the permittee is required to perform initial performance testing as specified.

Condition 9 The permittee shall demonstrate compliance as specified.

Testing Requirements

Condition 10 If the permittee conducts performance tests, they shall conduct them as specified.

Reports and Records

Condition 11 The permittee shall keep records of the information as specified.

Condition 12 If engine EU004 does not meet the standards applicable to non-emergency engines, the permittee shall keep records as specified.

General Provisions

Condition 13 The permittee shall comply with the General Provisions (40 CFR 60.1 through 60.19) as applicable.

Joist and Bridging Manufacturing Requirements – (EU001)

Citations

The following citations from the Virginia Administrative Codes identify the underlying authorities to implement the specific requirements determined to be applicable in the NSR permit:
9VAC5-40-4780 Standard for volatile organic compounds.
9VAC5-50-260 Standard for stationary sources.
9VAC5-80-110 Permit Content.
9VAC5-80-1180 Standards and Conditions for Granting Permits.

Limitations

Condition 14 VOC emissions from Joist and Bridging painting are required to be controlled by process controls.

Condition 15 VOC and particulate emissions from Joist and Bridging painting are required to be controlled by using the dip coating process.

Condition 16 VOC emissions from Joist and Bridging painting are required to be controlled by proper work practices.

Condition 17 Particulate emissions from Joist welding are required to be controlled by process controls by using MIG welding as the primary means for welding joints.

Testing and Recordkeeping

Condition 18 The VOC content for solvent-based paints is required to be tested and recorded.

Condition 19 The VOC content of water-based paints is required to be verified by formulation data.

The monitoring, testing and recordkeeping requirements that are included in this section and in the Facility Wide Conditions section meet permit content obligations at 9VAC5-80-110 E & K and are considered sufficient to assure compliance with the limits included with this permit. For the purpose of Title V, all records relevant to this permit and facility must be maintained for 5 years.

MACT Subpart XXXXXX - Area Source Standards-Metal Fabrication and Finishing Source Categories (Joist and Bridging MIG Welding of EU001)

Review of MACT XXXXXX – "Area Source Standards-Metal Fabrication and Finishing Source Categories" as applicable to EU001:

The facility is minor for HAP and is subject to MACT Subpart XXXXXX – Standards for Hazardous Air Pollutant Area Source Standards for Nine Metal Fabrication and Finishing Source Categories because:

- The facility contains operations in the Subpart XXXXXX listed source category of Fabricated Structural Metal Manufacturing.

- The facility has the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead. The Joist and Bridging

MIG Welders use welding wire containing manganese to weld steel to manufacture joist, girders, and bridging. The stock steel content has 1.0% manganese by weight based on 2014 steel mill certification. The Joist and Bridging MIG Welding is a welding affected source per 40 CFR 63.11514(b).

- The Subpart applies to both existing and new sources. The facility is an existing affected source.

- EU002 is not an affected source of Subpart XXXXXX because it does not perform dry abrasive blasting, machining, dry grinding and dry polishing with machines, spray painting or welding activities as defined in 40 CFR 63.11522. EU002 applies coatings to products with rollcoaters, which are exempt from the Subpart's definition of spray painting.

General Compliance

Condition 20 The permittee is subject to the applicable provisions of 40 CFR 63 Subpart XXXXXX.

Standards and Compliance Requirements

Condition 21 The permittee shall meet the applicable standards and management practices for welding.

Condition 22 The permittee shall comply with the applicable monitoring requirements as specified.

Condition 23 The permittee shall prepare and submit annual certification and compliance reports as specified.

Condition 24 The permittee shall maintain records of all applicable information and data as specified.

Other Requirements

Condition 25 The permittee shall comply with applicable general provisions as specified.

Decking Manufacturing Requirements – (EU002)

Citations

The following citations from the Virginia Administrative Codes and the federal air regulations identify the underlying authorities to implement the specific requirements determined to be applicable in the Title V permit:

9VAC5-40-4270 Notification, Records and Reporting
9VAC5-50-30 Performance testing.
9VAC5-50-50 Notification, Records and Reporting.
9VAC5-50-260 Standard for stationary sources.
9VAC5-50-410 Designated standards of performance.
9VAC5-80-110 Permit Content.
9VAC5-80-1180 Standards and Conditions for Granting Permits.

Limitations

Condition 26 VOC emissions from Deck coating are required to be controlled by coatings that do not exceed 2.33 pounds per VOC per gallon of coating solids.

Condition 27 VOC and particulate emissions from Deck coating are required to be controlled by using the roll coating process.

Testing and Recordkeeping

Condition 28 Monthly tests are required to be conducted to determine monthly volume-weighted average emissions of VOCs as specified. Tests shall be conducted and reported as stipulated.

Condition 29 Method 24, or data provided by the formulator of the coating, are required for determining the VOC content of each coating as applied.

Reporting

Condition 30 The permittee shall submit written reports as specified.

The testing, recordkeeping and reporting requirements that are included in this section and in the Facility Wide Conditions section below meet permit content obligations at 9VAC5-80-110 E & K and are considered sufficient to assure compliance with the limits included with this permit. For the purpose of Title V, all records relevant to this permit and facility must be maintained for 5 years.

Solvent Degreasing Operations - Parts Washers Requirements - (EU003)

Citations

The following citations from the Virginia Administrative Codes identify the underlying authorities to implement the specific requirements determined to be applicable in the Title V permit:

9VAC5-40-3280 Standard for volatile organic compounds.
9VAC5-40-3290 Control technology guidelines.
9VAC5-80-110 Permit Content.

Limitations

Condition 31 The permittee shall limit the use of cold cleaners as specified.

Condition 32 VOC emissions from the degreaser are required to be controlled by the process controls specified.

Condition 33 The permittee shall consistently operate the degreasers in compliance with good operating practices as specified.

Condition 34 The permittee shall dispose of the waste solvent from solvent metal cleaning operations as specified.

Recordkeeping

Condition 35 The permittee shall maintain records of all emission data and operating parameters as specified.

The recordkeeping that is included in this section meets permit content obligations at 9VAC5-80-110 E & K and is considered sufficient to assure compliance with the limits included in this permit. For the purpose of Title V, all records relevant to this permit and facility must be maintained for 5 years.

Facility Wide Conditions

Citations

The following citations from the Virginia Administrative Codes identify the underlying authorities to implement the specific requirements determined to be applicable in the NSR permit:
9VAC5-50-20 Compliance.

9VAC5-50-30 Performance testing.
9VAC5-50-50 Notification, Records and Reporting.
9VAC5-50-90 Standard for fugitive dust/emissions.
9VAC5-50-260 Standard for stationary sources.
9VAC5-50-410 Designated standards of performance.
9VAC5-80-110 Permit Content.
9VAC5-80-1180 Standards and Conditions for Granting Permits.
40 CFR 60, Subpart A - General Provisions.
40 CFR 60, Subpart TT - Standards of Performance for Metal Coil Surface Coating.

Limitations

Condition 36 The combined throughput of VOC shall not exceed 245.5 tons per year, calculated monthly as the sum of each consecutive 12-month period as stipulated.

Condition 37 The combined emissions of VOC shall not exceed 245.5 tons per year as specified.

Condition 38 The approved fuel for the facility is natural gas.

Testing

Condition 39 The permitted facility shall be constructed so as to allow for emissions testing.

Condition 40 If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ.

Condition 41 Upon request by the DEQ, the permittee shall conduct performance tests to demonstrate compliance.

Operating Procedures and Recordkeeping

Condition 42 The permittee shall maintain records of emission data and operating parameters as specified.

Condition 43 At all times, the permittee shall maintain and operate the affected source in a manner consistent with good pollution control practices. The permittee shall follow the prescribed actions and maintain records as specified.

Condition 44 The permittee shall maintain records as specified.

Work Practice Standards

Condition 45 At all times the disposal of volatile organic compounds shall be accomplished by taking measures as specified.

STREAMLINED REQUIREMENTS

None identified.

INSIGNIFICANT EMISSIONS UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9VAC5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9VAC5-80-720B)	Rated Capacity (9VAC5-80-720C)
-	Pre-wash tank heater (Deck Line), natural gas fired	9VAC5-80-720C	-	3.5 MMBtu/hr
-	Wash tank heater (Deck Line), natural gas fired	9VAC5-80-720C	-	3.5 MMBtu/hr
-	Rinse tank heater (Deck Line), natural gas fired	9VAC5-80-720C	-	2.0 MMBtu/hr
-	Two make-up air units for Joist Plant heat, natural gas fired	9VAC5-80-720C	-	2.5 MMBtu/hr each
-	Two make-up air units for Deck Plant heat, natural gas fired	9VAC5-80-720C	-	<2 MMBtu/hr each
-	Heating for office, natural gas fired	9VAC5-80-720C	-	<2 MMBtu/hr
-	Eight space heaters, natural gas fired	9VAC5-80-720C	-	125,000 Btu/hr in aggregate
-	Water-based cutting fluid for roll forming lubricant and slitting operations	9VAC5-80-720B	VOC	-
-	Cutting fluid for sawing operations	9VAC5-80-720B	VOC	-
-	Misc. spray paint (aerosol cans)	9VAC5-80-720B	VOC, PM	-

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9VAC5-80-720B)	Rated Capacity (9VAC5-80-720C)
-	Plasma cutter (joist fabrication)	9VAC5-80-720B	PM, NOx, HAP metals	-
-	Plasma cutter (bridging fabrication)	9VAC5-80-720B	PM, NOx, HAP metals	-
-	Waterjet table (accessories department)	9VAC5-80-720B	PM	-

The citation criteria for insignificant activities are as follows:
9VAC5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9VAC5-80-720 B - Insignificant due to emission levels
9VAC5-80-720 C - Insignificant due to size or production rate

COMPLIANCE PLAN

N/A

PERMIT SHIELD AND INAPPLICABLE REQUIREMENTS

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the date of permit issuance and specifically identified in the permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

- 40 CFR 63 Subpart T – National Emission Standards for Halogenated Solvent Cleaning.

  The batch cold cleaning machines, referenced in this permit as parts washers (EU003), utilize a non-halogenated solvent for their cleaning purposes.

- 40 CFR 64 – Compliance Assurance Monitoring

  Compliance Assurance Monitoring (CAM) does not apply to any emission units at the facility. No control devices are used to achieve compliance with any emission limitation or standard.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9VAC5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting

semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

Federal Enforceability

Article 1 (9VAC5-80-110 N) states that all terms and conditions in the Title V permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.

Permit Expiration

This condition refers to the DEQ taking action on a permit application. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the Code of Virginia, and the "Department of Environmental Quality Agency Policy Statement No. 2-09".

This general condition cite(s) the Article(s) that follow(s):

Article 1 (9VAC5-80-50 et seq.), Part II of 9VAC5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:
9VAC5-80-80. Application
9VAC5-80-140. Permit Shield
9VAC5-80-150. Action on Permit Applications

Failure / Malfunction Reporting

Section 9VAC5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9VAC5-20-180 is from the general regulations. All affected facilities are subject to section 9VAC5-20-180 including Title V facilities. A facility may make a single report that meets the requirements of 9VAC5-20-180. The report must be made within four daytime business hours of discovery of the malfunction.

In order for emission units to be relieved from the requirement to make a written report in 14 days the emission units must have continuous monitors meeting the requirements of 9VAC5-50-410 or 9VAC5-40-41.

This general condition cites the sections that follow:

9VAC5-40-41. Emissions Monitoring Procedures for Existing Sources
9VAC5-40-50. Notification, Records and Reporting
9VAC5-50-50. Notification, Records and Reporting

This general condition contains a citation from the Code of Federal Regulations as follows:
40 CFR 60.13 (h). Monitoring Requirements.

Permit Modification

This general condition cites the sections that follow:

9VAC5-80-50. Applicability, Federal Operating Permit for Stationary Sources
9VAC5-80-190. Changes to Permits
9VAC5-80-260. Enforcement
9VAC5-80-1100. Applicability, Permits For New and Modified Stationary Sources
9VAC5-80-1605. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
9VAC5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains a citation from the Code of Federal Regulations that follows:
40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.
40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.
40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.

This general condition cites the regulatory sections that follow:
9VAC5-60-70. Designated Emissions Standards
9VAC5-80-110. Permit Content

STATE-ONLY ENFORCEABLE REQUIREMENTS

The applicant did not identify any state-only enforceable requirements and therefore none are included within the renewal Title V Federal Operating Permit.

FUTURE APPLICABLE REQUIREMENTS

None were identified during this review of the renewal of the Title V Federal Operating Permit.

CONFIDENTIAL INFORMATION

No confidential information request has been made. All portions of the Title V permit and application are available for public review.

PUBLIC PARTICIPATION

The proposed permit will be placed on public notice from August 27, 2025, to September 26, 2025. The notice will be published in Cardinal News newspaper on August 27, 2025.

[XX] comments were received during the public comment period of [Date] to [Date].

The draft/proposed permit was sent to EPA for concurrent review on August 27, 2025. On [Date], [EPA Representative] responded [results of EPA review].