

Commonwealth of Pennsylvania
Department of Environmental Protection
March 29, 2005

Subject: Title V Operating Permit Renewal Review
Dura-Bond Steel Corporation, Inc
Export Facility
Export Borough
Westmoreland County

To: Air Quality Permit File# OP-65-00053

From: Sheri L. Guerrieri, P.E.
Air Pollution Control Engineer
Air Quality Control
Southwest Regional Office

Thru: Barbara R. Hatch, P.E.
Facilities Permitting Section
Air Quality Control
Southwest Regional Office

And Mark A. Wayner, P.E.
Regional Program Manager
Air Quality Control
Southwest Regional Office

Background:

Dura Bond is a specialty fabricator and coater of steel pipe and steel products located in Export Borough, Westmoreland County. The material is made by others and delivered to Dura-Bond for processing, then shipped elsewhere. The Department received a Title V State Only Operating Permit Renewal Application on December 27, 2004 for their Export facility. The application was deemed clerically complete January 28, 2005. Administratively complete February 9, 2005

The pipe and steel coating operation consists of cleaning the material by sandblasting or by a Wheelabrator shot blast machine. After cleaning, the material is coated in the spray areas with a solvent based coating. Material is then placed in the lay down areas for final air drying and curing. Material in the lay down area may need to be forced cured, especially in the cooler months with portable natural gas heaters. After final curing, material is inspected and shipped to its final destination. Fabrication work is completed in the fabrication building. The building includes a submerged ARC Welder (SAW), a buring machine, two iron works, and six Flux Cored ARC Welders (FCAW). Material is processed in the building then stored outside until ready to be shipped.

Emission and Control Equipment:

A facility wide VOC emission limit of 92 tons per consecutive 12-month period has been established through compliance negotiations and will be included in the Title V permit. Issue Title V permit for five years. Records shall be maintained to demonstrate VOC compliance. These monthly records shall include at a minimum, type and quantity of coating used and the VOC content of the coating.

CAM does not apply since no VOC control devices are used.

Deminimus Increases: None

RFD Summary: None

Amendments: None

Operating Flexibility:

The Operating permit may include provisions to allow a permitted facility to make certain changes without requiring a permit revision. DuraBond has requested the flexibility of increasing emissions by the de minimus levels specified in 25 Pa Code § 127.449(d) and the installation of the minor sources listed in 25 Pa Code § 127.449(e). These provisions will be specified in the permit.

Streamlining:

Compliance with the BAT requirement of 25 Pa Code 127.1 for the baghouse visible emission standard of 10 % and particulate loading limitation of 0.02 gr/dscf ensures compliance with the 0.04 gr/dscf particulate emissions standard of 25 Pa Code 123.13 and the 20/60% opacity standard of 25 Pa Code 123.41.

Alternate Operating Scenarios:

Sources of Minor Significance:

Recommendations and Conclusions:

Dura Bond has met the regulatory requirements associated with this application submittal. The attached draft permit reflects the applicable regulatory requirements associated with this facility.