

**COMMONWEALTH OF VIRGINIA  
Department of Environmental Quality  
Blue Ridge Regional Office**

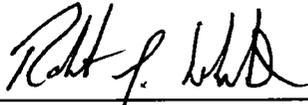
**STATEMENT OF LEGAL AND FACTUAL BASIS**  
Amendment to statement of Basis for August 27, 2014 Title V Permit

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 9 VAC 5 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.

Engineer/Permit Contact:  Date: February 22, 2017  
Keith Sandifer  
434-582-6232

Air Permit Manager:  Date: 2/22/17  
*for* David J. Brown

Regional Director:  Date: February 22, 2017  
Robert J Weld

**FACILITY INFORMATION**

Permittee  
New Millennium Building Systems, LLC  
100 Diuguids Lane  
Salem, VA 24153

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

County-Plant Identification Number: 51-161-00181

**SOURCE DESCRIPTION Changes to SOB dated August 27, 2014 – Modify Title V permit expiration date of August 26, 2019**

NAICS Code: 332312 - fabricated structural metal manufacturing

**SIGNIFICANT PERMIT MODIFICATION INFORMATION**

The source submitted an application on May 25, 2016 to increase the annual throughput of VOC to 22.1 tons per year through the decking line and decrease the joists and bridging line to 223.4 tons per year to their existing Title V permit dated August 27, 2014 (effective date). This also required a new minor NSR permit, which superseded the NSR permit approved on August 11, 2006 and amended October 22, 2007, to include the limits in the permit. This was accomplished in the NSR combined permit dated September 14, 2016 and amended November 22, 2016<sup>1</sup>. The conditions with the date of 9/14/16 or 11/22/2016 are conditions that were changed as a result of the requested change in decking throughput and the reduced joist and bridging painting system. The emission units table and the conditions in the August 27, 2014 Title V permit are changed to reflect the amended NSR permit dated September 14, 2016 as amended November 22, 2016 NSR permit<sup>2</sup> as delineated below.

Emission Unit Table revised as follows: The “Applicable Permit Date” column changed to “Applicable Permit Document Date”. Also, the “permit date” in the regulatory citation for the August 27, 2014 Title V permit conditions listed below is revised to either “September 14, 2016” or “November 22, 2016” as stated in the new Title V permit.

Conditions 5 and 6 have been changed to reflect the joist and bridging and painting system reduction in permitted VOC emissions from 233.3 tons per year to 223.1 tons per year.

Condition 10 provides the monitoring and recordkeeping. Only the date of the permit document changed.

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<sup>1</sup> The November 22, 2016 amendment was a result of an administrative amendment (see the source’s November 9, 2016 request) to correct the following typographic error in Condition 21 of the September 14, 2016 permit: Annual VOC limit changed from 223.1 tons/yr to 223.4 tons/yr the value stated in Condition 16 of the September 14, 2016 permit.

<sup>2</sup> The condition number of the September 14, 2016 NSR, amended November 22, 2016, permit document is provided in the corresponding Title V permit condition. All of the revised conditions from the September 14, 2016, amended November 22, 2016, permit are addressed in the Title V except for Condition 20\*. The September 14, 2016 permit is a combined permit and the most recent effective date of each condition is listed in the permit in accordance with 9VAC5-80-1255 E. Therefore, “10/22/07” is retained for the Title V conditions not addressed in this SOB.

\*Condition 20 “Except where this permit is more restrictive than the applicable requirement, the NSPS Subpart TT, Metal Coil Surface Coating, equipment as described in the Equipment List shall be operated in compliance with the requirements of 40 CFR Part 60 Subpart TT.”

Condition 13 changed to reflect that the VOC emissions are controlled by the use of coatings with a limited VOC per gallon content instead of water-based coatings or DEQ approved equivalent.

Condition 14 changed to reflect how the VOC and particulate emissions are controlled.

Condition 15 removed, which resulted in the renumbering of the Title V Conditions. Condition 15 contained the requirements of Condition 8 of the October 22, 2007 permit; and this condition was not included in the September 14, 2016 permit.

Condition 16 (now Condition 15) changed to reflect the decking coating and painting system increase in permitted VOC emissions from 12.2 tons per year to 22.1 tons per year; and includes the VOC lb/gal solids applied standard of NSPS Subpart TT.

Condition 17 (now Condition 16) changed to reflect the increase to 22.1 tons per year and to include the 2.33 lb/gal solids applied.

Condition 18 (now Condition 17) provides the monitoring and recordkeeping. Only the date of the permit document changed.

Condition 20 (now Condition 19) changed to show the VOC lbs/gallon limit of NSPS Subpart TT and includes additional recordkeeping.

Condition 23 (now Condition 22) changed to include the 2.33 lb/gal NSPS limit.

Conditions 35 (now Condition 34) and 37 (now Condition 36) limit the combined throughput of VOC in the joist and bridging coating, decking forming and coating, thinner s and cleanup solvents. Only the date of the permit document changed.

Condition 39 (now Condition 38) limits the disposal of volatile organic compounds. Only the date of the permit document changed.

Condition 40 (now Condition 39) contains the facility wide monitoring and recordkeeping for natural gas consumption and MSDS, CPDS, and other vendor information showing VOC content, HAP content, and solids content for each coating, thinner, and cleanup solvent used. Only the date of the permit document changed.

## **PUBLIC PARTICIPATION**

The proposed permit modification will be placed on public notice in the Roanoke Times from January 20, to February 21, 2017. In an email, dated February 16, 2017, EPA stated that they would not be providing comments.