STATEMENT OF BASIS

New Millennium Building Systems, LLC
Lake City
Facility ID No.: 0230046
Columbia County

Initial Title V Air Operation Permit
DRAFT Permit No.: 0230046-003-AV

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

New Millennium manufactures steel joist, girders, bridging and decking, and consists of the following emission units.

E.U. ID No.	Brief Description
001	Metal Coil Surface Coating Process
002	Dip Tank Coating Process

Steel Decking Manufacturing (Emissions Unit 001). Raw steel coil is "uncoiled" and fed into the line where it passes through three (3) 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. Phosphoric acid cleaner is used to aid in cleaning the steel.

The steel is then fed through a rollcoater (RC1) that applies a surface preparation that promotes bonding of the paint and helps to prevent corrosion. The steel then passes through the first paint rollcoater (RC2) where paint is applied, and depending upon the job requirements, followed by a second rollcoater (RC3) for a second application of paint. After the paint rollcoaters, the steel may be coated with evaporative oil (EO), depending on the paint scenario. Edge Sealer (ES) may also be used as a final rust protection measure.

Steel Joist Manufacturing (Emissions Unit 002). The facility receives steel into a warehouse area via railcar and truck. The accessories department slits the steel, then forms it into angle or channel shapes, which are the primary parts used on the joist lines to make joists and girders. Steel is assembled into a joist at the rigging area. The assembled joist is welded together and moved down by conveyor to the dip paint tank. This facility has four (4) dip paint tanks that vary in sizes. The table below shows the size of the tanks.

Dip Tank	Dimensions	Volume (gallon)
DT2	64' long, 2' wide, 4' deep	3,840
DT3	84' long, 2' wide, 5' deep	6,240
DT4	128' long, 2' wide, 8' deep	15,360
DT5	24' long, 3' wide, 3' deep	1,620

Once the joist is dipped and raised out of the paint tank, it is placed on a steel rack above the tank for a few minutes allowing the excess paint to drain back into the tank. Once the excess paint has drained off the joist, the joist is taken out of the building to the shipping yard. The facility will do regular on-site VOC testing (EPA Method 24) to determine the amount of Mineral Spirits (solvent) to be added to each paint tank to maintain a good working viscosity while at the same time minimizing paint usage.

Based on the Air Construction Permit Application received May 27, 2004, this facility **is** a major source of Volatile Organic Compounds (VOC).

Based on the initial Title V Air Operation Permit application received July 26, 2005, this facility **is not** a major source of hazardous air pollutants (HAPs).

CAM **does not** apply.

Also included in this permit are miscellaneous insignificant/exempt emission units and/or activities.