



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET SW
ATLANTA, GEORGIA 30303-8960

SENT VIA ELECTRONIC MAIL

Blake Williams
Director, Plant Operations
C & B Piping, Inc.
8804 Parkway Drive
Leeds, Alabama 35094

Dear Blake Williams:

On March 8, 2023, the U.S. Environmental Protection Agency Region 4 Air Enforcement Branch conducted a partial compliance inspection at the C & B Piping, Inc., located in Leeds, Alabama. Enclosed is a copy of the final report generated by the U.S. Environmental Protection Agency's Region 4, South Air Enforcement Section.

Should you have any questions regarding this inspection report, please contact me at (404) 562-9172, or by email at Porter.Sharron@epa.gov

Sincerely,

SHARRON

PORTER

Sharron Porter

Environmental Engineer

South Air Enforcement Section

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SHARRON PORTER
Date: 2023.05.04
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Enclosures (1)

ENCLOSURE A
FINAL INSPECTION REPORT

**United States Environmental Protection Agency (EPA) Region 4
Air Enforcement Branch
Final Inspection Report**

I. GENERAL INFORMATION

Facility Name: C & B Piping, Inc.

Location (Address): 8804 Parkway Drive
Leeds, Alabama 35094

Inspection Date: March 8, 2023

Type of Inspection (Full or Partial Compliance Evaluation):
Partial Compliance Evaluation

PROGRAMMATIC ID: ALJEF0000107300455

PERMIT NUMBER: Permit # 4-07-0455-05

EPA Region 4 Investigator(s)/Inspector(s):
Sharron Porter, Environmental Engineer
Rosalyn Hughes-Fairley, Environmental Engineer
Kevin Taylor, Environmental Engineer

State/Local Investigator(s)/Inspector(s):
Riley Smith, Air Pollution Control Engineer, Air and Radiation Protection
Division, Jefferson County Department of Health (JCDH)

Person(s) Contacted at Facility (Name and Title):
1. Blake Williams, Director, Plant Operations
2. Ron Bombard, Environmental Health, and Safety Manager

Report Prepared by: Sharron Porter

FACILITY INFORMATION

A. Facility and Permit Information

Facility and Permit Information	Comments
1. Type of facility (e.g., chemical plant, refinery, cement manufacturer, etc.).	Manufacturing and Surface Coating of Metal Pipe and Pipe Fittings
2. Air permit number(s) and type of permit (e.g., Title V, PSD, Synthetic Minor, etc.).	Permit # 4-07-0455-05
3. Air permit issuance date.	October 2, 2020
4. Air permit expiration date.	October 1, 2025
5. Facility classification (Major, Synthetic Minor/Conditional Major, Minor).	Major
6. Major source pollutants (if applicable).	Hazardous Air Pollutants (HAPs)
7. Applicable regulations (e.g., State Implementation Plan, MACT Subpart FFFF, NSPS Subpart EEEE, etc.).	40 C.F.R. Part 63, Subpart MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products
8. Types of air emission points (e.g., tanks, process vents, boilers, etc.).	Release of HAPs during the coating.
9. Types of air pollution control equipment (e.g., baghouse, scrubber, afterburner, etc.).	N/A

B. Process Description

C & B Piping is a fabrication shop that primarily manufactures metal pipe and pipe fitting from purchased new metal pipe and fittings. Metal pipes and pipe fittings are manufactured by processes such as cutting, threading, bending and painting. The pipe and fittings are brought to the facility via truck. They are cleaned using sand before the

application of any surface coatings. C & B Piping operates one ten-hour shifts per day, and one eight-hour shift, 5 days a week. There are 125 – 140 employees. C & B Piping builds specialty and custom pipes to order for water and wastewater treatment facilities. C & B Piping has not made any major modifications or expansions to the process in the last eighteen to twenty-four months.

II. INSPECTION ACTIVITIES

Activity	Yes No NA	Comments
Opening Meeting		
1. Date and time entered the facility.	Y	The EPA Region 4 inspection team and JCDH inspector arrived at the facility on March 8, 2023, at 9:08 AM EST.
2. Credentials presented to facility personnel (include name and title).	Y	Upon arrival, EPA inspectors presented credentials to Blake Williams and Ron Bombard.
3. Conducted an opening meeting to explain the purpose and objectives of the inspection.	Y	The team held an opening conference with Blake Williams and Ron Bombard to discuss the purpose of the inspection. The Team stated the inspection would consist of an opening conference, physical walk thru, records review and closing conference.
4. Discussed safety issues.	Y	The team discussed appropriate personal protective equipment prior to going to process areas.
5. Discussed which records to be reviewed.	N	The team reviewed documents related to compliance with Subpart MMMM. A list of documents reviewed can be found in Item 10 of this report.
6. Discussed the facility walk-through and the areas to be observed in the facility.	Y	The team discussed the surface coating process, from raw materials to finished product. All surface coating process areas of the facility were observed.

Activity	Yes No NA	Comments
7. Discussed facility policy regarding photographs or video (if applicable).	N/A	The team did not bring video or photograph equipment.
8. Discussed the use of the infrared camera, TVA, PID, and any other equipment.	N/A	
9. Discussed CBI.	Y	The team indicated that any material claimed to be Confidential Business Information (CBI) would be treated in accordance with regulations.
Records Reviewed at the Facility		

Activity	Yes No NA	Comments
10. The types of records reviewed, and the time period reviewed.	Y	The inspection team reviewed the records listed below on site during the inspection: Records reviewed during the inspection: 1. Title V Air Quality Permit 2. Title V Annual Compliance Certification dated February 17, 2023 3. Semi-Annual Report dated January 18, 2023 4. 2020 Paint and Solvent Usage Report 5. Monthly calculations of each 12-month rolling average for HAPs (dating back to 2013) 6. Waste Manifest Certificate of Compliance and Disposal dated January 11, 2023 (Giant Resource Recovery out of Attala, Alabama). This manifest was for Red Primer 7. Records of paint usage (daily paint logs) from 27, 2023, to March 3, 2023. This information was kept in an Excel spreadsheet. Five years of data was available for review. 8. C & B Piping, Inc. indicated that they would email the Safety Data Sheets to USEPA, Region 4 for the Asphalt Coatings, the Temporary Shop Coating, and the thinners. USEPA received this information on March 9, 2023. The inspection team received a copy of the Daily paint logs dated February 27, 2023, to March 3, 2023. This is non-CBI data.
Facility Walk-Through Observations		

11. The process equipment observed and the associated operational rate observed (e.g., Furnace 1 production rate was 5 lbs/hr on 1/1/15, at 2:00 pm – permit requires max rate at 6 lbs/hr). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	Y	Inspection of process areas began at 9:40 am. The inspection team started at the Finish Yard, where inventory was stored until it is shipped. The Fitting Room was viewed next. During the inspection, connectors were being worked on. The team observed pipe being coated with red primer (Temporary Shop Coating) via spray guns. There were two main paint rooms/areas. Paint is applied at the facility by brushes, rollers, and spray guns. It is also applied by hand, but that process is very labor intensive. After a piece of pipe is coated, it is air dried. There are no controls for drying. After drying occurs, the pipe is labelled and moved to the Finish Yard for shipping. C & B Piping purchases 90% of its paint in 5-gallon buckets by truck. 10% of the paint comes in 55-gallon drums. Paint is purchased from Sherwin Williams, Induron and Tnemec, at a minimum of 3 times per week. Paint is stored in the storage area until needed. There are two main coatings that are used in the process: Asphalt coating and Temporary Shop Coating. C & B Piping indicated that all coatings purchased are use and applied. The facility uses some thinners. The Inspection Team viewed the hazardous waste shipments on site (three drums) during the walk thru, as well as the paint sheets for the number of gallons of acetone used. C & B Piping demonstrates compliance with the CAA by emission rate without add-on control option. The facility accounts for coating used at the facility through the “as purchased process”. Material Safety Data Sheets are on file for products distributed. The amount of material used is tracked to maintain compliance with the emissions option in Subpart M MMM.
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Activity	Yes No NA	Comments
		No issues of concern were observed during the process area inspection.
12. The type of process parametric monitoring observed and the associated value observed (e.g., Furnace 1 flux injection rate was 200 lbs/batch at 1/1/15, at 2:00 pm – permit requires max rate at 225 lbs/batch). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
13. If process equipment or parametric monitoring equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	

Activity	Yes No NA	Comments
14. The type of air pollution control equipment, the process equipment it is controlling, and the associated parametric monitoring value observed (e.g., baghouse pressure drop, temperature, scrubber flow rate, etc.). (For example - RTO 1 controlling furnace 1, 1,500 degrees F on 1/1/15, at 2:00 pm – permit requires 1,400 degree F or higher). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	Y	The facility operates a fabric filter control device to control particulate matter and improve indoor air quality. No issues were noted with the control device.

Activity	Yes No NA	Comments
15. Continuous emissions monitoring devices and values observed. (e.g., CEMS, COMs, etc.). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
16. If air pollution control equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	
17. Capture and collection system (enclosures and hoods) observations, if applicable (e.g., the magnitude and duration of emission escaping capture from the hood).	N/A	

Activity	Yes No NA	Comments
18. Ductwork transferring the emissions to the air pollution control device observations, if applicable (e.g., the magnitude and duration of emission escaping from the ductwork, holes or deterioration in ductwork, no deterioration observed, etc.).	N/A	
19. Any existing unpermitted emission points, new unpermitted emission points, or non-permitted construction activities observed. (if yes, describe in the comments field).	N	
20. Were any visible emissions observed? (if yes, identify the location and equipment).	N	No visible emissions were observed during the inspection.
21. Was a Method 9 reading performed? (if yes, identify the location and equipment).	N	
22. Was the cause of the visible emissions investigated and the information documented?	N	

Activity	Yes No NA	Comments
23. Was a Method 22 performed for visible emissions? (if yes, identify the location and equipment).	N	
24. Identify the cause of the visible emissions as explained by facility personnel, if applicable.	N/A	
25. Was the infrared camera used? If so, attach the video log (which includes the equipment ID, and the date and time the video was recorded) and videos to this report.	N	The infrared camera was not used at this facility.

Activity	Yes No NA	Comments
26. Was the TVA used? If so, identify the equipment monitored and the results. Provide the date and time the information was recorded by the inspector. Include actual instrument readings for each piece of equipment monitored above the leak definition and/or where the infrared camera identified a release. An attachment may be used for a large amount of information.	N	A TVA was not used at the facility.
27. Was the PID used? If so, identify how the PID was used and the results. Provide the date and time the information was recorded by the inspector. An attachment may be used for a large amount of information.	N	A PID was not used at the facility.
Closing Meeting		
28. Conducted a closing meeting.	Y	The R4 inspectors conducted a closing meeting on March 8, 2023, at 11:15 AM EST with Ron Bombard, and Riley Smith, JCDH.

Activity	Yes No NA	Comments
29. Summarize any additional information needed, if applicable?	N/A	
30. Accept a declaration of CBI, if applicable?	N/A	
31. Discussed observations.	Y	The inspection team thanked facility staff for their time. The team discussed the facility walkthrough.
32. Discussed next steps, if applicable?	Y	A final inspection report from EPA Region 4 will be sent to the company within a 70-day timeframe.
33. Date and time inspection concluded.		The inspection concluded on March 8, 2023, at 11:30 AM EST.
Miscellaneous		
34. Include any additional observations, if applicable.	N/A	

EPA Investigator/Inspector Signature:

SHARRON PORTER

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EPA Supervisor Signature & Title:

TODD GROENDYKE

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Chief, South Air Enforcement Section