



## Foundry/Corporate Office

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March 6, 2012

Ms. Kathleen Truesdell  
BAAQMD  
939 Ellis Street  
San Francisco, CA 94109

Subject: Comments on Proposed Major Facility Review Permit  
AB&I Foundry (Facility #A0062) – Oakland, CA

Dear Ms. Truesdell:

Please find the following comments regarding the proposed Major Facility Review renewal permit received via Bay Area Air Quality Management District (BAAQMD) letter dated January 23, 2012.

### Table II A – Permitted Sources

1. S-2 Pouring, Cooling, Shakeout: **Make- Didion/Carrier, Model - Varies**
2. S-7 Automatic Pouring Furnace (P2 and P3): **Make – Liquimetrics**
3. S-8 Automatic Pouring Furnace (2013): **Make – Liquimetrics**
4. S-9 Automatic Pouring Furnace (P5 and P6): **Make - Liquimetrics**
5. S-10 Automatic Pouring Furnace (270A): **Make – Liquimetrics**
6. S-25 Holding Furnace: **Make – Linemelt, Model – S-12**
7. S-27 Wheelabrator Shot Blast (No. 3): **Model – Tumblast, Capacity – 50 cubic feet**
8. S-30 Blast Cleaning Product (inline): **Make – BCP/Wheelabrator**

### V. Schedule of Compliance

9. Due to the project schedule for testing that was conducted to estimate emissions of criteria pollutants and toxic air contaminants, samples being broken or lost in transit to the analytical laboratory, and sufficient time to complete the project with appropriate review. ABI is requesting the Schedule of Compliance be changed to match the dates in Table A. [Please see attached sheet \(Table A\)](#)
10. P.111 Cupola **natural gas fired** hot blast was replaced by recuperative hot blast.
11. P.111 Hot blast 350 HP motor was replaced by a 400 HP VFD

**VI. Permit Conditions**

12. p. 121 Condition #13298, 1: add a space between "105 tons" and "during"
13. p. 121 Condition #13298, 2: add a space between "maintained" and "and"
14. p. 124 Condition #24639, Add "For S-34, S-35, S-36, and S-43 Pipe Coating Dip Tanks" under the Condition #
15. p. 125 Condition #24639, 4: Remove "Beginning when the last hot dip tank (s-34, s-35, or s-36) is started up but no later than December 20, 2010." The unit is already installed and the due date has passed.

Please contact me should you have any questions via email at [mike.olvera@abifoundry.com](mailto:mike.olvera@abifoundry.com) or telephone 510-632-3467 x 224.

Sincerely,



Mike Olvera  
Environmental Manager

Attachment: Table A

**TABLE A  
TITLE V PERMIT SCHEDULE OF COMPLIANCE  
AB&I FOUNDRY  
OAKLAND, CA**

<b>LOSS OF EXEMPTION AND AUTHORITY TO CONTRUCT PERMIT APPLICATION DEVELOPMENT</b>			
Title V Citation	Activity	Draft BAAQMD Due Date	Revised BAAQMD Due Date
V.1	Prepare and submit NSR and Title V Application for Automatic Pouring Furnaces (S-7, S-8, S-9 and S-10), Storage Bunker (S-46), Storage Piles (S-47), Slurry Mix Stations (P2-P4)	3/26/2012	4/20/2012
V.2	Prepare and submit NSR and Title V Application for Specialty Finishing Paint Dip Tank (Iron Weights)	3/26/2012	4/20/2012

<b>NSR AND TITLE V PERMIT APPLICATION PREPARATION - DISA AND PIPE MACHINE PROJECT</b>			
Title V Citation	Activity	Draft BAAQMD Due Date	Revised BAAQMD Due Date
V.3.c.i.c	BAE to PTE Calculations (including TACs) for DISA and Pipe Machine Projects	3/26/2012	4/27/2012
V.3.c.i.a	District BACT for DISA and Pipe Machine Project	3/26/2012	5/11/2012
V.3.c.i.d	Project Description Support Document	3/26/2012	5/11/2012
V.3.c.ii	Determine CEQA and PSD analysis for DISA and Pipe Machine Projects	4/9/2012	4/27/2012
V.3.c.iii	NSR and Title V Application for DISA and Pipe Machine Project	5/1/2012	5/11/2012

<b>PSD, NSR AND TITLE V PERMIT APPLICATION PREPARATION - HOT DIP</b>			
Title V Citation	Activity	Draft BAAQMD Due Date	Revised BAAQMD Due Date
V.3.c.i.b	BACT for hot dip tank during prior to last last pipe machine change	3/26/2012	5/11/2012

<b>PSD, NSR AND TITLE V PERMIT APPLICATION PREPARATION - CUPOLA PROJECT</b>			
Title V Citation	Activity	Draft BAAQMD Due Date	Revised BAAQMD Due Date
V.4.i)b.	BAE to PTE Calculations (including TACs) for Cupola Project	3/26/2012	6/8/2012
V.4.i)a.	Top-down BACT analysis for Cupola	3/26/2012	8/1/2012
V.4.i)c.	Project Description Support Document	3/26/2012	8/1/2012
V.4.ii)	Determine Project CEQA and PSD applicability analysis.	4/9/2012	6/8/2012
V.4.iii)	Contact District Staff for guidance on modeling for 40 CFR Part 52.21	4/16/2012	5/18/2012
NA	Submit draft modeling protocol to BAAQMD	4/26/2012	5/25/2012
NA	BAAQMD Response to Draft Modeling Protocol		6/1/2012
V.4.iv)	Submit Progress report to District detailing the PSD application	6/1/2012	7/1/2012
NA	Prepare Air Dispersion Modeling Report		8/1/2012
NA	Complete Additional Impacts Analysis		8/1/2012
V.4.v)	Submit NSR, PSD and Title V Permit Application for Cupola Project	7/1/2012	8/1/2012