

Bay Area Air Quality Management District

939 Ellis Street
San Francisco, CA 94109
(415) 771-6000

Final

MAJOR FACILITY REVIEW PERMIT

Issued To:

**United Spiral Pipe, LLC
Facility #B8478**

Facility Address:
900 East 3rd Street
Pittsburg, CA 94565

Mailing Address:
900 East 3rd Street
Pittsburg, CA 94565

Responsible Official
Larry Taylor,
VP of Operations

Facility Contact
Suzanne Franz,
Manager – EH&S
(925) 526-3124

Type of Facility: Spiral Pipe Manufacturing
Primary SIC: 3498
Product: Large Diameter Steel Pipe

BAAQMD Engineering
Division Contact:
Robert T. Hull

ISSUED BY THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Signed by Jeff McKay for Jack P. Broadbent
Jack P. Broadbent, Executive Officer/Air Pollution Control Officer

June 11, 2012
Date

TABLE OF CONTENTS

I.	STANDARD CONDITIONS.....	3
II.	EQUIPMENT	7
III.	GENERALLY APPLICABLE REQUIREMENTS	8
IV.	SOURCE-SPECIFIC APPLICABLE REQUIREMENTS.....	11
V.	SCHEDULE OF COMPLIANCE.....	16
VI.	PERMIT CONDITIONS	17
VII.	APPLICABLE EMISSION LIMITS & COMPLIANCE MONITORING REQUIREMENTS	20
VIII.	TEST METHODS	22
IX.	PERMIT SHIELD	23
X.	REVISION HISTORY	24
XI.	GLOSSARY	25

I. STANDARD CONDITIONS

A. Administrative Requirements

The permit holder shall comply with all applicable requirements in the following regulations:

BAAQMD Regulation 1 - General Provisions and Definitions
(as amended by the District Board on 5/4/11);

SIP Regulation 1 - General Provisions and Definitions
(as approved by EPA through 6/28/99);

BAAQMD Regulation 2, Rule 1 - Permits, General Requirements
(as amended by the District Board on 4/18/12);

SIP Regulation 2, Rule 1 - Permits, General Requirements
(as approved by EPA through 1/26/99);

BAAQMD Regulation 2, Rule 2 - Permits, New Source Review
(as amended by the District Board on 6/15/05);

SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration
(as approved by EPA through 1/26/99);

BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking
(as amended by the District Board on 12/21/04),

SIP Regulation 2, Rule 4 - Permits, Emissions Banking
(as approved by EPA through 1/26/99),

BAAQMD Regulation 2, Rule 5 – New Source Review of Toxic Air Contaminants
(as amended by the District Board on 1/6/10)

BAAQMD Regulation 2, Rule 6 - Permits, Major Facility Review
(as amended by the District Board on 4/16/03).

SIP Regulation 2, Rule 6 – Permits, Major Facility Review
(as approved by EPA through 6/23/95)

BAAQMD Regulation 2, Rule 9 –Interchangeable Emission Reduction Credits
(as amended by the District Board on 6/15/05)

B. Conditions to Implement Regulation 2, Rule 6, Major Facility Review

1. This Major Facility Review Permit was issued on June 11, 2012 and expires on June 10, 2017. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than December 10, 2017 and no earlier than June 10, 2016. **If a complete application for renewal has not been submitted in accordance with this deadline, the facility may not operate after June 10, 2017.** If the permit renewal has not been issued by June 10, 2017, but a complete application for renewal has been submitted in accordance with the above deadlines, the existing permit will continue in force until the District takes final action on the renewal application. (Regulation 2-6-307, 404.2, 407, & 409.6; MOP Volume II, Part 3, §4.2)
2. The permit holder shall comply with all conditions of this permit. The permit consists of this document and all appendices. Any non-compliance with the terms and conditions of this permit will constitute a violation of the law and will be grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. (Regulation 2-6-307; MOP Volume II, Part 3, §4.11)

I. Standard Conditions

3. In the event any enforcement action is brought as a result of a violation of any term or condition of this permit, the fact that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with such term or condition shall not be a defense to such enforcement action. (MOP Volume II, Part 3, §4.11)
4. This permit may be modified, revoked, reopened and reissued, or terminated for cause. (Regulation 2-6-307, 409.8, 415; MOP Volume II, Part 3, §4.11)
5. The filing of a request by the facility for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated non-compliance does not stay the applicability of any permit condition. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
6. This permit does not convey any property rights of any sort, or any exclusive privilege. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
7. The permit holder shall supply within 30 days any information that the District requests in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. (Regulation 1-441, Regulation 2-6-409.4 & 501; MOP Volume II, Part 3, §4.11)
8. Any records required to be maintained pursuant to this permit that the permittee considers proprietary or trade secret information shall be prominently designated as such. Copies of any such proprietary or trade secret information which are provided to the District shall be maintained by the District in a locked confidential file, provided, however, that requests from the public for the review of any such information shall be handled in accordance with the District's procedures set forth in Section 11 of the District's Administrative Code. (Regulation 2-6-419; MOP Volume II, Part 3, §4.11)
9. Proprietary or trade secret information provided to EPA will be subject to the requirements of 40 CFR Part 2, Subpart B - Public Information, Confidentiality of Business Information. (40 CFR Part 2)
10. The emissions inventory submitted with the application for this Major Facility Review Permit is an estimate of actual emissions or the potential to emit for the time period stated and is included only as one means of determining applicable requirements for emission sources. It does not establish, or constitute a basis for establishing, any new emission limitations. (MOP Volume II, Part 3, §4.11)
11. The responsible official shall certify all documents submitted by the facility pursuant to the major facility review permit. The certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. The certifications shall be signed by a responsible official for the facility. (Regulation 2-6-409.20, MOP Volume II, Part 3, §4.11)

I. Standard Conditions

12. The permit holder is responsible for compliance, and certification of compliance, with all conditions of the permit, regardless whether it acts through employees, agents, contractors, or subcontractors. (Regulation 2-6-307)

C. Requirement to Pay Fees

The permit holder shall pay annual fees in accordance with District Regulation 3, including Schedule P. (Regulation 2-6-402 & 409.13, Regulation 3; MOP Volume II, Part 3, §4.12)

D. Inspection and Entry

Access to Facility: The permit holder shall provide reasonable access to the facility and equipment which is subject to this permit to the APCO and/or to his or her designee. (Regulation 1-440, Regulation 2-6-409.3; MOP Volume II, Part 3, §4.14)

E. Records

1. The permit holder must provide any information, records, and reports requested or specified by the APCO. (Regulation 1-441, Regulation 2-6-409.4)
2. Notwithstanding the specific wording in any requirement, all records for federally enforceable requirements shall be maintained for at least five years from the date of entry. (Regulation 2-6-501, Regulation 3; MOP Volume II, Part 3, §4.7)

F. Monitoring Reports

Reports of all required monitoring must be submitted to the District at least once every six months, except where an applicable requirement specifies more frequent reporting. Monitoring reports shall be prepared for the following periods: July 1st through December 31st and January 1st through June 30th of each year, and are due on the last day of the month after the end of the reporting period. All instances of non-compliance shall be clearly identified in these reports. The reports shall be certified by the responsible official as true, accurate, and complete. In addition, all instances of non-compliance with the permit shall be reported in writing to the District's Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions. The reports shall be sent to the following address:

Director of Compliance and Enforcement
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109
Attn: Title V Reports

(Regulation 2-6-502, Regulation 3; MOP Volume II, Part 3, §4.7)

G. Compliance Certification

Compliance certifications shall be submitted annually by the responsible official of this facility to the Bay Area Air Quality Management District and to the Environmental Protection Agency. The certification period will be July 1st to June 30th. The certification shall be submitted by July 31st of each year. The certification must list each applicable requirement, the compliance status, whether compliance was continuous or intermittent, the method used to determine compliance, and any other

I. Standard Conditions

specific information required by the permit. The permit holder may satisfy this requirement through submittal of District-generated Compliance Certification forms. The certification should be directed to the District's Compliance and Enforcement Division at the address above, and a copy of the certification should be sent to the Environmental Protection Agency at the following address:

Director of the Air Division
USEPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105
Attention: Air-3

(MOP Volume II, Part 3, §4.5 and 4.15)

H. Emergency Provisions

1. The permit holder may seek relief from enforcement action in the event of a breakdown, as defined by Regulation 1-208 of the District's Rules and Regulations, by following the procedures contained in Regulations 1-431 and 1-432. The District will thereafter determine whether breakdown relief will be granted in accordance with Regulation 1-433. (MOP Volume II, Part 3, §4.8)
2. The permit holder may seek relief from enforcement action for a violation of any of the terms and conditions of this permit by applying to the District's Hearing Board for a variance pursuant to Health and Safety Code Section 42350. The Hearing Board will determine after notice and hearing whether variance relief should be granted in accordance with the procedures and standards set forth in Health and Safety Code Section 42350 et seq. (MOP Volume II, Part 3, §4.8)
3. The granting by the District of breakdown relief or the issuance by the Hearing Board of a variance will not provide relief from federal enforcement. (MOP Volume II, Part 3, §4.8)

I. Severability

In the event that any provision of this permit is invalidated by a court or tribunal of competent jurisdiction, or by the Administrator of the EPA, all remaining portions of the permit shall remain in full force and effect. (Regulation 2-6-409.5; MOP Volume II, Part 3, §4.10)

J. Miscellaneous Conditions

The maximum capacity for each source as shown in Table II-A is the maximum allowable capacity. Exceedance of the maximum allowable capacity for any source is a violation of Regulation 2, Rule 1, Section 301. (Regulation 2-1-301)

II. EQUIPMENT

Table II-A - Permitted Sources

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-301.

S-#	Description	Make or Type	Model	Capacity
S-2	Inside Pipe Cleaning	Atis		300,000 tons/year
S-8	Pipe Inside Suction	Atis		300,000 tons/year
S-10	External Coating – Abrasive Blasting	Atis		188 tons/hour
S-11	External Coating – Fusion Bonded Epoxy	Atis		364 tons/hour
S-16	Wipe Cleaning – Facility Wide			

Table II-B – Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Required Efficiency
A-2	Pulse Jet Baghouse	2	BACT	Pressure drop	0.006 gr/dscf
A-12	Cyclone Separator	8	N	N	N/A
A-13	Pulse Jet Baghouse	8	BACT	Pressure drop	0.006 gr/dscf
A-14	Cyclone Separator	10	N	N	N/A
A-15	Pulse Jet Baghouse	10	BACT	Pressure drop	0.006 gr/dscf
A-16	Cyclone Separator	11	N	N	N/A
A-17	Pulse Jet Baghouse	11	BACT	Pressure drop	0.006 gr/dscf

III. GENERALLY APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. These requirements apply in a general manner to the facility and/or to sources exempt from the requirement to obtain a District Permit to Operate. The District has determined that these requirements will not be violated under normal, routine operations, and that no additional periodic monitoring or reporting to demonstrate compliance is warranted. In cases where a requirement, in addition to being generally applicable, is also specifically applicable to one or more sources, the requirement and the source are also included in Section IV, Source-Specific Applicable Requirements, of this permit. This section also contains provisions that may apply to temporary sources.

The dates in parentheses in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s):
 The date(s) of adoption or most recent amendment of the regulation by the District Board of Directors.
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP:
 The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full language of SIP requirements are available on the EPA Region 9 website. The address is:

<http://yosemite.epa.gov/r9/r9sips.nsf/Agency?ReadForm&count=500&state=California&cat=Bay+Area+Air+Quality+Management+District-Agency-Wide+Provisions>.

NOTE:

There are differences between the current BAAQMD rules and the version of the rules in the SIP. All sources must comply with both versions of the rule until US EPA has reviewed and approved the District’s revision of the regulation.

**Table III
 Generally Applicable Requirements**

Applicable Requirement	Regulation Title or Description of Requirement	FE Federally Enforceable (Y/N)
BAAQMD Regulation 1	General Provisions and Definitions (5/4/11)	N
SIP Regulation 1	General Provisions and Definitions (8/27/99)	Y
BAAQMD Regulation 2, Rule 1	General Requirements (4/18/12)	N
BAAQMD 2-1-429	Federal Emissions Statement (12/21/04)	N

III. General Applicable Requirements

**Table III
 Generally Applicable Requirements**

Applicable Requirement	Regulation Title or Description of Requirement	FE Federally Enforceable (Y/N)
SIP Regulation 2, Rule 1	General Requirements (1/26/99)	Y
SIP Regulation 2-1-429	Federal Emissions Statement (4/3/95)	Y
BAAQMD Regulation 2, Rule 5	New Source Review of Toxic Air Contaminants (1/6/10)	N
BAAQMD Regulation 4	Air Pollution Episode Plan (3/20/91)	N
SIP Regulation 4	Air Pollution Episode Plan (8/06/90)	Y
BAAQMD Regulation 5	Open Burning (3/6/02)	N
SIP Regulation 5	Opening Burning (9/4/98)	Y
BAAQMD Regulation 6, Rule 1	Particulate Matter - General Requirements (12/5/07)	N
SIP Regulation 6	Particulate Matter and Visible Emissions (9/4/98)	Y
BAAQMD Regulation 7	Odorous Substances (3/17/82)	N
BAAQMD Regulation 8, Rule 1	Organic Compounds - General Provisions (6/15/94)	Y
BAAQMD Regulation 8, Rule 2	Organic Compounds - Miscellaneous Operations (7/20/05)	N
SIP Regulation 8, Rule 2	Organic Compounds – Miscellaneous Operations (3/22/95)	Y
BAAQMD Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (11/21/01)	Y
BAAQMD Regulation 8, Rule 4	Organic Compounds – General Solvent and Surface Coating Operations (10/16/02)	Y
BAAQMD Regulation 8, Rule 40	Organic Compounds – Aeration of Contaminated Soil and Removal of Underground Storage Tanks (6/15/05)	N
SIP Regulation 8, Rule 40	Organic Compounds - Aeration of Contaminated Soil and Removal of Underground Storage Tanks (4/19/01)	Y
BAAQMD Regulation 8, Rule 47	Organic Compounds – Air Stripping and Soil Vapor Extraction Operations (6/15/05)	N
SIP Regulation 8, Rule 47	Organic Compounds - Air Stripping and Soil Vapor Extraction Operations (4/26/95)	Y
BAAQMD Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (12/20/95)	N
SIP Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (3/22/95)	Y
BAAQMD Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (7/12/02)	N

III. General Applicable Requirements

**Table III
 Generally Applicable Requirements**

Applicable Requirement	Regulation Title or Description of Requirement	FE Federally Enforceable (Y/N)
SIP Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (2/26/02)	Y
BAAQMD Regulation 9, Rule 1	Inorganic Gaseous Pollutants - Sulfur Dioxide (3/15/95)	N
SIP Regulation 9, Rule 1	Inorganic Gaseous Pollutants - Sulfur Dioxide (6/8/99)	Y
BAAQMD Regulation 9, Rule 2	Inorganic Gaseous Pollutants - Hydrogen Sulfide (3/17/82)	N
BAAQMD Regulation 11, Rule 2	Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (10/7/98)	N
BAAQMD Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (7/11/90)	N
SIP Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (9/2/81)	Y
California Health and Safety Code Section 41750 et seq.	Portable Equipment	N
California Health and Safety Code Section 44300 et seq.	Air Toxics "Hot Spots" Information and Assessment Act of 1987	N
California Health and Safety Code Title 17, Section 93115	Airborne Toxic Control Measure for Stationary Compression Ignition Engines	N
California Health and Safety Code Title 17, Section 93116	Airborne Toxic Control Measure for Diesel Particulate Matter from Portable Engines Rated at 50 Horsepower and Greater	N
40 CFR Part 61, Subpart M	National Emission Standards for Hazardous Air Pollutants – National Emission Standard for Asbestos (6/19/95)	Y

IV. SOURCE-SPECIFIC APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. The requirements cited in the following tables apply in a specific manner to the indicated source(s).

The dates in parentheses in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s):
 The date(s) of adoption or most recent amendment of the regulation by the District Board of Directors
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date.

The full text of each permit condition cited is included in Section VI, Permit Conditions, of this permit. The full language of SIP requirements is on EPA Region 9’s website. The address is

<http://yosemite.epa.gov/r9/r9sips.nsf/Agency?ReadForm&count=500&state=California&cat=Bay+Area+Air+Quality+Management+District-Agency-Wide+Provisions.>

Table IV-A
Source Specific Applicable Requirements
S-2: Pipe Inside Cleaning Machine
S-8: Pipe Inside Suction Machine
S-10: External Coating – Abrasive Blasting

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 6, Rule 1	Particulate Matter - General Requirements (12/5/07)		
6-1-310	Particulate Weight Limitation	N	
SIP Regulation 6	Particulate Matter and Visible Emissions (9/4/98)		
6-310	Particulate Weight Limitation	Y	
40 CFR 64	Compliance Assurance Monitoring (10/22/97)		
64.1	Definitions	Y	
64.2	Applicability	Y	
64.3	Monitoring design criteria	Y	
64.4	Submittal requirements	Y	

IV. Source-Specific Applicable Requirements

Table IV-A
Source Specific Applicable Requirements
S-2: Pipe Inside Cleaning Machine
S-8: Pipe Inside Suction Machine
S-10: External Coating – Abrasive Blasting

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
64.5	Deadlines for submittals	Y	
64.6	Approval of monitoring	Y	
64.7	Operation of approved monitoring	Y	
64.8	Quality improvement plan (QIP) requirements	Y	
64.9	Reporting and recordkeeping requirements	Y	
64.10	Savings provisions	Y	
BAAQMD Condition #23815	Facility-Wide Operating Conditions		
Part 1	Production capacity limits and records (Regulation 2-1-234)	Y	
Part 2	Combined “facility” operations for federal requirements (Regulations 2-1-213, 2-2-215, 2-6-206)	Y	
Part 3	Cargo carrier emissions (Regulation 2-1-403)	Y	
BAAQMD Condition #23816	Conditions for Sources Abated by Baghouses		
Part 1	Requirement for proper baghouse operation (Regulation 2-1-403, CAM)	Y	
Part 2	Baghouse outlet grain loading limit (BACT, Cumulative Increase)	Y	
Part 3	Baghouse pressure drop monitoring, acceptable range (Regulation 2-1-403, CAM)	Y	
Part 4	Periodic baghouse monitoring (Regulation 2-1-403, CAM)	Y	
Part 5	Visual inspection of baghouse filters (Regulation 2-1-403, CAM)	Y	
Part 6	Recordkeeping (Regulation 2-6-50, CAM)	Y	
Part 7	Initial source test requirement (BACT, Cumulative Increase, CAM)	Y	

IV. Source-Specific Applicable Requirements

Table IV-B
Source Specific Applicable Requirements
S-11: External Coating – Fusion Bonded Epoxy

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 6, Rule 1	Particulate Matter - General Requirements (12/5/07)		
6-1-310	Particulate Weight Limitation	N	
SIP Regulation 6	Particulate Matter and Visible Emissions (9/4/98)		
6-310	Particulate Weight Limitation	Y	
BAAQMD Regulation 8, Rule 19	Surface Preparation and Coating of Miscellaneous Metal Parts and Products (10/16/02)		
8-19-302.1	Baked Coatings – VOC Limit	Y	
8-19-501	Records	Y	
40 CFR 64	Compliance Assurance Monitoring (10/22/97)		
64.1	Definitions	Y	
64.2	Applicability	Y	
64.3	Monitoring design criteria	Y	
64.4	Submittal requirements	Y	
64.5	Deadlines for submittals	Y	
64.6	Approval of monitoring	Y	
64.7	Operation of approved monitoring	Y	
64.8	Quality improvement plan (QIP) requirements	Y	
64.9	Reporting and recordkeeping requirements	Y	
64.10	Savings provisions	Y	
BAAQMD Condition #23815	Facility-Wide Operating Conditions		
Part 1	Production capacity limits and records (Regulation 2-1-234)	Y	
Part 2	Combined “facility” operations for federal requirements (Regulations 2-1-213, 2-2-215, 2-6-206)	Y	
Part 3	Cargo carrier emissions (Regulation 2-1-403)	Y	
BAAQMD Condition 23816	Conditions for Sources Abated by Baghouses		

IV. Source-Specific Applicable Requirements

Table IV-B
Source Specific Applicable Requirements
S-11: External Coating – Fusion Bonded Epoxy

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
Part 1	Requirement for proper baghouse operation (Regulation 2-1-403, CAM)	Y	
Part 2	Baghouse outlet grain loading limit (BACT, Cumulative Increase)	Y	
Part 3	Baghouse pressure drop monitoring, acceptable range (Regulation 2-1-403, CAM)	Y	
Part 4	Periodic baghouse monitoring (Regulation 2-1-403, CAM)	Y	
Part 5	Visual inspection of baghouse filters (Regulation 2-1-403, CAM)	Y	
Part 6	Recordkeeping (Regulation 2-6-50, CAM)	Y	
Part 7	Initial source test requirement (BACT, Cumulative Increase, CAM)	Y	
BAAQMD Condition #23817	Coating Conditions for S-11		
Part 1	Annual coating usage limit (Cumulative Increase)	Y	
Part 2	Coating VOC limit (Cumulative Increase)	Y	
Part 3	Overspray abatement requirement (Cumulative Increase, Regulations 6-301 and 6-310)	Y	
Part 4	Recordkeeping (Cumulative Increase, Regulation 2-6-501)		

Table IV-C
Source Specific Applicable Requirements
S-16: Wipe Cleaning Operation – Facility Wide

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8, Rule 16	Solvent Cleaning Operations (08/16/02)		
8-16-111	Exemption, Wipe Cleaning	Y	
8-16-501.3	Solvent Records	Y	
BAAQMD Condition #23819	Wipe Cleaning		

IV. Source-Specific Applicable Requirements

Table IV-C
Source Specific Applicable Requirements
S-16: Wipe Cleaning Operation – Facility Wide

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
Part 1	Solvent usage limit (Cumulative Increase)	Y	
Part 2	Solvent Loss Minimization (Regulation 2-1-403)	Y	
Part 3	Recordkeeping (Regulation 2-6-501)	Y	

V. SCHEDULE OF COMPLIANCE

The permit holder shall comply with all applicable requirements cited in this permit. The permit holder shall also comply with applicable requirements that become effective during the term of this permit on a timely basis.

VI. PERMIT CONDITIONS

Condition #23815

Facility-Wide Operating Conditions: United Spiral Pipe, LLC

1. United Spiral Pipe LLC (USP) is permitted for a spiral pipe production capacity of 300,000 tons. The facility shall maintain records of operation and production, summarized on a monthly basis and available for inspection upon request. Any increase of production capacity will be considered a modification of each affected source and will subject the permit holder to all applicable requirements of BAAQMD Regulation 2 "Permits". (basis: Regulation 2-1-234)
2. By definition, United Spiral Pipe (Plant# 18478) and USS-POSCO Industries (UPI) (Plant# 2371) are considered to be the same "facility" for the purpose of determining the applicability and implementation of federally enforceable requirements such as Offsets, Prevention of Significant Deterioration (PSD), and Major Facility Review (Title V). (basis: Regulations 2-1-213, 2-2-215, and 2-6-206)
3. All shared cargo carrier emissions from the combined USP/UPI facility shall be assigned to UPI, P#2371 and subject to Permit Condition #7216. (basis: Regulation 2-1-403)

Condition #23816

General Conditions for PM Sources Abated by Baghouses A-2, A-13, A-15, and A-17 (S-2, S-8, S-10, S-11)

1. The Pulse Jet Baghouses A-2, A-13, A-15, and A-17 shall be properly maintained and properly operated at all times that its associated PM emissions source(s) is/are in operation. (basis: Regulation 2-1-403, CAM)
2. Outlet grain loading at each baghouse shall not exceed 0.006 grains per dry standard cubic foot (gr/dscf). (basis: BACT, Cumulative Increase)
3. All Baghouses shall be equipped with a magnahelic gauge or other approved device to measure the pressure drop across the filter bags. The acceptable pressure drop range for each baghouse has been established by the facility as 10 to 30 inches of water. Baghouses shall not be operated outside this range. (basis: Regulation 2-1-403, CAM)
4. In order to ensure the proper operation of each baghouse, the following items shall be inspected on at least a daily basis. (basis: Regulation 2-1-403, CAM)
 - a. the measured pressure drop across the baghouse is within the established pressure drop range
 - b. evidence of visible particulate emissions from the exhaust of the baghouse

VI. Permit Conditions

5. If a baghouse is found to be operating outside of the established pressure drop range or if there is evidence of visible particulate emissions from the exhaust of the baghouse, a visual inspection of the filter bags shall be conducted. Filter bags exhibiting holes, tearing, or significant wear shall be replaced. After any corrective action has been taken, the baghouse shall be re-inspected in accordance with part 4. (basis: Regulation 2-1-403, CAM)
6. In order to demonstrate compliance with parts 4 and 5, the permit holder shall keep daily inspection records for each baghouse in a District approved log. These records shall include the following information:
 - a. the time and date of each inspection
 - b. the name of the person conducting the inspection
 - c. the measured pressure drop versus the established pressure drop range
 - d. the results of each visible particulate emissions check
 - e. the observed condition of the filter bags when a visual inspection is performed
 - f. any corrective action taken as a result of the inspectionAll records shall be kept on-site and made available for District inspection for a period of five years from the date on which a record is made. (basis: Regulation 2-6-501, CAM)
7. Initial source test requirement: In order to demonstrate initial compliance with part 2, the Permit Holder shall conduct a District approved source test of each baghouse (A-2, A-13, A-15, and A-17) within 60 days of startup. All testing shall be performed in accordance with Volume V of the District's Manual of Procedures and shall be approved in advance by the District's Source Test Section. Source test results shall be provided to the District within 60 days of the test date. (basis: BACT, Cumulative Increase, CAM)

Condition #23817

External Epoxy Coating: S-11

1. The total amount of epoxy coating applied at S-11 shall not exceed 364 tons during any consecutive 12-month period. (basis: Cumulative Increase)
2. The total amount of volatile organic compounds (VOC) present in the epoxy powder coating shall not exceed 1% by weight. (basis: Cumulative Increase)
3. Powder overspray from this source shall be collected/abated by the Cyclone A-16 and Baghouse A-17 (arranged in series) at all times when powder coating is being applied. (basis: Cumulative Increase, Regulation 6-310)
4. In order to demonstrate compliance with parts 1 and 2, the permit holder shall maintain the following records:
 - a. the total amount of powder coating used, summarized on a monthly basis

VI. Permit Conditions

- b. a product data sheet for each coating applied, demonstrating that the VOC is equal to or less than 1% by weight

Records shall be kept on site for at least 5 years from the date of entry and shall be made available for inspection by District personnel upon request. (basis: Cumulative Increase, Regulation 2-6-501)

Condition #23819

Facility-Wide Wipe Cleaning: S-16

1. The total amount of organic solvents used at Wipe Cleaning Operation S-16 shall not exceed 1,000 gallons during any consecutive 12-month period. (basis: Cumulative Increase)
2. In order to minimize solvent losses all organic cleaning solvents and all solvent impregnated cloths or papers not in active use shall be kept in closed containers. (basis: Regulation 2-1-403)
3. To demonstrate compliance with Condition Number 1, the permit holder shall maintain the following records in a District approved log:
 - a. A list of types and/or product names of all materials used for wipe cleaning. For each material, record the VOC content in pounds of VOC per gallon of product.
 - b. Keep monthly records of the type and amount (in gallons) of each material used at S-16.

Records shall be kept on site for at least 5 years from the date of entry and shall be made available for inspection by District personnel upon request. (basis: Cumulative Increase, Regulation 2-6-501)

VII. APPLICABLE EMISSION LIMITS & COMPLIANCE MONITORING REQUIREMENTS

This section has been included only to summarize the applicable emission limits contained in Section IV, Source-Specific Applicable Requirements, of this permit. The following tables show the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency column indicates whether periodic (P) or continuous (C) monitoring is required. For periodic monitoring, the frequency of the monitoring has also been shown, using the following codes: annual (A), quarterly (Q), monthly (M), daily (D), or on an event basis (E). No monitoring (N) has been required if the current applicable rule or regulation does not require monitoring, and the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

This section is only a summary of the limits and monitoring requirements. In the case of a conflict with any requirement in Sections I-VI, the preceding sections take precedence over Section VII.

Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S-2: Pipe Inside Cleaning Machine
S-8: Pipe Inside Suction Machine
S-10: External Coating – Abrasive Blasting

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
FP	BAAQMD 6-310	Y		0.15 gr/dscf	BAAQMD Condition #23816, Parts 3 & 4	P/D	Baghouse pressure drop monitoring and records
FP	BAAQMD Condition 23816, Part 2	Y		0.006 gr/dscf	BAAQMD Condition #23816, Parts 3, 4, & 7	I, P/D	Initial source test; and Baghouse pressure drop monitoring and records
Permitted Pipe Production Capacity	BAAQMD Condition 23815, Part 1	Y		300,000 tons/yr	BAAQMD Condition #23815, Part 1	P/M	Records

VII. Applicable Emission Limits & Compliance Monitoring Requirements

Table VII-B
Applicable Limits and Compliance Monitoring Requirements
S-11: External Coating – Fusion Bonded Epoxy

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
FP	BAAQMD 6-310	Y		0.15 gr/dscf	BAAQMD Condition #23816, Parts 3 & 4	P/D	Baghouse pressure drop monitoring and records
FP	BAAQMD Condition 23816, Part 2	Y		0.006 gr/dscf	BAAQMD Condition #23816, Parts 3, 4, & 7	I, P/D	Initial source test; and Baghouse pressure drop monitoring and records
VOC	BAAQMD 8-19-302.1	Y		275 grams/liter (2.3 lb/gal)	BAAQMD 8-19-501	P	Coating VOC records
VOC	BAAQMD Condition 23817, Part 2	Y		≤ 1% by weight	BAAQMD Condition #23817, Part 4	P	Product data sheets
Usage	BAAQMD Condition 23817, Part 1	Y		364 tons of coating in any consecutive 12-month period	BAAQMD Condition #23817, Part 4	P/M	Usage records

Table VII-C
Applicable Limits and Compliance Monitoring Requirements
S-16: Wipe Cleaning Operation – Facility Wide

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Usage	BAAQMD Condition 23819, Part 1	Y		1,000 gal/yr	BAAQMD Condition #23819, Part 1	P/M	Usage records

VIII. TEST METHODS

The test methods associated with the emission limit of a District regulation are generally referenced in Section 600 et seq. of the regulation. The following table indicates only the test methods associated with the emission limits referenced in Section VII - Applicable Emission Limits & Compliance Monitoring Requirements, of this permit.

Table VIII
Test Methods

Applicable Requirement	Description of Requirement	Acceptable Test Methods
BAAQMD 6-310	Particulate Weight Limitation	Manual of Procedures, Volume IV, ST-15, Particulate
BAAQMD 8-19-302.1	VOC Limit for Baked Coatings	Manual of Procedures, Volume III, Method 21 or 22
BAAQMD Condition 23816, Part 2	Particulate Weight Limitation	Manual of Procedures, Volume IV, ST-15, Particulate

IX. PERMIT SHIELD

Not applicable

X. REVISION HISTORY

Initial Issuance: (Application number 23464)

June 11, 2012

XI. GLOSSARY

ACT

Federal Clean Air Act

BAAQMD

Bay Area Air Quality Management District

BACT

Best Available Control Technology

Basis

The underlying authority which allows the District to impose requirements.

CAA

The federal Clean Air Act

CAAQS

California Ambient Air Quality Standards

CEQA

California Environmental Quality Act

CFR

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

CO

Carbon Monoxide

Cumulative Increase

The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Used to determine whether threshold-based requirements are triggered.

District

The Bay Area Air Quality Management District

EPA

The federal Environmental Protection Agency.

Excluded

Not subject to any District Regulations.

FE, Federally Enforceable,

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60 (NSPS), Part 61 (NESHAPs), Part 63 (HAP), and Part 72 (Permits Regulation, Acid Rain), and also including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

XI. Glossary

FP

Filterable Particulate as measured by BAAQMD Method ST-15, Particulate.

GLC

Ground Level Concentration

HAP

Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by 40 CFR Part 63.

Major Facility

A facility with potential emissions of regulated air pollutants greater than or equal to 100 tons per year, greater than or equal to 10 tons per year of any single hazardous air pollutant, and/or greater than or equal to 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity as determined by the EPA administrator.

MFR

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Act and implemented by District Regulation 2, Rule 6.

MOP

The District's Manual of Procedures.

NAAQS

National Ambient Air Quality Standards

NESHAPs

National Emission Standards for Hazardous Air Pollutants. See 40 CFR Part 61.

NMHC

Non-methane Hydrocarbons

NO_x

Oxides of nitrogen.

NSPS

Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Act, and implemented by both 40 CFR Part 60 and District Regulation 10.

NSR

New Source Review. A federal program for preconstruction review and permitting of new and modified sources of air pollutants for which criteria have been established in accordance with Section 109 of the Federal Clean Air Act. Mandated by Title I of the Clean Air Act and implemented by 40 CFR Parts 51 and 52 as well as District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

XI. Glossary

Offset Requirement

A New Source Review requirement to provide federally enforceable emission offsets at a specified ratio for the emissions from a new or modified source. Applies to emissions of POC, NO_x, PM₁₀, and SO₂.

Phase II Acid Rain Facility

A facility that generates electricity for sale through fossil-fuel combustion and is not exempted by 40 CFR 72 from Titles IV and V of the Clean Air Act.

POC

Precursor Organic Compounds

PM

Particulate Matter

PM₁₀

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

PSD

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

RMP

Risk Management Plan, as defined in 40 CFR Part 68.

SIP

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Ambient Air Quality Standards. Mandated by Title I of the Act.

SO₂

Sulfur dioxide

THC

Total Hydrocarbons (NMHC + Methane)

Title V

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

TOC

Total Organic Compounds (NMOC + Methane, Same as THC)

TPH

Total Petroleum Hydrocarbons

XI. Glossary

TRMP

Toxic Risk Management Plan

TSP

Total Suspended Particulate

VOC

Volatile Organic Compounds

Units of Measure:

bhp	=	brake-horsepower
Btu	=	British Thermal Unit
g	=	grams
gal	=	gallon
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m ²	=	square meter
min	=	minute
MM	=	million
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year