

# Bay Area Air Quality Management District

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

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**Final**

## MAJOR FACILITY REVIEW PERMIT

**Issued To:**  
**AB&I Foundry**  
**Facility #A0062**

**Facility Address:**  
7825 San Leandro Street  
Oakland, CA 94621

**Mailing Address:**  
7825 San Leandro Street  
Oakland, CA 94621

**Responsible Official**  
Kurt Winter,  
General Manager  
510-632-3467

**Facility Contact**  
Mike Olvera,  
Environmental Manager  
510-632-3467

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**Type of Facility:** Grey Iron Foundry  
**Primary SIC:** 3321  
**Product:** Cast iron pipe and fittings

**BAAQMD Permit Division Contact:**  
Faye Bruno

**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

April 13, 2012 \_\_\_\_\_  
Date

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## 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 07/09/2008);
- SIP Regulation 1 - General Provisions and Definitions  
(as approved by EPA through 06/28/1999);
- BAAQMD Regulation 2, Rule 1 - Permits, General Requirements  
(as amended by the District Board on 8/1/01);
- SIP Regulation 2, Rule 1 - Permits, General Requirements  
(as approved by EPA through 2/25/99);
- BAAQMD Regulation 2, Rule 2 - Permits, New Source Review  
(as amended by the District Board on 5/17/00);
- SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration  
(as approved by EPA through 2/25/99);
- BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking  
(as amended by the District Board on 5/17/00);
- SIP Regulation 2, Rule 4 - Permits, Emissions Banking  
(as approved by EPA through 2/25/99);
- BAAQMD Regulation 2, Rule 5 – New Source Review of Toxic Air Contaminants  
(as adopted by the District Board on 6/15/05);
- BAAQMD Regulation 2, Rule 6 - Permits, Major Facility Review  
(as amended by the District Board on 5/2/01); and.
- SIP Regulation 2, Rule 6 – Permits, Major Facility Review  
(as approved by EPA through 6/23/95).

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

1. This Major Facility Review Permit was issued on April 13, 2012, and expires on April 12, 2017. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than October 12, 2017, and no earlier than April 12, 2016. **If a complete application for renewal has not been submitted in accordance with this deadline, the facility may not operate after April 12, 2017.** If the permit renewal has not been issued by April 12, 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 re-issuance, 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 re-issuance, 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 which the permittee considers to contain 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)
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)

## **I. Standard Conditions**

### **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, ; 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. Reports shall be for the following periods: September 1st through February 28<sup>th</sup>, and March 1st through August 31st, 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, 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 March 1st through February 28th. The certification shall be submitted by March 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 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

## **I. Standard Conditions**

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**

1. 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-1	Cupola (coke)	AB&I	None	50 ton/hr 80 MM BTU/hr
S-2	Pouring, Cooling, Shakeout	Didion		143 ton/hr
S-3	Sand Preparation	Simpson	225G (sand muller) MC-150 (sand cooler)	150 ton/hr
S-4	Wheelabrator Shot Blast (No. 1)	Wheelabrator	Tumblast	5 ton/hr
S-5	Pangborn Shot Blast (No. 2)	Pangborn	Rotoblast	5 ton/hr
S-7	Automatic Pouring Furnace (P2 and P3)	Liquimetrics		8,000 lbs
S-8	Automatic Pouring Furnace (2013)	Liquimetrics		8,000 lbs
S-9	Automatic Pouring Furnace (P5 and P6)	Liquimetrics		10,000 lbs
S-10	Automatic Pouring Furnace (270A)	Liquimetrics		10,000 lbs
S-14	Fittings Dip Barrel	AB&I		120 gallons
S-25	Holding Furnace (electric)	Linemelt	S-12	60 ton
S-27	Wheelabrator Shot Blast (No. 3)	Tumbleblast		50 cubic feet
S-28	Storage Silo (Baghouse Dust)	AB&I	None	1,800 cubic feet
S-30	Blast Cleaning Product (Inline)	BCP/Wheelabrator		0.035 tons shot/hr
S-31	Emergency Standby Diesel Generator	Caterpillar	3512	1786 hp
S-32	Flow Jet Pipe Labeler	Matthews	SX/8000	
S-34	Pipe Finishing Dip Tank (P5,P6)	AB&I		114 gallons
S-35	Pipe Finishing Dip Tank (P4)	AB&I		454 gallons
S-36	Pipe Finishing Dip Tank (P2,P3)	AB&I		333 gallons

## 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-43	Pipe Finishing Dip Tank (P1)	AB&I		182 gallons



## II. Equipment

**Table II B - Abatement Devices**

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Emission Limitation
A-14	Baghouse#2	S-2	BAAQMD Reg. 6-1-301	No visible emissions; pressure drop between 2 and 10 inches water column	Ringelmann 1
A-14	Baghouse#2	S-2	BAAQMD Reg. 6-1-310	No visible emissions; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.15 gr/dscf
A-14	Baghouse#2	S-2	BAAQMD Reg. 6-1-311	No visible emissions; pressure drop between 2 and 10 inches water column	$4.10P^{0.67}$ lb/hr, where P is source process weight in ton/hr
A-15	Baghouse#1	S-3	BAAQMD Condition 2237, part 4	No visible emissions; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.04 gr/dscf
A-15	Baghouse#1	S-3	BAAQMD Reg. 6-1-301	No visible emissions; pressure drop between 2 and 10 inches water column	Ringelmann 1
A-15	Baghouse#1	S-3	BAAQMD Reg. 6-1-310	No visible emissions; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.15 gr/dscf
A-15	Baghouse#1	S-3	BAAQMD Reg. 6-1-311	No visible emissions; pressure drop between 2 and 10 inches water column	$4.10P^{0.67}$ lb/hr, where P is source process weight in ton/hr

## II. Equipment

**Table II B - Abatement Devices**

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Emission Limitation
A-17	Baghouse#3	S-4, S-5, S-27, S-30	BAAQMD Reg. 6-1-301	No visible emissions; pressure drop between 2 and 10 inches water column	Ringelmann 1
A-17	Baghouse#3	S-4, S-5, S-27, S-30	BAAQMD Reg. 6-1-310	No visible emissions; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.15 gr/dscf
A-17	Baghouse#3	S-4, S-5, S-27, S-30	BAAQMD Reg. 6-1-311	No visible emissions; pressure drop between 2 and 10 inches water column	$4.10P^{0.67}$ lb/hr, where P is source process weight in ton/hr
A-18	Baghouse#4	S-2	BAAQMD Reg. 6-1-301	No visible emissions; pressure drop between 2 and 10 inches water column	Ringelmann 1
A-18	Baghouse#4	S-2	BAAQMD Reg. 6-1-310	No visible emissions; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.15 gr/dscf
A-18	Baghouse#4	S-2	BAAQMD Reg. 6-1-311	No visible emissions; pressure drop between 2 and 10 inches water column	$4.10P^{0.67}$ lb/hr, where P is source process weight in ton/hr
A-19	Cupola Baghouse	S-1, S-28	40 CFR 63.7690(a)(2)(i)	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.006 gr/dscf

## II. Equipment

**Table II B - Abatement Devices**

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Emission Limitation
A-19	Cupola Baghouse	S-1, S-28	BAAQMD Reg. 6-1-301	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	Ringelmann 1
A-19	Cupola Baghouse	S-1, S-28	BAAQMD Reg. 6-1-310	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.15 gr/dscf
A-19	Cupola Baghouse	S-1, S-28	BAAQMD Reg. 6-1-311	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	$4.10P^{0.67}$ lb/hr, where P is source process weight in ton/hr
A-20	Afterburner # 1, 8 MMBtu/hr	S-1	40 CFR Part 63.7690(a)(8)	1300 degrees F minimum operating temperature, except as provided by 40 CFR 63.7690	20 ppmv VOHAP @ 10% O2
A-21	Baghouse # 5	S-2	40 CFR Part 63.7690(a)(5)(i); Condition # 17097, Part 4	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.01 gr/dscf
A-21	Baghouse # 5	S-2	BAAQMD Reg. 6-1-301	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	Ringelmann 1
A-21	Baghouse # 5	S-2	BAAQMD Reg. 6-1-310	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.15 gr/dscf

## II. Equipment

**Table II B - Abatement Devices**

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Emission Limitation
A-21	Baghouse # 5	S-2	BAAQMD Reg. 6-1-311	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	$4.10P^{0.67}$ lb/hr, where P is source process weight in ton/hr
A-22	Afterburner # 2, 8 MMBtu/hr	S-1	40 CFR Part 63.7690(a)(8)	1300 degrees F minimum operating temperature, except as provided by 40 CFR 63.7690	20 ppmv VOHAP @ 10% O2
A-25	Fume Baghouse	S-25	Condition # 9668, Part 4	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.002 gr/dscf
A-25	Fume Baghouse	S-25	BAAQMD Reg. 6-1-301	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	Ringelmann 1
A-25	Fume Baghouse	S-25	BAAQMD Reg. 6-1-310	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.15 gr/dscf
A-25	Fume Baghouse	S-25	BAAQMD Reg. 6-1-311	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	$4.10P^{0.67}$ lb/hr, where P is source process weight in ton/hr

## II. Equipment

**Table II C – Exempt Sources**

	<b>Description</b>	<b>Exemption Citation BAAQMD Regulation</b>
S-17	12,000 gal Storage Tank (Process Water)	2-1-123.2
S-20	Cold Cleaner, 20 gallons	2-1-118.4
S-23	9,400 gallon Storage Tank (Process Water)	2-1-123.2
S-24	4,900 gallon Storage Tank (Process Water)	2-1-123.2
S-29	Pressure Vessel (Baghouse Dust)	2-1-103.3
S-33	Thinner Tank	2-1-123.3.2
S-37	Hot Oil Heater	2-1-114.1.2
S-38	Vertical Asphalt Storage Tank #1, 10,000 gallons	2-1-123.3.7
S-39	Vertical Asphalt Storage Tank #2, 10,000 gallons	2-1-123.3.7
S-49	Casting Grinding	2-1-121.1

### 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, as applicable. 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 parenthesis 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
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 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>.

**NOTE:**

There are differences between the current BAAQMD rule and the version of the rule 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**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable (Y/N)</b>
BAAQMD Regulation 1	General Provisions and Definitions (05/04/11)	N
SIP Regulation 1	General Provisions and Definitions (06/28/99)	Y
BAAQMD Regulation 2, Rule 1	General Requirements (03/04/09)	N
SIP Regulation 2, Rule 1	General Requirements (1/26/99)	Y
BAAQMD 2-1-429	Federal Emissions Statement (12/21/04)	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 (01/06/2010)	N
BAAQMD Regulation 4	Air Pollution Episode Plan (3/20/91)	N

### III. Generally Applicable Requirements

**Table III**  
**Generally Applicable Requirements**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable (Y/N)</b>
SIP Regulation 4	Air Pollution Episode Plan (8/06/90)	Y
BAAQMD Regulation 5	Open Burning (07/09/08)	N
BAAQMD Regulation 6, Rule 1	Particulate Matter, General Requirements (12/5/07)	N
SIP Regulation 6	Particulate Matter and Visible Emissions (9/04/98)	N
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 (07/01/09)	Y
SIP Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (01/02/04)	Y
BAAQMD Regulation 8, Rule 4	Organic compounds - General Solvent and Surface Coating Operations (10/16/02)	N
BAAQMD Regulation 8, Rule 15	Organic Compounds – Emulsified and Liquid Asphalts (6/01/94)	Y
BAAQMD Regulation 8, Rule 16	Organic Compounds – Solvent Cleaning Operations (10/16/02)	<u>Y</u>
BAAQMD Regulation 8, Rule 40	Organic Compounds - Aeration of Contaminated Soil and Removal of Underground Storage Tanks(6/15/05)	<u>N</u>
SIP Regulation 8, Rule 40	Organic Compounds - Aeration of Contaminated Soil and Removal of Underground Storage Tanks (4/19/01)	<u>Y</u>
BAAQMD Regulation 8, Rule 47	Organic Compounds - Air Stripping and Soil Vapor Extraction Operations(6/15/05)	<u>N</u>
SIP Regulation 8, Rule 47	Organic Compounds - Air Stripping and Soil Vapor Extraction Operations (4/26/95)	<u>Y</u>
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 (07/17/02)	N

### III. Generally Applicable Requirements

**Table III  
 Generally Applicable Requirements**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable (Y/N)</b>
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 (6/08/99)	Y
BAAQMD Regulation 11, Rule 2	Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (10/07/98)	Y
BAAQMD Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (7/11/90)	Y
SIP Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (9/02/81)	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 (07/20/04)	Y
40 CFR Part 64	Compliance Assurance Monitoring (10/22/1997)	Y
40 CFR Part 82	Protection of Stratospheric Ozone (4/13/05)	Y
Subpart F, 40 CFR 82.156	Recycling and Emissions Reductions – Required Practices	Y
Subpart F, 40 CFR 82.161	Recycling and Emissions Reductions – Technician Certification	Y
Subpart F, 40 CFR 82.166	Recycling and Emissions Reductions – Reporting and Recordkeeping Requirements	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 parenthesis 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
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>. All other text may be found in the regulations themselves.

This section summarizes the applicable emission limits contained in Section IV, Source-Specific Applicable Requirements, combined with previous Section VII, Applicable Limits and Compliance Monitoring Requirements. The following tables show the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency indicates whether periodic (P) or continuous (C) monitoring is required. For periodic monitoring, the frequency of the monitoring has also been shown, either annual (A), quarterly (Q), monthly (M), weekly (W), 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.

Monitoring of pressure drop and the use of bag leak detectors is used for monitoring on-going compliance. Operation outside of the listed ranges for pressure drop and bag leak detection systems are reportable compliance activities, which may or may not result in violations.

A column for Recordkeeping, R, has been added to the new Table IV for completeness.

Note: (M#) means EPA Test Method #

#### IV. Source-Specific Applicable Requirements

<b>Table IV - A</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-1 – Cupola abated by A-20, A-22 Afterburner and A-19 Baghouse</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
<b>BAAQMD Regulation 6, Rule 1</b>	<b>Particulate Matter (12/05/07)</b>						
6-1-301	Ringelmann 1.0 Limitation	OPACITY Ringelmann 1.0 < 3 min/hr	63.7740(b); CAM Condition #25039, Part 15	Bag leak detector  C	Once every six months	Y	N
			CAM Condition #25039, Part 21	Pressure drop monitoring  P/D	Once every six months	Y	N
			BAAQMD Condition #9351, Part 11; CAM Condition #25039, Part 27	Source Test  P/Every 5 years	Every 5 years	Y	N
6-1-305	Visible Particles						N
6-1-310	Particulate Weight Limitation	FILTERABLE PARTICULATE 0.15 gr/dscf	63.7740(b); CAM Condition #25039, Part 15	Bag leak detector  C	Once every six months	Y	N
			CAM Condition #25039, Part 21	Pressure drop monitoring  P/D	Once every six months	Y	N
			63.7731(a); 63.7743(a)(12); BAAQMD Condition #9351, Part 11; CAM Condition #25039, Part 27	Source Test  P/Every 5 years	Every 5 years	Y	N

#### IV. Source-Specific Applicable Requirements

<b>Table IV - A</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-1 – Cupola abated by A-20, A-22 Afterburner and A-19 Baghouse</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
6-1-311	General Operations	FILTERABLE PARTICULATE 4.10P <sup>0.67</sup> lb/hr where P is process weight, ton/hr	63.7740(b); CAM Condition #25039, Part 15	Bag leak detector  C	Once every six months	Y	N
			CAM Condition #25039, Part 21	Pressure drop monitoring  P/D	Once every six months	Y	N
			63.7731(a); 63.7743(a)(12); BAAQMD Condition #9351, Part 11; CAM Condition #25039, Part 27	Source Test  P/Every 5 years	Every 5 years	Y	N
6-1-401	Appearance of Emissions						N
6-1-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions						N
<b>SIP Regulation 6</b>	<b>Particulate Matter and Visible Emissions (09/04/98)</b>						
6-301	Ringelmann 1.0 Limitation	OPACITY Ringelmann 1.0 < 3 min/hr	63.7740(b); CAM Condition #25039, Part 15	Bag leak detector  C	Once every six months	Y	Y
			CAM Condition #25039, Part 21	Pressure drop monitoring  P/D	Once every six months	Y	Y
			BAAQMD Condition #9351, Part 11; CAM Condition #25039, Part 27	Source Test  P/Every 5 years	Every 5 years	Y	Y
6-305	Visible Particles						Y

#### IV. Source-Specific Applicable Requirements

Table IV - A Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-1 – Cupola abated by A-20, A-22 Afterburner and A-19 Baghouse							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
6-310	Particulate Weight Limitation	FILTERABLE PARTICULATE 0.15 gr/dscf	63.7740(b); CAM Condition #25039, Part 15	Bag leak detector  C	Once every six months	Y	Y
			CAM Condition #25039, Part 21	Pressure drop monitoring  P/D	Once every six months	Y	Y
			63.7731(a); 63.7743(a)(12); BAAQMD Condition #9351, Part 11; CAM Condition #25039, Part 27	Source Test  P/Every 5 years	Every 5 years	Y	Y
6-311	General Operations	FILTERABLE PARTICULATE 4.10P0.67 lb/hr. where P is process weight, ton/hr	63.7740(b); CAM Condition #25039, Part 15	Bag leak detector  C	Once every six months	Y	Y
			CAM Condition #25039, Part 21	Pressure drop monitoring  P/D	Once every six months	Y	Y
			63.7731(a); 63.7743(a)(12); BAAQMD Condition #9351, Part 11; CAM Condition #25039, Part 27	Source Test  P/Every 5 years	Every 5 years	Y	Y
6-401	Appearance of Emissions						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - A</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-1 – Cupola abated by A-20, A-22 Afterburner and A-19 Baghouse</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
6-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions						Y
<b>BAAQMD Regulation 8, Rule 2</b>	<b>Organic Compounds: Miscellaneous Operations (7/20/2005)</b>						
8-2-301	Miscellaneous Operations	VOC 15 lb/day and 300ppmd	BAAQMD Condition #9351, Part 11	Source Test P/Every 5 years	Every 5 years	Y	Y
8-2-601	Determination of Compliance						Y
<b>BAAQMD Regulation 9, Rule 1</b>	<b>Inorganic Gaseous Pollutants: Sulfur Dioxide (3/15/1995)</b>						
9-1-301	Ground Level Concentration	< 0.5 ppm continuously for 3 consecutive minutes, or 0.25 ppm averaged over 60 consecutive minutes, or 0.05 ppm averaged over 24 hours.		N			Y
9-1-304	Fuel Burning (Liquid and Solid Fuels)	Sulfur content of solid fuel limited to ensure SO <sub>2</sub> ≤ 300 ppmd	BAAQMD Condition #9351, Part 4	Fuel certification; Source test if >1.0% S  P/E	Once every six months	Y	Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - A</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-1 – Cupola abated by A-20, A-22 Afterburner and A-19 Baghouse</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
			BAAQMD Condition #9351, Part 11	Source Test P/Every 5 years	Every 5 years	Y	Y
9-1-601	Sampling and Analysis of Gas Streams						Y
9-1-602	Sulfur Content of Fuels						Y
9-1-603	Averaging Times						Y
<b>BAAQMD Regulation 11, Rule 1</b>	<b>Hazardous Pollutants/ Lead (3/17/82)</b>						
11-1-301	Daily Limitation	LEAD 15 lb/day	BAAQMD Condition #9351, Part 11	Source Test P/Every 5 years	Every 5 years	Y	Y
11-1-302	Ground Level Concentration Limit Without Background	LEAD ≤1.0 ug/m <sup>3</sup>		N			Y
11-1-604	Determination of Daily Emission Limits						N
<b>NESHAP 40 CFR Part 63, Subpart EEEEE</b>	<b>National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries (02/07/2008)</b>						
63.7681	Am I subject to this subpart?						Y
63.7682	What parts of this foundry does this subpart cover?						Y
63.7683(a)	Existing source compliance deadline (April 23, 2007)						Y
63.7683(b)	Existing source compliance deadline for work practice standards (April 22, 2005)						Y
63.7683(f)	Notification and Schedule requirements (63.7750)						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - A</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-1 – Cupola abated by A-20, A-22 Afterburner and A-19 Baghouse</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
63.7690(a)(2)	Emissions Limitations for cupola at existing iron and steel foundry	PM 0.006 gr/dscf; or 0.10 lb PM/ton metal charged; or 0.0005 gr/dscf of total metal HAP; or 0.008 lb of total metal HAP/ton metal charged	63.7740(b)	Bag leak detector C	Once every six months	Y	Y
			63.7740 (b)	Baghouse inspection P/varies			
			63.7731(a); 63.7743(a)(12)	Source Test P/Every 5 years			
63.7690(a)(8)	Emissions Limitations for cupola at existing iron and steel foundry	VOHAP ≤ 20 ppmv @ 10% O2	63.7740(a)	Temperature monitor C	Once every six months	Y	Y
			63.7731(a); 63.7743(a)(12)	Source Test P/Every 5 years	Every 5 years		
63.7690(b)(1)	Install, operate, and maintain a capture and collection system for VOHAP						Y
63.7690(b)(3)	Temperature limit for combustion device applied to emissions from a cupola	Afterburner combustion zone temperature ≥ 1300°F (15-min average, not including 15 min transition from off-blast to on-blast)	63.7740(a)	Temperature monitor C	Once every six months	Y	Y
63.7700	What work practice standards must I meet?						Y
63.7710(a)	Operate and maintain foundry consistent with good air pollution control practices						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - A</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-1 – Cupola abated by A-20, A-22 Afterburner and A-19 Baghouse</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
63.7710(b)	Operation and maintenance plan for each capture and collection system and control device						Y
63.7710(b)(1)	Monthly inspections of abatement equipment						Y
63.7710(b)(2)	Determination of operating limit parameters for each capture system for VOHAP						Y
63.7710(b)(3)	Preventative maintenance plan for each control device						Y
63.7710(b)(4)	Monitoring plan for each bag leak detection system						Y
63.7710(b)(5)	Corrective action plan for each baghouse	Initiate corrective action to determine the cause of the alarm within 1 hour of the alarm, initiate corrective action to correct the cause of the problem within 24 hours	63.7745(a)(4)	Record keeping  P/E	Once every six months	Y	Y
63.7720(a)	General compliance requirements, exemption startup, shutdown, malfunction						Y
63.7720(c)	Develop a written startup, shutdown, and malfunction plan						Y



#### IV. Source-Specific Applicable Requirements

<b>Table IV - A Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements S-1 – Cupola abated by A-20, A-22 Afterburner and A-19 Baghouse</b>							
<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Limit</b>	<b>Monitoring Citation</b>	<b>Monitoring &amp; Frequency</b>	<b>Reporting</b>	<b>R*</b>	<b>FE</b>
63.7730(a)	Initial performance test within 180 days of April 23, 2007	PM or total metal HAP: 63.7690(a)(2); and VOHAP: 63.7690(a)(8)	40 CFR Part 63.7(a)(2)	Initial performance test  P/E	Initial	Y	Y
63.7730(b)	Initial demonstration of compliance with work practice standards and operation and maintenance requirements within 30 days of April 22, 2005						Y
63.7731(a)	Subsequent performance tests for PM or total metal HAP, VOHAP	PM or total metal HAP: 63.7690(a)(2); and VOHAP: 63.7690(a)(8)	63.7731(a)	Source Test  P/Every 5 years	Every 5 years	Y	Y
63.7731(b)	Subsequent performance tests for fugitive emissions from building or structures	Opacity level $\leq$ 20% (6 minute average) 63.7690(a)(7)	63.7731(b)	Visible Emissions (M9)  P/6 months	Once every six months	Y	Y
63.7732	Test Methods						Y
63.7733	Procedures for establishing operating limits						Y
63.7734(a)(2)	Initial compliance demonstration for existing cupola						Y
63.7735	Initial compliance demonstration with work practice standards						Y
63.7736	Initial compliance demonstration with operation and maintenance requirements						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - A            Source-specific Applicable Requirements, Applicable Limits &amp;            Compliance Monitoring Requirements            S-1 – Cupola abated by A-20, A-22 Afterburner and A-19 Baghouse</b>							
<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Limit</b>	<b>Monitoring Citation</b>	<b>Monitoring &amp; Frequency</b>	<b>Reporting</b>	<b>R*</b>	<b>FE</b>
63.7740(a)	Monitoring requirements – for 63.7690(b)(1) VOHAP limit: install, operate and maintain a CPMS						Y
63.7740(b)	Monitoring requirements –for baghouse, use bag leak detection system						Y
63.7740(c)(1)	Monitoring requirements – Baghouse inspection requirements	Pressure drop Normal operating range	63.7740(c)(1)	Pressure drop monitoring  P/D	Once every six months	Y	Y
63.7740(c)(2)	Monitoring requirements – Baghouse inspection requirements	Check dust removal from hoppers	63.7740(c)(2)	Visual inspection  P/W	Once every six months	Y	Y
63.7740(c)(3)	Monitoring requirements – Baghouse inspection requirements	Adequate compressed air supply for pulse-jet baghouses	63.7740(c)(3)	Inspection  P/D	Once every six months	Y	Y
63.7740(c)(4)	Monitoring requirements – Baghouse inspection requirements	Monitor cleaning cycles	63.7740(c)(4)	Inspection  P/A	Once every six months	Y	Y
63.7740(c)(5)	Monitoring requirements – Baghouse inspection requirements	Check bag cleaning mechanisms	63.7740(c)(5)	Visual inspection  P/M	Once every six months	Y	Y
63.7740(c)(7)	Monitoring requirements – Baghouse inspection requirements	Check physical integrity of baghouses interior	63.7740(c)(7)	Visual inspection  P/Q	Once every six months	Y	Y
63.7740(c)(8)	Monitoring requirements – Baghouse inspection requirements	Inspect fans for wear, material buildup, corrosion	63.7740(c)(8)	Visual inspection  P/Q	Once every six months	Y	Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - A</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-1 – Cupola abated by A-20, A-22 Afterburner and A-19 Baghouse</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
63.7740(e)	Monitoring requirement - Combustion device	Monitor 15-minute average combustion zone temperature using a CPMS	63.7740(e)	Temperature monitor C	Once every six months	Y	Y
63.7741(a)(2)	Install, operate, maintain each CPMS for each capture system – pressure measurement device		63.7741(a)(2)	Pressure drop monitor P/M	Once every six months	Y	Y
63.7741(a)(3)	Record results of each inspection, calibration, validation check		63.7741(a)(3)	Record keeping P/E	Once every six months	Y	Y
63.7741(b) (1-5)	Install, operate, maintain a bag leak detection system						Y
63.7741(d) (1,4,6,7,8)	Install, operate, maintain each CPMS to measure and record the combustion zone temperature for each combustion device		63.7741(d)(1,4,6,7,8)	Visual inspection P/M	Once every six months	Y	Y
63.7741(f) (1,2,3)	CPMS requirements						Y
63.7742	Monitoring and collection of data to demonstrate continuous compliance (excluding malfunctions, associated repairs, required quality assurance or control activities)						Y
63.7743(a)(2)	Continuous compliance demonstration for existing cupola	Maintaining the average limits: PM 0.006 gr/dscf; or	63.7740(b)	Bag leak detector C	Once every six months	Y	Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - A</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-1 – Cupola abated by A-20, A-22 Afterburner and A-19 Baghouse</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
		0.10 lb PM/ton metal charged; or 0.0005 gr/dscf of total metal HAP; or 0.008 lb of total metal HAP/ton metal charged	63.7740 (c)	Baghouse inspection P/varies			
			63.7743(a)(12)	Source Test P/Every 5 years			
63.7743(a)(7)	Continuous compliance demonstration for fugitive emissions from building or structures	Opacity level $\leq$ 20% (6 minute average) 63.7690(a)(7)	63.7731(b)	Visible Emissions (M9) P/6 months	Once every six months	Y	Y
63.7743(a)(8)	Continuous compliance demonstration for existing cupola	Maintaining the average limits: VOHAP $\leq$ 20 ppmv @ 10% O <sub>2</sub>	63.7740(a)	Temperature monitor C	Once every six months	Y	Y
			63.7743(a)(12)	Source Test P/Every 5 years	Every 5 years		
63.7743(a)(12)	Continuous compliance demonstration - subsequent performance tests for PM or total metal HAP, VOHAP	PM or total metal HAP: 63.7690(a)(2); and VOHAP: 63.7690(a)(8)	63.7731(a)	Source Test P/Every 5 years	Every 5 years	Y	Y
63.7743(b)	Continuous compliance demonstration – capture system			Static pressure monitor for flow detection  C	Once every six months	Y	Y
63.7743(c)	Continuous compliance demonstration - baghouse			Inspections  P/varies	Once every six months	Y	Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - A</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-1 – Cupola abated by A-20, A-22 Afterburner and A-19 Baghouse</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
63.7743(e)	Continuous compliance demonstration – combustion device			Temperature monitor  C	Once every six months	Y	Y
63.7745(a)(1)	Continuous compliance demonstration – operation and maintenance requirements			Inspections, corrective action, record keeping  P/M	Once every six months	Y	Y
63.7745(a)(2)	Continuous compliance demonstration – Preventative maintenance			Record keeping  P/E	Once every six months	Y	Y
63.7745(a)(3)	Continuous compliance demonstration – bag leak detection system			Record keeping  P/E	Once every six months	Y	Y
63.7745(a)(4)	Continuous compliance demonstration – baghouse corrective action			Record keeping  P/E	Once every six months	Y	Y
63.7745(b)	Maintain operation and maintenance plan onsite						Y
63.7746(a)	Deviations	Report deviations from emissions limitations, work practice standards, and operation and maintenance requirements, including startup, shutdown, malfunction	63.7746(a)	Record keeping  P/E	Once every six months	Y	Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - A</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-1 – Cupola abated by A-20, A-22 Afterburner and A-19 Baghouse</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
63.7746(b)	Startup, shutdown, malfunction deviations are not violations						Y
63.7750	Notification requirements						Y
63.7751	Reporting requirements						Y
63.7752	Recordkeeping requirements						Y
63.7753	Recordkeeping requirements (5 years)						Y
63.7760	Table 1: Applicability of General Provisions (Subpart A)						Y
63.7761	Delegation						Y
63.7765	Definitions						Y
<b>BAAQMD Condition #9351</b>							
Part 1	Minimum A-20, A-22 Afterburners combustion zone Temperature (basis: 40 CFR 63.7690 (b)(3))	Afterburner combustion zone temperature $\geq 1300^{\circ}\text{F}$ (15-min average, not including 15 min transition from off-blast to on-blast)	63.7740(a); BAAQMD Condition #9351, Part 2	Temperature monitor  C	Once every six months	Y	Y
Part 2	Continuous temperature monitor and recorder requirement (basis: cumulative increase, Regulation 1-521)						Y
Part 3	Record keeping requirement - temperature (basis: cumulative increase, BAAQMD Regulation 2-6-501)						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - A</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-1 – Cupola abated by A-20, A-22 Afterburner and A-19 Baghouse</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 4	Coke sulfur content limit and procedure to raise limit (basis: BAAQMD Regulation 9-1-302, BAAQMD Regulation 2-6-501)	Coke sulfur content limit 1.0% by weight	BAAQMD Condition #9351, Part 4	Fuel certification; Source test if > 1.0% S  P/E	Once every six months	Y	Y
Part 7	Gray iron throughput	Gray iron throughput ≤ 172,800 ton/any consecutive 12-months	BAAQMD Condition #9351, Part 8	Record keeping  P/M	Once every six months	Y	Y
Part 8	Record keeping requirement - Gray iron throughput (basis: Regulation 2-1-403)						Y
Part 9	Limit on firing rate of the A-20 Afterburner (basis: cumulative increase)	Firing rate of the A-20 Afterburner ≤ 8 MMBtu/hr	BAAQMD Condition #9351, Part 8	Record keeping  P/M	Once every six months	Y	Y
Part 10	Limit on firing rate of the A-22 Afterburner (basis: cumulative increase)	Firing rate of the A-22 Afterburner ≤ 8 MMBtu/hr	BAAQMD Condition #9351, Part 8	Record keeping  P/M	Once every six months	Y	Y
Part 11	Source test for PM, opacity, CO, VOC, SO <sub>2</sub> , NO <sub>x</sub> , lead every 5 years						Y
<b>CAM Condition #25039</b>							
Part 14a	Definition of exceedance: OPACITY Ringelmann 1.0 < 3 min/hr(Basis: 40 CFR Part 64.6(c)(2))						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - A</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-1 – Cupola abated by A-20, A-22 Afterburner and A-19 Baghouse</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 14b	Definitions of excursion: i) 10 milligrams PM/actual cubic meter for 15 min; or ii) Pressure drop less than 2 inches or greater than 10 inches water column (Basis: 40 CFR Part 64.6(c)(2))						Y
Part 15	Bag leak detector requirement (Basis: 40 CFR Part 64.6(c)(1); 40 CFR Part 64.6(c)(3))						Y
Part 16	Bag leak detector alarm requirement (Basis: 40 CFR Part 64.6(c)(1))						Y
Part 17	Indicator range: PM<10 milligrams/actual cubic meter (Basis: 40 CFR Part 64.3(a)(2))						Y
Part 18	Visual inspection and testing requirement for bag leak detection sensors (Basis: 40 CFR Part 64.3(b)(3) and (b)(2))						Y
Part 19	Pressure gauge installation requirement (Basis: 40 CFR Part 64.6(c)(1))						Y
Part 20	Indicator range for pressure gauges: 2 to 10 inches of water column(40 CFR Part 64.3(a)(2))						Y



#### IV. Source-Specific Applicable Requirements

<b>Table IV - A</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-1 – Cupola abated by A-20, A-22 Afterburner and A-19 Baghouse</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 21	Pressure gauge reading - Daily (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))						Y
Part 22	Pressure gauge calibration – quarterly (Basis: 40 CFR Part 64.3(b)(3) and (b)(2))						Y
Part 23	Procedures for excursion (Basis: 40 CFR Parts 64.6(c)(3), 64.7(d)(2), 64.8)						Y
Part 24	Method 9 observation requirement after 2 or more excursions at the same abatement device occur within 2 weeks (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))						Y
Part 25a	Reporting requirement – excursions, exceedances (Basis: 40 CFR Part 64.6(c)(3) and 40 CFR Part 64.9(a)(2))						Y
Part 25b	Reporting requirement – monitor downtime incidents (Basis: 40 CFR Part 64.6(c)(3) and 40 CFR Part 64.9(a)(2))						Y
Part 26	Inspection of baghouse and monitoring system (Basis: 40 CFR Part 64.6(c)(1)(iii))						Y
Part 27	Source test for PM and opacity – every 5 years (Basis: Regulation 2-1-403)						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - A</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-1 – Cupola abated by A-20, A-22 Afterburner and A-19 Baghouse</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 28	Recordkeeping requirements (Basis: Regulation 2-6-501 Recordkeeping)						Y

<b>Table IV - B</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
<b>BAAQMD Regulation 6, Rule 1</b>	<b>Particulate Matter (12/05/07)</b>						
6-1-301	Ringelmann 1.0 Limitation	OPACITY Ringelmann 1.0 < 3 min/hr	40 CFR 63.7740(b); CAM Condition #25039, Part 15 (A-21)	Bag leak detector  C	Once every six months	Y	N
			CAM Condition #25039 Part 21 (A-21)	Pressure drop monitoring  P/D	Once every six months	Y	N
			CAM Condition #25039 Part 2 (A-14, A-18)	Visible Emissions (M22)  P/W	Once every six months	Y	N

#### IV. Source-Specific Applicable Requirements

<b>Table IV - B</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
			CAM Condition #25039 Part 5 (A-14, A-18)	Pressure drop monitoring P/D	Once every six months	Y	N
			CAM Condition #25039, Part 11 (A-14, A-18) and Part 27 (A-21)	Source Test P/Every 5 years	Every 5 years	Y	N
6-1-305	Visible Particles						N
6-1-310	Particulate Weight Limitation	FILTERABLE PARTICULATE 0.15 gr/dscf	40 CFR 63.7740(b); CAM Condition #25039, Part 15 (A-21)	Bag leak detector C	Once every six months	Y	N
			CAM Condition #25039 Part 21 (A-21)	Pressure drop monitoring P/D	Once every six months	Y	N
			CAM Condition #25039 Part 2 (A-14, A-18)	Visible Emissions (M22) P/W	Once every six months	Y	N
			CAM Condition #25039 Part 5 (A-14, A-18)	Pressure drop monitoring P/D	Once every six months	Y	N

#### IV. Source-Specific Applicable Requirements

<b>Table IV - B</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
			CAM Condition #25039, Part 11 (A-14, A-18) and Part 27 (A-21)	Source Test P/every 5 years	Every 5 years	Y	N
6-1-311	General Operations	FILTERABLE PARTICULATE 4.10P <sup>0.67</sup> lb/hr where P is process weight, ton/hr	40 CFR 63.7740(b); CAM Condition #25039, Part 15 (A-21)	Bag leak detector C	Once every six months	Y	N
			CAM Condition #25039 Part 21 (A-21)	Pressure drop monitoring P/D	Once every six months	Y	N
			CAM Condition #25039 Part 2 (A-14, A-18)	Visible Emissions (M22) P/W	Once every six months	Y	N
			CAM Condition #25039 Part 5 (A-14, A-18)	Pressure drop monitoring P/D	Once every six months	Y	N
			CAM Condition #25039, Part 11 (A-14, A-18) and Part 27 (A-21)	Source Test P/every 5 years	Every 5 years	Y	N
6-1-401	Appearance of Emissions						N
6-1-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions						N
<b>SIP Regulation 6</b>	<b>Particulate Matter and Visible Emissions (09/04/98)</b>						

#### IV. Source-Specific Applicable Requirements

<b>Table IV - B</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
6-301	Ringelmann 1.0 Limitation	OPACITY Ringelmann 1.0 < 3 min/hr	40 CFR 63.7740(b); CAM Condition #25039, Part 15 (A-21)	Bag leak detector  C	Once every six months	Y	Y
			CAM Condition #25039 Part 21 (A-21)	Pressure drop monitoring  P/D	Once every six months	Y	Y
			CAM Condition #25039 Part 2 (A-14, A-18)	Visible Emissions (M22)  P/W	Once every six months	Y	Y
			CAM Condition #25039 Part 5 (A-14, A-18)	Pressure drop monitoring  P/D	Once every six months	Y	Y
			CAM Condition #25039, Part 11 (A-14, A- 18) and Part 27 (A-21)	Source Test  P/every 5 years	Once every six months	Y	Y
6-305	Visible Particles						Y
6-310	Particulate Weight Limitation	FILTERABLE PARTICULATE 0.15 gr/dscf	40 CFR 63.7740(b); CAM Condition #25039, Part 15 (A-21)	Bag leak detector  C	Once every six months	Y	Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - B</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
			CAM Condition #25039 Part 21 (A-21)	Pressure drop monitoring P/D	Once every six months	Y	Y
			CAM Condition #25039 Part 2 (A-14, A-18)	Visible Emissions (M22) P/W	Once every six months	Y	Y
			CAM Condition #25039 Part 5 (A-14, A-18)	Pressure drop monitoring P/D	Once every six months	Y	Y
			CAM Condition #25039, Part 11 (A-14, A-18) and Part 27 (A-21)	Source Test P/every 5 years	Once every six months	Y	Y
6-311	General Operations	FILTERABLE PARTICULATE 4.10P0.67 lb/hr. where P is process weight, ton/hr	40 CFR 63.7740(b); CAM Condition #25039, Part 15 (A-21)	Bag leak detector C	Once every six months	Y	Y
			CAM Condition #25039 Part 21 (A-21)	Pressure drop monitoring P/D	Once every six months	Y	Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - B</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
			CAM Condition #25039 Part 2 (A-14, A-18)	Visible Emissions (M22) P/W	Once every six months	Y	Y
			CAM Condition #25039 Part 5 (A-14, A-18)	Pressure drop monitoring P/D	Once every six months	Y	Y
			CAM Condition #25039, Part 11 (A-14, A-18) and Part 27 (A-21)	Source Test P/every 5 years	Once every six months	Y	Y
6-401	Appearance of Emissions						Y
6-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions						Y
<b>BAAQMD Regulation 8, Rule 2</b>	<b>Organic Compounds: Miscellaneous Operations (7/20/2005)</b>						
8-2-301	Miscellaneous Operations	VOC 15 lb/day and 300ppmd	BAAQMD Condition #23650, Part 7	Source Test P/Every 5 years	Every 5 years	Y	Y
8-2-601	Determination of Compliance						Y
<b>NESHAP 40 CFR Part 63, Subpart EEEEE</b>	<b>National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries (02/07/2008)</b>						
63.7681	Am I subject to this subpart?						Y
63.7682	What parts of my foundry does this subpart cover?						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - B</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
63.7683(a)	Existing source compliance deadline (April 23, 2007)						Y
63.7683(b)	Existing source compliance deadline for work practice standards (April 22, 2005)						Y
63.7683(f)	Notification and Schedule requirements (63.7750)						Y
63.7690(a)(5)	Emissions Limitations for each pouring station at existing iron and steel foundry	PM 0.010 gr/dscf; or 0.0008 gr/dscf of total metal HAP	63.7740(b)	Bag leak detector C	Once every six months	Y	Y
			63.7740(b)	Baghouse inspection P/varies			
			63.7731(a); 63.7743(a)(12)	Source Test P/Every 5 years			
63.7710(a)	Operate and maintain foundry consistent with good air pollution control practices						Y
63.7710(b)	Operation and maintenance plan for each capture and collection system and control device						Y
63.7710(b)(1)	Monthly inspections of abatement equipment						Y
63.7710(b)(3)	Preventative maintenance plan for each control device						Y
63.7710(b)(4)	Monitoring plan for each bag leak detection system						Y



#### IV. Source-Specific Applicable Requirements

<b>Table IV - B</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
63.7710(b)(5)	Corrective action plan for each baghouse	Initiate corrective action to determine the cause of the alarm within 1 hour of the alarm, initiate corrective action to correct the cause of the problem within 24 hours	63.7745(a)(4)	Record keeping  P/E	Once every six months	Y	Y
63.7710(b)(6)	Procedures for providing an ignition source to mold vents of sand mold systems						Y
63.7720(a)	General compliance requirements, exemption startup, shutdown, malfunction						Y
63.7720(c)	Develop a written startup, shutdown, and malfunction plan						Y
63.7730(a)	Initial performance test within 180 days of April 23, 2007	PM or total metal HAP: 63.7690(a)(5)	40 CFR Part 63.7(a)(2)	Initial performance test  P/E	Initial	Y	Y
63.7730(b)	Initial demonstration of compliance with work practice standards and operation and maintenance requirements within 30 days of April 22, 2005						Y
63.7731(a)	Subsequent performance tests for PM	PM or total metal HAP: 63.7690(a)(5)	63.7731(a)	Source Test  P/Every 5 years	Every 5 years	Y	Y
63.7732	Test Methods						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - B</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
63.7733	Procedures for establishing operating limits						Y
63.7734(a)(2)	Initial compliance demonstration for existing cupola						Y
63.7735	Initial compliance demonstration with work practice standards						Y
63.7736	Initial compliance demonstration with operation and maintenance requirements						Y
63.7740(b)	Monitoring requirements –for baghouse, use bag leak detection system						Y
63.7740(c)(1)	Monitoring requirements – Baghouse inspection requirements	Pressure drop Normal operating range	63.7740(c)(1)	Pressure drop monitoring  P/D	Once every six months	Y	Y
63.7740(c)(2)	Monitoring requirements – Baghouse inspection requirements	Check dust removal from hoppers	63.7740(c)(2)	Visual inspection  P/W	Once every six months	Y	Y
63.7740(c)(3)	Monitoring requirements – Baghouse inspection requirements	Adequate compressed air supply for pulse-jet baghouses	63.7740(c)(3)	Inspection  P/D	Once every six months	Y	Y
63.7740(c)(4)	Monitoring requirements – Baghouse inspection requirements	Monitor cleaning cycles	63.7740(c)(4)	Inspection  P/A	Once every six months	Y	Y
63.7740(c)(5)	Monitoring requirements – Baghouse inspection requirements	Check bag cleaning mechanisms	63.7740(c)(5)	Visual inspection  P/M	Once every six months	Y	Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - B</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
63.7740(c)(7)	Monitoring requirements – Baghouse inspection requirements	Check physical integrity of baghouses interior	63.7740(c)(7)	Visual inspection P/Q	Once every six months	Y	Y
63.7740(c)(8)	Monitoring requirements – Baghouse inspection requirements	Inspect fans for wear, material buildup, corrosion	63.7740(c)(8)	Visual inspection P/Q	Once every six months	Y	Y
63.7741(b) (1-5)	Install, operate, maintain a bag leak detection system						Y
63.7741(f) (1,2,3)	CPMS requirements						Y
63.7742	Monitoring and collection of data to demonstrate continuous compliance (excluding malfunctions, associated repairs, required quality assurance or control activities)						Y
63.7743(a)(5)	Continuous compliance demonstration for existing pouring station	Maintaining the average limits: PM 0.010 gr/dscf; or 0.0008 gr/dscf of total metal HAP	63.7740(b)	Bag leak detector C	Once every six months	Y	Y
			63.7740 (c)	Baghouse inspection P/varies			

#### IV. Source-Specific Applicable Requirements

<b>Table IV - B</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
			63.7731(a); 63.7743(a)(12)	Source Test  P/Every 5 years			
63.7743(a)(12)	Continuous compliance demonstration - subsequent performance tests for PM	PM or total metal HAP: 63.7690(a)(5)	63.7731(a)	Source Test  P/Every 5 years	Every 5 years	Y	Y
63.7743(c)	Continuous compliance demonstration - baghouse			Inspections  P/varies	Once every six months	Y	Y
63.7745(a)(1)	Continuous compliance demonstration – operation and maintenance requirements			Inspections, corrective action, record keeping  P/M	Once every six months	Y	Y
63.7745	Igniting gasses from mold vents		63.7710(b)(6)	P/E			Y
63.7745(a)(2)	Continuous compliance demonstration – Preventative maintenance			Record keeping  P/E	Once every six months	Y	Y
63.7745(a)(3)	Continuous compliance demonstration – bag leak detection system			Record keeping  P/E	Once every six months	Y	Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - B</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
63.7745(a)(4)	Continuous compliance demonstration – baghouse corrective action			Record keeping P/E	Once every six months	Y	Y
63.7745(b)	Maintain operation and maintenance plan onsite						Y
63.7746(a)	Deviations	Report deviations from emissions limitations, work practice standards, and operation and maintenance requirements, including startup, shutdown, malfunction	63.7746(a)	Record keeping P/E	Once every six months	Y	Y
63.7746(b)	Startup, shutdown, malfunction deviations are not violations						Y
63.7750	Notification requirements						Y
63.7751	Reporting requirements						Y
63.7752	Recordkeeping requirements						Y
63.7753	Recordkeeping requirements (5 years)						Y
63.7760	Table 1: Applicability of General Provisions (Subpart A)						Y
63.7761	Delegation						Y
63.7765	Definitions						Y
<b>BAAQMD Condition #23650</b>							

#### IV. Source-Specific Applicable Requirements

<b>Table IV - B</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 1	Abatement requirement with A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5 (basis: Cumulative Increase)						Y
Part 4	A-21 Baghouse #5 outlet grain loading limit (basis: cumulative increase)	FILTERABLE PARTICULATE 0.01 gr/dscf	CAM Condition #25039, Part 13	Bag leak detector  C	Once every six months	Y	Y
Part 6	Recordkeeping requirement (basis: Regulation 2-1-403)						Y
Part 7	Source test requirement for VOC every 5 years (basis: Regulation 2-1-403)						Y
Part 8	Iron cast in sand molds facility limit (Basis: Cumulative Increase)	Iron casting ≤ 36,000 tons/any consecutive 12-month period	BAAQMD Condition #2237, Part 6	Record keeping  P/M	Once every six months	Y	Y
<b>CAM Condition #25039</b>							
<b>For A-14 and A-18</b>							
Part 1	Definition of exceedance: OPACITY Ringelmann 1.0 < 3 min/hr (Basis: 40 CFR Part 64.6(c)(2))						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - B</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 2	Definitions of excursion: i) any visible emissions (M22); or iii) Pressure drop less than 2 inches or greater than 10 inches water column (Basis: 40 CFR Part 64.6(c)(2))						Y
Part 3	Pressure gauge installation requirement (Basis: 40 CFR Part 64.6(c)(1))						Y
Part 4	Indicator range for pressure gauges: 2 to 10 inches of water column (40 CFR Part 64.3(a)(2))						Y
Part 5	Pressure gauge reading - Daily (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))						Y
Part 6	Pressure gauge calibration (Basis: 40 CFR Part 64.3(b)(3) and (b)(2))						Y
Part 7	Procedures for excursion (Basis: 40 CFR Parts 64.6(c)(3), 64.7(d)(2), 64.8)						Y
Part 8	Method 9 observation requirement after 2 or more excursions at the same abatement device occur within 2 weeks (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - B</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 9a	Reporting requirement – excursions, exceedances (Basis: 40 CFR Part 64.6(c)(3) and 40 CFR Part 64.9(a)(2))						Y
Part 9b	Reporting requirement – monitor downtime incidents (Basis: 40 CFR Part 64.6(c)(3) and 40 CFR Part 64.9(a)(2))						Y
Part 10	Inspection of baghouse (Basis: 40 CFR Part 64.6(c)(1)(iii))						Y
Part 11	Source test for compliance with SIP Regulation 6, sections 301, 310 and 311 – every 5 years (Basis: Regulation 2-1-403)						Y
Part 12	Recordkeeping requirements (Basis: Regulation 2-6-501 Recordkeeping)						Y
Part 13	Operation and Maintenance Plan (non-NESHAP) requirement (Basis: 40 CFR Part 64.6(c)(1)(iii))						Y
<b>For A-21</b>							
Part 14a	Definition of exceedance: OPACITY Ringelmann 1.0 < 3 min/hr (Basis: 40 CFR Part 64.6(c)(2))						Y



#### IV. Source-Specific Applicable Requirements

<b>Table IV - B</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 14b	Definitions of excursion: i) 10 milligrams PM/actual cubic meter for 15 min; or ii) Pressure drop less than 2 inches or greater than 10 inches water column (Basis: 40 CFR Part 64.6(c)(2))						Y
Part 15	Bag leak detector requirement (Basis: 40 CFR Part 64.6(c)(1); 40 CFR Part 64.6(c)(3))						Y
Part 16	Bag leak detector alarm requirement (Basis: 40 CFR Part 64.6(c)(1))						Y
Part 17	Indicator range: PM<10 milligrams/actual cubic meter (Basis: 40 CFR Part 64.3(a)(2))						Y
Part 18	Visual inspection and testing requirement for bag leak detection sensors (Basis: 40 CFR Part 64.3(b)(3) and (b)(2))						Y
Part 19	Pressure gauge installation requirement (Basis: 40 CFR Part 64.6(c)(1))						Y
Part 20	Indicator range for pressure gauges: 2 to 10 inches of water column(40 CFR Part 64.3(a)(2))						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - B</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 21	Pressure gauge reading - Daily (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))						Y
Part 22	Pressure gauge calibration – quarterly(Basis: 40 CFR Part 64.3(b)(3) and (b)(2))						Y
Part 23	Procedures for excursion (Basis: 40 CFR Parts 64.6(c)(3), 64.7(d)(2), 64.8)						Y
Part 24	Method 9 observation requirement after 2 or more excursions at the same abatement device occur within 2 weeks (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))						Y
Part 25a	Reporting requirement – excursions, exceedances (Basis: 40 CFR Part 64.6(c)(3) and 40 CFR Part 64.9(a)(2))						Y
Part 25b	Reporting requirement – monitor downtime incidents(Basis: 40 CFR Part 64.6(c)(3) and 40 CFR Part 64.9(a)(2))						Y
Part 26	Inspection of baghouse and monitoring system (Basis: 40 CFR Part 64.6(c)(1)(iii))						Y
Part 27	Source test for PM and opacity – every 5 years (Basis: Regulation 2-1-403)						Y

**IV. Source-Specific Applicable Requirements**

<p align="center"><b>Table IV - B</b>  <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b>  <b>Compliance Monitoring Requirements</b>  <b>S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2,</b>  <b>A-18 Baghouse #4 and A-21 Baghouse #5</b></p>							
<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Limit</b>	<b>Monitoring Citation</b>	<b>Monitoring &amp; Frequency</b>	<b>Reporting</b>	<b>R*</b>	<b>FE</b>
Part 28	Recordkeeping requirements (Basis: Regulation 2-6-501 Recordkeeping)						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - C</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-3 –Sand Preparation abated by A-15 Baghouse #1</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
<b>BAAQMD Regulation 6, Rule 1</b>	<b>Particulate Matter (12/05/07)</b>						
6-1-301	Ringelmann 1.0 Limitation	OPACITY Ringelmann 1.0 < 3 min/hr	CAM Condition #25039 Part 2	Visible Emissions (M22) P/W	Once every six months	Y	N
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y	N
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	Y	N
6-1-305	Visible Particles						N
6-1-310	Particulate Weight Limitation	FILTERABLE PARTICULATE 0.15 gr/dscf	CAM Condition #25039 Part 2	Visible Emissions (M22) P/W	Once every six months	Y	N
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y	N
			CAM Condition #25039, Part 11	Source Test P/every 5 years	Every 5 years	Y	N
6-1-311	General Operations	FILTERABLE PARTICULATE 4.10P <sup>0.67</sup> lb/hr where P is process weight, ton/hr	CAM Condition #25039 Part 2	Visible Emissions (M22) P/W	Once every six months	Y	N

#### IV. Source-Specific Applicable Requirements

<b>Table IV - C</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-3 –Sand Preparation abated by A-15 Baghouse #1</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y	N
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	Y	N
6-1-401	Appearance of Emissions						N
6-1-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions						N
<b>SIP Regulation 6</b>	<b>Particulate Matter and Visible Emissions (09/04/98)</b>						
6-301	Ringelmann 1.0 Limitation	OPACITY Ringelmann 1.0 < 3 min/hr	CAM Condition #25039 Part 2	Visible Emissions (M22) P/W	Once every six months	Y	Y
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y	Y
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	Y	Y
6-305	Visible Particles						Y
6-310	Particulate Weight Limitation	FILTERABLE PARTICULATE 0.15 gr/dscf	CAM Condition #25039 Part 2	Visible Emissions (M22) P/W	Once every six months	Y	Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - C</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-3 –Sand Preparation abated by A-15 Baghouse #1</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y	Y
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	Y	Y
6-311	General Operations	FILTERABLE PARTICULATE 4.10P <sup>0.67</sup> lb/hr. where P is process weight, ton/hr	CAM Condition #25039 Part 2	Visible Emissions (M22) P/W	Once every six months	Y	Y
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y	Y
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	Y	Y
6-401	Appearance of Emissions						Y
6-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions						Y
<b>BAAQMD Condition #2237</b>							
Part 2	Abatement requirement with A-15 Baghouse #1 (Basis: Cumulative Increase)						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - C</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-3 –Sand Preparation abated by A-15 Baghouse #1</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 3	A-15 Baghouse #1 maintenance requirement (Basis: Cumulative Increase)						Y
Part 4	A-15 Baghouse #1 outlet grain loading limit (Basis: Cumulative Increase)	FILTERABLE PARTICULATE 0.04 gr/dscf	BAAQMD Condition #2237, Part 6	Record keeping of Preventative Maintenance  P/W	Once every six months	Y	Y
			CAM Condition #25039, Part 11	Source Test  P/Every 5 years	Every 5 years	Y	Y
Part 5	Monthly good iron casting production record keeping (Basis: Cumulative Increase, BAAQMD Regulation 2-6-501)						Y
Part 9	Sand throughput limit (Basis: Cumulative Increase)	Sand throughput limit ≤ 572,000 tons/any consecutive 12-month period	BAAQMD Condition #2237, Part 10	Record keeping  P/M	Once every six months	Y	Y
Part 10	Record keeping requirements (Basis: Regulation 2-1-403)						Y
<b>CAM Condition #25039</b>							
Part 1	Definition of exceedance: OPACITY Ringelmann 1.0 < 3 min/hr (Basis: 40 CFR Part 64.6(c)(2))						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - C</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-3 –Sand Preparation abated by A-15 Baghouse #1</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 2	Definitions of excursion: i) any visible emissions (M22); or iii) Pressure drop less than 2 inches or greater than 10 inches water column (Basis: 40 CFR Part 64.6(c)(2))						Y
Part 3	Pressure gauge installation requirement (Basis: 40 CFR Part 64.6(c)(1))						Y
Part 4	Indicator range for pressure gauges: 2 to 10 inches of water column (40 CFR Part 64.3(a)(2))						Y
Part 5	Pressure gauge reading - Daily (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))						Y
Part 6	Pressure gauge calibration (Basis: 40 CFR Part 64.3(b)(3) and (b)(2))						Y
Part 7	Procedures for excursion (Basis: 40 CFR Parts 64.6(c)(3), 64.7(d)(2), 64.8)						Y
Part 8	Method 9 observation requirement after 2 or more excursions at the same abatement device occur within 2 weeks (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))						Y



#### IV. Source-Specific Applicable Requirements

<b>Table IV - C</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-3 –Sand Preparation abated by A-15 Baghouse #1</b>							
<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Limit</b>	<b>Monitoring Citation</b>	<b>Monitoring &amp; Frequency</b>	<b>Reporting</b>	<b>R*</b>	<b>FE</b>
Part 9a	Reporting requirement – excursions, exceedances (Basis: 40 CFR Part 64.6(c)(3) and 40 CFR Part 64.9(a)(2))						Y
Part 9b	Reporting requirement – monitor downtime incidents (Basis: 40 CFR Part 64.6(c)(3) and 40 CFR Part 64.9(a)(2))						Y
Part 10	Inspection of baghouse (Basis: 40 CFR Part 64.6(c)(1)(iii))						Y
Part 11	Source test for compliance with SIP Regulation 6, sections 301, 310 and 311 – every 5 years (Basis: Regulation 2-1-403)						Y
Part 12	Recordkeeping requirements (Basis: Regulation 2-6-501 Recordkeeping)						Y
Part 13	Operation and Maintenance Plan (non-NESHAP) requirement – includes monitoring, inspection, maintenance, corrective action plan, recordkeeping (Basis: 40 CFR Part 64.6(c)(1)(iii))						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - D</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-4 – Wheelabrator Shot Blast (No.1) abated by A-17 Baghouse #3</b> <b>S-5 Pangborn Shot Blast (No. 2) abated by A-17 Baghouse #3</b> <b>S-27 Wheelabrator Shot Blast (No. 3) abated by A-17 Baghouse #3</b> <b>S-30 Inline Shot Blast abated by A-17 Baghouse #3</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
<b>BAAQMD Regulation 6, Rule 1</b>	<b>Particulate Matter (12/05/07)</b>						
6-1-301	Ringelmann 1.0 Limitation	OPACITY Ringelmann 1.0 < 3 min/hr	CAM Condition #25039 Part 2	Visible Emissions (M22)  P/W	Once every six months	Y	N
			CAM Condition #25039 Part 5	Pressure drop monitoring  P/D	Once every six months	Y	N
			CAM Condition #25039, Part 11	Source Test  P/Every 5 years	Every 5 years	Y	N
6-1-305	Visible Particles						N
6-1-310	Particulate Weight Limitation	FILTERABLE PARTICULATE 0.15 gr/dscf	CAM Condition #25039 Part 2	Visible Emissions (M22)  P/W	Once every six months	Y	N
			CAM Condition #25039 Part 5	Pressure drop monitoring  P/D	Once every six months	Y	N

#### IV. Source-Specific Applicable Requirements

<b>Table IV - D</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-4 – Wheelabrator Shot Blast (No.1) abated by A-17 Baghouse #3</b> <b>S-5 Pangborn Shot Blast (No. 2) abated by A-17 Baghouse #3</b> <b>S-27 Wheelabrator Shot Blast (No. 3) abated by A-17 Baghouse #3</b> <b>S-30 Inline Shot Blast abated by A-17 Baghouse #3</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	Y	N
6-1-311	General Operations	FILTERABLE PARTICULATE $4.10P^{0.67}$ lb/hr where P is process weight, ton/hr	CAM Condition #25039 Part 2	Visible Emissions (M22) P/W	Once every six months	Y	N
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y	N
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	Y	N
6-1-401	Appearance of Emissions						N
6-1-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions						N
<b>SIP Regulation 6</b>	<b>Particulate Matter and Visible Emissions (09/04/98)</b>						
6-301	Ringelmann 1.0 Limitation	OPACITY Ringelmann 1.0 < 3 min/hr	CAM Condition #25039 Part 2	Visible Emissions (M22) P/W	Once every six months	Y	Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - D</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-4 – Wheelabrator Shot Blast (No.1) abated by A-17 Baghouse #3</b> <b>S-5 Pangborn Shot Blast (No. 2) abated by A-17 Baghouse #3</b> <b>S-27 Wheelabrator Shot Blast (No. 3) abated by A-17 Baghouse #3</b> <b>S-30 Inline Shot Blast abated by A-17 Baghouse #3</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y	Y
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	Y	Y
6-305	Visible Particles						Y
6-310	Particulate Weight Limitation	FILTERABLE PARTICULATE 0.15 gr/dscf	CAM Condition #25039 Part 2	Visible Emissions (M22) P/W	Once every six months	Y	Y
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y	Y
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	Y	Y
6-311	General Operations	FILTERABLE PARTICULATE 4.10P0.67 lb/hr. where P is process weight, ton/hr	CAM Condition #25039 Part 2	Visible Emissions (M22) P/W	Once every six months	Y	Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - D</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-4 – Wheelabrator Shot Blast (No.1) abated by A-17 Baghouse #3</b> <b>S-5 Pangborn Shot Blast (No. 2) abated by A-17 Baghouse #3</b> <b>S-27 Wheelabrator Shot Blast (No. 3) abated by A-17 Baghouse #3</b> <b>S-30 Inline Shot Blast abated by A-17 Baghouse #3</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y	Y
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	Y	Y
6-401	Appearance of Emissions						Y
6-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions						Y
<b>BAAQMD Condition #10139</b>							
Part 1	S-27 Wheelabrator Shot Blast (No. 3) shot throughput limit (Basis: Cumulative Increase)	Shot blast material ≤ 36 tons/any consecutive 12-month period	BAAQMD Condition #10139, Part 5	Record keeping P/M	Once every six months	Y	Y
Part 2	Abatement requirement with A-17 Baghouse #3 (Basis: Cumulative Increase)						Y
Part 5	S-27 throughput record keeping (Basis: Cumulative Increase, BAAQMD Regulation 2-6-501)						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - D</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-4 – Wheelabrator Shot Blast (No.1) abated by A-17 Baghouse #3</b> <b>S-5 Pangborn Shot Blast (No. 2) abated by A-17 Baghouse #3</b> <b>S-27 Wheelabrator Shot Blast (No. 3) abated by A-17 Baghouse #3</b> <b>S-30 Inline Shot Blast abated by A-17 Baghouse #3</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 6	S-4 – Wheelabrator Shot Blast (No.1) shot throughput limit (Basis: Regulation 2-1-403)	Shot blast material ≤ 4,600 tons/any consecutive 12-month period	BAAQMD Condition #10139, Part 8	Record keeping P/M	Once every six months	Y	Y
Part 7	S-5 Pangborn Shot Blast (No. 2) shot throughput limit (Basis: Regulation 2-1-403)	Shot blast material ≤ 2,800 tons/any consecutive 12-month period	BAAQMD Condition #10139, Part 8	Record keeping P/M	Once every six months	Y	Y
Part 8	Record keeping requirements (Basis: Regulation 2-1-403)						Y
<b>BAAQMD Condition #13298</b>							
Part 1	S-30 Blast Cleaning Machine blast media throughput limit (Basis: Cumulative Increase)	Shot blast material ≤ 105 tons/any consecutive 12-month period	BAAQMD Condition #13298 Part 3	Record keeping P/M	Once every six months	Y	Y
Part 2	Abatement requirement with A-17 Baghouse #3 (Basis: Cumulative Increase)						Y
Part 3	Record keeping requirements (Basis: Regulation 2-1-403)						Y
<b>CAM Condition #25039</b>							
Part 1	Definition of exceedance: OPACITY Ringelmann 1.0 < 3 min/hr (Basis: 40 CFR Part 64.6(c)(2))						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - D</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-4 – Wheelabrator Shot Blast (No.1) abated by A-17 Baghouse #3</b> <b>S-5 Pangborn Shot Blast (No. 2) abated by A-17 Baghouse #3</b> <b>S-27 Wheelabrator Shot Blast (No. 3) abated by A-17 Baghouse #3</b> <b>S-30 Inline Shot Blast abated by A-17 Baghouse #3</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 2	Definitions of excursion: i) any visible emissions (M22); or iii) Pressure drop less than 2 inches or greater than 10 inches water column (Basis: 40 CFR Part 64.6(c)(2))						Y
Part 3	Pressure gauge installation requirement (Basis: 40 CFR Part 64.6(c)(1))						Y
Part 4	Indicator range for pressure gauges: 2 to 10 inches of water column (40 CFR Part 64.3(a)(2))						Y
Part 5	Pressure gauge reading - Daily (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))						Y
Part 6	Pressure gauge calibration (Basis: 40 CFR Part 64.3(b)(3) and (b)(2))						Y
Part 7	Procedures for excursion (Basis: 40 CFR Parts 64.6(c)(3), 64.7(d)(2), 64.8)						Y
Part 8	Method 9 observation requirement after 2 or more excursions at the same abatement device occur within 2 weeks (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - D</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-4 – Wheelabrator Shot Blast (No.1) abated by A-17 Baghouse #3</b> <b>S-5 Pangborn Shot Blast (No. 2) abated by A-17 Baghouse #3</b> <b>S-27 Wheelabrator Shot Blast (No. 3) abated by A-17 Baghouse #3</b> <b>S-30 Inline Shot Blast abated by A-17 Baghouse #3</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 9a	Reporting requirement – excursions, exceedances (Basis: 40 CFR Part 64.6(c)(3) and 40 CFR Part 64.9(a)(2))						Y
Part 9b	Reporting requirement – monitor downtime incidents (Basis: 40 CFR Part 64.6(c)(3) and 40 CFR Part 64.9(a)(2))						Y
Part 10	Inspection of baghouse (Basis: 40 CFR Part 64.6(c)(1)(iii))						Y
Part 11	Source test for compliance with SIP Regulation 6, sections 301, 310 and 311 – every 5 years (Basis: Regulation 2-1-403)						Y
Part 12	Recordkeeping requirements (Basis: Regulation 2-6-501 Recordkeeping)						Y
Part 13	Operation and Maintenance Plan (non-NESHAP) requirement – includes monitoring, inspection, maintenance, corrective action plan, recordkeeping (Basis: 40 CFR Part 64.6(c)(1)(iii))						Y



#### IV. Source-Specific Applicable Requirements

<b>Table IV - E Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements S-25 Holding Furnace abated by A-25 Fume Baghouse</b>							
<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Limit</b>	<b>Monitoring Citation</b>	<b>Monitoring &amp; Frequency</b>	<b>Reporting</b>	<b>R*</b>	<b>FE</b>
<b>BAAQMD Regulation 6, Rule 1</b>	<b>Particulate Matter (12/05/07)</b>						
6-1-301	Ringelmann 1.0 Limitation	OPACITY Ringelmann 1.0 < 3 min/hr	BAAQMD Condition #9668, Part 3	Bag leak detector C	Once every six months	Y	N
			BAAQMD Condition #9668, Part 8	Source Test P/Every 5 years	Every 5 years	Y	N
			BAAQMD Condition #9668, Part 5	Record keeping of preventative maintenance  P/W	Once every six months	Y	N
6-1-305	Visible Particles						N
6-1-310	Particulate Weight Limitation	FILTERABLE PARTICULATE 0.15 gr/dscf	BAAQMD Condition #9668, Part 3	Bag leak detector C	Once every six months	Y	N
			BAAQMD Condition #9668, Part 8	Source Test P/Every 5 years	Every 5 years	Y	N
			BAAQMD Condition #9668, Part 5	Record keeping of preventative maintenance  P/W	Once every six months	Y	N

#### IV. Source-Specific Applicable Requirements

<b>Table IV - E</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-25 Holding Furnace abated by A-25 Fume Baghouse</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
6-1-311	General Operations	FILTERABLE PARTICULATE 4.10P <sup>0.67</sup> lb/hr where P is process weight, ton/hr	BAAQMD Condition #9668, Part 3	Bag leak detector  C	Once every six months	Y	N
			BAAQMD Condition #9668, Part 8	Source Test P/Every 5 years	Every 5 years	Y	N
			BAAQMD Condition #9668, Part 5	Record keeping of preventative maintenance  P/W	Once every six months	Y	N
6-1-401	Appearance of Emissions						N
6-1-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions						N
<b>SIP Regulation 6</b>	<b>Particulate Matter and Visible Emissions (09/04/98)</b>						
6-301	Ringelmann 1.0 Limitation	OPACITY Ringelmann 1.0 < 3 min/hr	BAAQMD Condition #9668, Part 3	Bag leak detector  C	Once every six months	Y	Y
			BAAQMD Condition #9668, Part 8	Source Test P/Every 5 years	Every 5 years	Y	Y
			BAAQMD Condition #9668, Part 5	Record keeping of preventative maintenance  P/W	Once every six months	Y	Y
6-305	Visible Particles						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - E</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-25 Holding Furnace abated by A-25 Fume Baghouse</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
6-310	Particulate Weight Limitation	FILTERABLE PARTICULATE 0.15 gr/dscf	BAAQMD Condition #9668, Part 3	Bag leak detector  C	Once every six months	Y	Y
			BAAQMD Condition #9668, Part 8	Source Test  P/Every 5 years	Every 5 years	Y	Y
			BAAQMD Condition #9668, Part 5	Record keeping of preventative maintenance  P/W	Once every six months	Y	Y
6-311	General Operations	FILTERABLE PARTICULATE 4.10P0.67 lb/hr. where P is process weight, ton/hr	BAAQMD Condition #9668, Part 3	Bag leak detector  C	Once every six months	Y	Y
			BAAQMD Condition #9668, Part 8	Source Test  P/Every 5 years	Every 5 years	Y	Y
			BAAQMD Condition #9668, Part 5	Record keeping of preventative maintenance  P/W	<u>Once every six months</u>	<u>Y</u>	Y
6-401	Appearance of Emissions						Y
6-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions						Y
<b>BAAQMD Condition #9668</b>							

#### IV. Source-Specific Applicable Requirements

<b>Table IV - E</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-25 Holding Furnace abated by A-25 Fume Baghouse</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 1	Abatement requirement (basis: cumulative increase)						Y
Part 2	Baghouse maintenance requirement (basis: cumulative increase.)		BAAQMD Condition #9668, Part 5	Preventative maintenance record keeping  P/W	Once every six months	Y	Y
Part 3	Broken bag leak detector requirement (basis: cumulative increase)						Y
Part 4	A-25 outlet grain loading limit (basis: cumulative increase)	PM10 0.002 gr/dscf	BAAQMD Condition #9668, Part 3	Bag leak detector  C	Once every six months	Y	Y
Part 5	Weekly records of preventive maintenance inspections of A-25 Fume Baghouse (basis: BAAQMD Regulation 6-1-301, BAAQMD Regulation 2-6-501)						Y
Part 6	Gray iron throughput limit (basis: Regulation 2-1-403)	Gray iron throughput ≤ 172,000 ton/any consecutive 12-month period	BAAQMD Condition #9668, Part 7	Record keeping  P/M	Once every six months	Y	Y
Part 7	Gray iron throughput record keeping requirement						Y
Part 8	Source testing requirement for PM and opacity						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - F</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-28 Storage Silo (Baghouse Dust) abated by A-19 Cupola Baghouse</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
<b>BAAQMD Regulation 6, Rule 1</b>	<b>Particulate Matter (12/05/07)</b>						
6-1-301	Ringelmann 1.0 Limitation	OPACITY Ringelmann 1.0 < 3 min/hr	63.7740(b); CAM Condition #25039, Part 15	Bag leak detector  C	Once every six months	Y	N
			CAM Condition #25039, Part 21	Pressure drop monitoring  P/D	Once every six months	Y	N
			BAAQMD Condition #9351, Part 11; CAM Condition #25039, Part 27	Source Test  P/Every 5 years	Every 5 years	Y	N
6-1-305	Visible Particles						N
6-1-310	Particulate Weight Limitation	FILTERABLE PARTICULATE 0.15 gr/dscf	63.7740(b); CAM Condition #25039, Part 15	Bag leak detector  C	Once every six months	Y	N
			CAM Condition #25039, Part 21	Pressure drop monitoring  P/D	Once every six months	Y	N
			BAAQMD Condition #9351, Part 11; CAM Condition #25039, Part 27	Source Test  P/Every 5 years	Every 5 years	Y	N
6-1-311	General Operations	FILTERABLE PARTICULATE 4.10P0.67 lb/hr. where P is process weight, ton/hr	63.7740(b); CAM Condition #25039, Part 15	Bag leak detector  C	Once every six months	Y	N

#### IV. Source-Specific Applicable Requirements

<b>Table IV - F</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-28 Storage Silo (Baghouse Dust) abated by A-19 Cupola Baghouse</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
			CAM Condition #25039, Part 21	Pressure drop monitoring P/D	Once every six months	Y	N
			BAAQMD Condition #9351, Part 11; CAM Condition #25039, Part 27	Source Test P/Every 5 years	Every 5 years	Y	N
6-1-401	Appearance of Emissions						N
6-1-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions						N
<b>SIP Regulation 6</b>	<b>Particulate Matter and Visible Emissions (09/04/98)</b>						
6-301	Ringelmann 1.0 Limitation	OPACITY Ringelmann 1.0 < 3 min/hr	63.7740(b); CAM Condition #25039, Part 15	Bag leak detector C	Once every six months	Y	Y
			CAM Condition #25039, Part 21	Pressure drop monitoring P/D	Once every six months	Y	Y
			BAAQMD Condition #9351, Part 11; CAM Condition #25039, Part 27	Source Test P/Every 5 years	Every 5 years	Y	Y
6-305	Visible Particles						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - F</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-28 Storage Silo (Baghouse Dust) abated by A-19 Cupola Baghouse</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
6-310	Particulate Weight Limitation	FILTERABLE PARTICULATE 0.15 gr/dscf	63.7740(b); CAM Condition #25039, Part 15	Bag leak detector  C	Once every six months	Y	Y
			CAM Condition #25039, Part 21	Pressure drop monitoring  P/D	Once every six months	Y	Y
			BAAQMD Condition #9351, Part 11; CAM Condition #25039, Part 27	Source Test  P/Every 5 years	Every 5 years	Y	Y
6-311	General Operations	FILTERABLE PARTICULATE 4.10P0.67 lb/hr. where P is process weight, ton/hr	63.7740(b); CAM Condition #25039, Part 15	Bag leak detector  C	Once every six months	Y	Y
			CAM Condition #25039, Part 21	Pressure drop monitoring  P/D	Once every six months	Y	Y
			BAAQMD Condition #9351, Part 11; CAM Condition #25039, Part 27	Source Test  P/Every 5 years	Every 5 years	Y	Y
6-401	Appearance of Emissions						Y
6-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - F</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-28 Storage Silo (Baghouse Dust) abated by A-19 Cupola Baghouse</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
<b>BAAQMD Condition #10762</b>							
Part 1	Abatement requirement with A-19 (Basis: Cumulative Increase)						Y
Part 6	Throughput limit (basis: Regulation 2-1-403)	Throughput 1500 ton/ any consecutive 12-month period	BAAQMD Condition #10762, Part 7	Record keeping P/M	Once every six months	Y	Y
Part 7	Record keeping requirements (Basis: Regulation 2-1-403)						Y



#### IV. Source-Specific Applicable Requirements

<b>Table IV - G</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-31 Emergency Standby Diesel Generator</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R	FE
<b>BAAQMD Regulation 6, Rule 1</b>	<b>Particulate Matter (12/05/07)</b>						
6-1-303.1	Ringelmann Number 2 Limitation	OPACITY Ringelmann 2.0 for < 3 min/hr		N			N
6-1-305	Visible Particles						N
6-1-310	Particulate Weight Limitation	FILTERABLE PARTICULATE 0.15 gr/dscf		N			N
6-1-401	Appearance of Emissions						N
<b>SIP Regulation 6</b>	<b>Particulate Matter and Visible Emissions (09/04/98)</b>						
6-303.1	Ringelmann Number 2 Limitation	OPACITY Ringelmann 2.0 for < 3 min/hr		N			Y
6-305	Visible Particles						Y
6-310	Particulate Weight Limitation	FILTERABLE PARTICULATE 0.15 gr/dscf		N			Y
6-401	Appearance of Emissions						Y
<b>BAAQMD Regulation 9, Rule 1</b>	<b>Inorganic Gaseous Pollutants: Sulfur Dioxide (3/15/1995)</b>						
9-1-301	Ground Level Concentration	SO2 < 0.5 ppm continuously for 3 consecutive minutes or 0.25 ppm averaged over 60 consecutive minutes, or 0.05 ppm averaged over 24 hours.		N			Y
9-1-304	Fuel Burning (Liquid and Solid Fuels)	Sulfur content of liquid fuel ≤ 0.5% by weight		N			Y
9-1-602	Sulfur Content of Fuels						Y
<b>BAAQMD Regulation 9, Rule 8</b>	<b>Inorganic Gaseous Pollutants: NOx and CO from Stationary Internal Combustion Engines (7/25/2007)</b>						
9-8-110.5	Exemption Emergency Standby engines						N
9-8-330	Emergency Standby Engines, Hours of Operation						N
9-8-330.1	Emergency Standby Engines, Hours of Operation	Unlimited hours for emergency use					N
9-8-330.2	Emergency Standby Engines, Hours of Operation (until 1/01/2012)	Reliability-related activities limited to 100 hours per calendar year	BAAQMD Condition # 19947, part 1	Log/Record Keeping P/M	Once every six months	Y	N

#### IV. Source-Specific Applicable Requirements

<b>Table IV - G</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-31 Emergency Standby Diesel Generator</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R	FE
9-8-330.3	Emergency Standby Engines, Hours of Operation (effective 1/01/2012)	Reliability-related activities limited to 50 hours per calendar year	BAAQMD Condition # 19947, part 1	Log/Record Keeping P/M	Once every six months	Y	N
9-8-530	Emergency Standby Engines, Monitoring and Recordkeeping						N
<b>SIP Regulation 9, Rule 8</b>	<b>Inorganic Gaseous Pollutants: NOx and CO from Stationary Internal Combustion Engines (12/15/1997)</b>						
9-8-101	Exclusion: Emergency Standby Engines						Y
<b>40 CFR Part 63, Subpart ZZZZ</b>	<b>National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (3/09/11)</b>						
63.6580	What is the purpose of subpart ZZZZ?						Y
63.6585(a), (b)	Am I subject to this subpart? – stationary RICE located at a major source of HAPs						Y
63.6590(a)(1)(i)	What parts of my plant does this subpart cover? – existing stationary RICE > 500hp at a major source of HAPs and commenced construction prior to December 19, 2002 (initial operation 2/15/2001)						Y
63.6590(b)(3)(iii)	Stationary RICE subject to limited requirements –existing emergency stationary RICE > 500hp located at a major source of HAP emissions.  Exemption from requirements of this subpart and of subpart A of this part						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - G</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-31 Emergency Standby Diesel Generator</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R	FE
63.6600(c)	Emission limitations – stationary RICE > 500hp located at a major source of HAPs  Exemption from emission limitations in Tables 1a, 2a, 2c, 2d, and operating limitations in Tables 1b, 2b– emergency stationary RICE > 500hp located at a major source of HAPs						Y
63.6625	What are my monitoring, installation, collection, operation, and maintenance requirements?  None for existing emergency stationary RICE > 500hp located at a major source of HAP emissions						Y
63.6640(e)	Continuous compliance demonstration  Exemption – emergency stationary RICE > 500hp located at a major source of HAPs						Y
63.6640(f)(2)	Requirements for emergency stationary RICE > 500hp located at a major source of HAPs installed before June 12, 2006						Y
63.6640(f)(2)(i)	No limit on emergency use						Y
63.6640(f)(2)(ii)	Maintenance and readiness testing operation recommended by manufacturer/vendor/insurance company – minimize, but no limit						Y
63.6640(f)(2)(iii)	Additional 50 hours operation for non-emergency situations (not for peak shaving or to generate income)	HOURS OF OPERATION – non-emergency, non-maintenance and testing  50 hours/year					Y
63.6645(a)(5)	What notifications must I submit and when?  Exemption for existing stationary emergency RICE						
63.6655(e)(2)	What records must I keep? – maintenance records demonstrating operation and maintenance according to your						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - G</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-31 Emergency Standby Diesel Generator</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R	FE
	maintenance plan						
63.6660	In what form and how long must I keep my records? 63.10(b)(1) format; 5 years						Y
63.6665	What General Provisions apply to me? Exemption – emergency stationary RICE > 500hp located at a major source of HAPs except initial notification						Y
63.6670	Who implements and enforces this subpart?						Y
63.6675	What definitions apply to this subpart?						Y
<b>BAAQMD Condition # 19947</b>							
Part 1	10.6 hours of reliability related testing and unlimited hours of emergency standby power [Basis: Regulation 2, Rule 5; "Stationary Diesel Engine ATCM" CA Code of Regulations, Title 17, section 93115.6(b)(3)(A)(1)(a)]	10.6 hours/year	BAAQMD Condition # 19947, Part 4	Log/Record keeping P/M	Every six months	Y	Y
Part 2	Operating conditions Basis: [BAAQMD Regulation 9-8-330, "Stationary Diesel Engine ATCM" CA Code of Regulations, Title 17, section 93115.6(b)(3)(A)(1)(a)]						Y
Part 3	Installation of a non-resettable totalizing hour meter [Basis: BAAQMD Regulation 9-8-530, "Stationary Diesel Engine ATCM" CA Code of Regulations, Title 17, section 93115.10(e)(1)]						Y
Part 4	Record keeping requirements [Basis: BAAQMD Regulation 9-8-530, 2-6-501, "Stationary Diesel Engine ATCM" CA Code of Regulations, Title 17, section 93115.10(g)]						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - H</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-32 Flow Jet Pipe Labeler</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
<b>BAAQMD Regulation 8, Rule 4</b>	<b>General Solvent and Surface Coating Operations (10/16/02)</b>						
8-4-302.3	Solvents and Surface Coating Requirements	VOC content of coatings ≤ 3.5 lb/gallon of coating as applied	BAAQMD Condition #21322, Part 4	Record keeping P/M	Once every six months	Y	Y
8-4-312	Solvent Evaporative Loss Minimization						Y
8-4-501	Record keeping requirements						Y
8-4-603	Analysis of Samples						Y
<b>BAAQMD Regulation 8, Rule 19</b>	<b>Surface Preparation and Coating of Miscellaneous Metal Parts and Products (10/16/02)</b>						
8-19-117	Exemption, Stencil Coatings						Y
<b>NESHAP 40 CFR Part 63, Subpart MMM</b>	<b>National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (04/20/06)</b>						
63.3880	What is the purpose of this subpart?						Y
63.3881(a),(b)	Am I subject to this subpart? – facility						Y
63.3882(a),(b)(1)	What parts of my plant does this subpart cover? – coating operation						Y
63.3883(b)	Initial compliance date (January 2, 2007)						Y
63.3890(b)(1)	Emission limit – existing facility general use coating	<u>Organic HAP</u> ≤ 2.6 lb/gal of coating solids used during each 12-month compliance period	§63.3930	Record keeping P/M	Every six months	Y	Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - H</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-32 Flow Jet Pipe Labeler</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
63.3891(a)	Emission limit option – compliant material option	Organic HAP content of each coating used is ≤ §63.3890(2.6 lb HAP/gal coating solids) and each thinner, additive, and cleaning material contains no organic HAP	§63.3930	Record keeping  P/M	Every six months	Y	Y
63.3892	Operating limit – Exemption for compliant material option						Y
63.3893	Work practice standards – Exemption for compliant material option						Y
63.3900(a)(1)	General requirements – compliant material option	Comply with §63.3890	§63.3930	Record keeping  P/M	Every six months	Y	Y
63.3910(b)	Initial Notification –January 1, 2004						Y
63.3910(c)(1)-(3)	Notification of compliance status – name, address, responsible official, reporting period dates						Y
63.3910(c)(4)	Notification of compliance status – Identification of compliance option(s)						Y
63.3910(c)(5)	Notification of compliance status – Achievement of emission limitations for the initial compliance period						Y
63.3910(c)(6)	Notification of compliance status – Deviation reports						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - H</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-32 Flow Jet Pipe Labeler</b>							
<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Limit</b>	<b>Monitoring Citation</b>	<b>Monitoring &amp; Frequency</b>	<b>Reporting</b>	<b>R*</b>	<b>FE</b>
63.3910(c)(7)	Notification of compliance status – Data (mass fraction of HAPs, volume fraction of coating solids, density, waste material and mass of HAPs)						Y
63.3910 (c)(8)(i)	Notification of compliance status – calculation of lb HAP emitted per gallon of coating solids						Y
63.3920(a)	Reporting requirements – semiannual compliance reports						Y
63.3930	Record keeping requirements						Y
63.3931	Records retention – 5 years total, 2 years onsite						Y
63.3940	Initial Compliance demonstration date - §63.3883						Y
63.3941	Initial Compliance demonstration methods						Y
63.3942(a)	Continuous Compliance demonstration	Comply with §63.3890	§63.3930	Record keeping P/M	Every six months	Y	Y
63.3942(b)	Deviation definition for compliant material option						Y
63.3942(c),(d)	Continuous Compliance demonstration – semiannual reports, records						Y
63.3980	Delegation						Y
63.3981	Definitions						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - H</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-32 Flow Jet Pipe Labeler</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Table 2 to Subpart MMMM of Part 63	Applicability of General Provisions						Y
Table 3 to Subpart MMMM of Part 63	Default Organic HAP Mass Fraction for Solvents and Solvent Blends						Y
<b>BAAQMD Condition #21322</b>							
Part 1	Material throughput limit - Ink (Basis: Cumulative Increase)	Ink throughput $\leq 2,500$ gallons/any consecutive 12-month period	BAAQMD Condition #21322, Part 4	Record keeping P/M	Once every six months	Y	Y
Part 2	Material throughput limit – Cleanup Solvent (Basis: Cumulative Increase)	Cleanup Solvent $\leq 1,000$ gallons/any consecutive 12-month period	BAAQMD Condition #21322, Part 4	Record keeping P/M	Once every six months	Y	Y
Part 3	Material Options – POC limit, NPOC limit (Basis: Cumulative Increase)	POC = 0 lb/year NPOC $\leq 22,880$ lb/ any consecutive 12-month period	BAAQMD Condition #21322, Part 4	Record keeping P/M	Once every six months	Y	Y
Part 4	Record keeping requirements (Basis: Cumulative Increase, Regulation 2-5)						Y



#### IV. Source-Specific Applicable Requirements

<b>Table IV - I</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-14 Fittings Dip Barrel</b> <b>S-34 Pipe Finishing Dip Tank (P2, P3)</b> <b>S-35 Pipe Finishing Dip Tank (P4)</b> <b>S-36 Pipe Finishing Dip Tank (P5, P6)</b> <b>S-43 Pipe Finishing Dip Tank (P1)</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
<b>BAAQMD Regulation 8, Rule 19</b>	<b>Surface Preparation and Coating of Miscellaneous Metal Parts and Products (10/16/02)</b>						
8-19-302.2	Solvents and Surface Coating Requirements	VOC content of coatings 2.8 lb/gallon of coating applied, excluding water	BAAQMD Condition #24639, Part 11	Record keeping P/M	Once every six months	Y	Y
8-19-320	Solvent Evaporative Loss Minimization						Y
8-19-501	Record keeping requirements						Y
8-19-601	Analysis of Samples						Y
<b>NESHAP 40 CFR Part 63, Subpart MMM</b>	<b>National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (04/20/06)</b>						
63.3880	Purpose						Y
63.3881(a),(b)	Applicability - facility						Y
63.3882(a),(b)(1)	Applicability – coating operation						Y
63.3883(b)	Initial compliance date (January 2, 2007)						Y
63.3890(b)(1)	Emission limit – existing facility general use coating	<u>Organic HAP</u> ≤ 2.6 lb/gal of coating solids used during each 12-month compliance period	§63.3930	Record keeping P/M	Every six months	Y	Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - I</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-14 Fittings Dip Barrel</b> <b>S-34 Pipe Finishing Dip Tank (P2, P3)</b> <b>S-35 Pipe Finishing Dip Tank (P4)</b> <b>S-36 Pipe Finishing Dip Tank (P5, P6)</b> <b>S-43 Pipe Finishing Dip Tank (P1)</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
63.3891(a)	Emission limit option – compliant material option	Organic HAP content of each coating used is ≤ §63.3890 (≤ 2.6 lb/gal of coating solids) and each thinner, additive, and cleaning material contains no organic HAP	§63.3930	Record keeping  P/M	Every six months	Y	Y
63.3892	Operating limit – Exemption for compliant material option						Y
63.3893	Work practice standards – Exemption for compliant material option						Y
63.3900(a)(1)	General requirements – compliant material option	Comply with §63.3890	§63.3930	Record keeping  P/M	Every six months	Y	Y
63.3910(b)	Initial Notification – January 1, 2004						Y
63.3910(c)(1)-(3)	Notification of compliance status – name, address, responsible official, reporting period dates						Y
63.3910(c)(4)	Notification of compliance status – Identification of compliance option(s)						Y
63.3910(c)(5)	Notification of compliance status – Achievement of emission limitations for the initial compliance period						Y

**IV. Source-Specific Applicable Requirements**

<b>Table IV - I</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-14 Fittings Dip Barrel</b> <b>S-34 Pipe Finishing Dip Tank (P2, P3)</b> <b>S-35 Pipe Finishing Dip Tank (P4)</b> <b>S-36 Pipe Finishing Dip Tank (P5, P6)</b> <b>S-43 Pipe Finishing Dip Tank (P1)</b>							
<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Limit</b>	<b>Monitoring Citation</b>	<b>Monitoring &amp; Frequency</b>	<b>Reporting</b>	<b>R*</b>	<b>FE</b>
63.3910(c)(6)	Notification of compliance status – Deviation reports						Y
63.3910(c)(7)	Notification of compliance status – Data (mass fraction of HAPs, volume fraction of coating solids, density, waste material and mass of HAPs)						Y
63.3910 (c)(8)(i)	Notification of compliance status – calculation of lb HAP emitted per gallon of coating solids						Y
63.3920(a)	Reporting requirements – semiannual compliance reports						Y
63.3930	Record keeping requirements						Y
63.3931	Records retention – 5 years total, 2 years onsite						Y
63.3940	Initial Compliance demonstration date - §63.3883						Y
63.3941	Initial Compliance demonstration methods						Y
63.3942(a)	Continuous Compliance demonstration	Comply with §63.3890	§63.3930	Record keeping P/M	Every six months	Y	Y
63.3942(b)	Deviation definition for compliant material option						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - I</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-14 Fittings Dip Barrel</b> <b>S-34 Pipe Finishing Dip Tank (P2, P3)</b> <b>S-35 Pipe Finishing Dip Tank (P4)</b> <b>S-36 Pipe Finishing Dip Tank (P5, P6)</b> <b>S-43 Pipe Finishing Dip Tank (P1)</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
63.3942(c),(d)	Continuous Compliance demonstration – semiannual reports, records						Y
63.3980	Delegation						Y
63.3981	Definitions						Y
Table 2 to Subpart MMMM of Part 63	Applicability of General Provisions						Y
Table 3 to Subpart MMMM of Part 63	Default Organic HAP Mass Fraction for Solvents and Solvent Blends						Y
<b>BAAQMD Condition #24639</b>	<b>For S-34, S-35, S-36, S-43</b>						
Part 1	Material throughput limit for S-34, S-35, S-36 and S-43 combined (Basis: Cumulative Increase, Offsets, Toxics)	Synthetic asphalt pipe coating throughput ≤ 251,442 gallons (1,090 tons)/any consecutive 12-month period	BAAQMD Condition #24639, Part 11	Record keeping P/M	Once every six months	Y	Y
Part 2	Material throughput limit for S-43 (Basis: Cumulative Increase)	Synthetic asphalt pipe coating throughput ≤ 2,000 gallons/any consecutive 12-month period	BAAQMD Condition #24639, Part 11	Record keeping P/M	Once every six months	Y	Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - I</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-14 Fittings Dip Barrel</b> <b>S-34 Pipe Finishing Dip Tank (P2, P3)</b> <b>S-35 Pipe Finishing Dip Tank (P4)</b> <b>S-36 Pipe Finishing Dip Tank (P5, P6)</b> <b>S-43 Pipe Finishing Dip Tank (P1)</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 3	Specification of material - Synthetic asphalt pipe coating (Basis: Cumulative Increase)	VOC limit ≤ 0.04 lb/gallon	BAAQMD Condition #24639, Part 11	Record keeping  P/M	Once every six months	Y	Y
Part 4	Abatement requirement – S-34, S-35, S-36 abated by A-35 (Basis: Cumulative Increase)						Y
Part 5	A-35 pressure gauge and operation and maintenance requirement (Basis: Cumulative Increase)						Y
Part 6	Hot dip operating temperature limit (S-34, S-35, S-36, S-43) (Basis: Cumulative Increase, Toxics)	Coating Temperature Limit ≤ 500 degrees F	BAAQMD Condition #24639, Part 7	Record keeping  P/M	Once every six months	Y	Y
Part 7	Temperature measuring and recording device requirement for each S-34, S-35, S-36, S-43						Y
Part 8	Prohibition on cleanup solvent (Basis: Cumulative Increase)						Y
Part 9	Odor Abatement Plan requirement for S-43 if one District-confirmed odor complaint						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - I</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b> <b>S-14 Fittings Dip Barrel</b> <b>S-34 Pipe Finishing Dip Tank (P2, P3)</b> <b>S-35 Pipe Finishing Dip Tank (P4)</b> <b>S-36 Pipe Finishing Dip Tank (P5, P6)</b> <b>S-43 Pipe Finishing Dip Tank (P1)</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 10	Comprehensive Odor Abatement Plan requirement if public nuisance under BAAQMD 1-301						Y
Part 11	Record keeping requirements of net usage of asphalt coating at each S-34, S-35, S-36, S-43 (Basis: Record keeping)						Y
Part 11a	Record keeping requirements Operating hours of S-34, S-35, S-36, S-43 (Basis: Record keeping)						Y
Part 11b	Record keeping requirements Operating hours of A-35 (Basis: Record keeping)						Y
Part 11c	Maintenance Records for A-35 (Basis: Record keeping)						Y
Part 12	Shutdown requirement for cutback asphalt dip tanks (Basis: Contemporaneous emission reduction credits)						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - J</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-38 Vertical Asphalt Storage Tank #1 (exempt)</b> <b>S-39 Vertical Asphalt Storage Tank #2 (exempt)</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
<b>BAAQMD Regulation 2, Rule 1</b>							
2-1-123.3.7	Exemption from permit requirements (storage of asphalt with a sulfur content < 0.5%)						Y
<b>BAAQMD Regulation 8, Rule 5</b>	<b>Storage of Organic Liquids (10/18/06)</b>						
8-5-117	Limited Exemption, Low Vapor Pressure ( $\leq 0.5$ psia)						N
<b>SIP Regulation 8, Rule 5</b>	<b>Storage of Organic Liquids (06/05/03)</b>						
8-5-117	Limited Exemption, Low Vapor Pressure ( $\leq 0.5$ psia)						Y
<b>NESHAP 40 CFR Part 63, Subpart MMMM</b>	<b>National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (04/20/06)</b>						
63.3880	Purpose						Y
63.3881(a),(b)	Applicability - facility						Y
63.3882(a), (b)(2)	Applicability – storage containers and mixing vessels of coatings, thinners						Y
63.3883(b)	Initial compliance date (January 2, 2007)						Y
63.3893	Work practice standards – Exemption for compliant material option						Y

#### IV. Source-Specific Applicable Requirements

<b>Table IV - J</b> <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b> <b>Compliance Monitoring Requirements</b> <b>S-38 Vertical Asphalt Storage Tank #1 (exempt)</b> <b>S-39 Vertical Asphalt Storage Tank #2 (exempt)</b>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
63.3910(b)	Initial Notification – January 1, 2004						Y
63.3910(c)(1)-(3)	Notification of compliance status – name, address, responsible official, reporting period dates						Y
63.3910(c)(4)	Notification of compliance status – Identification of compliance option(s)						Y
63.3910(c)(5)	Notification of compliance status – Achievement of emission limitations for the initial compliance period						Y
63.3910(c)(6)	Notification of compliance status – Deviation reports						Y
63.3910(c)(7)	Notification of compliance status – Data (mass fraction of HAPs, volume fraction of coating solids, density, waste material and mass of HAPs)						Y
63.3910(c)(8)(i)	Notification of compliance status – calculation of lb HAP emitted per gallon of coating solids						Y
63.3920(a)	Reporting requirements – semiannual compliance reports						Y
63.3930	Record keeping requirements						Y
63.3931	Records retention – 5 years total, 2 years onsite						Y
63.3942(b)	Deviation definition for compliant material option						Y
63.3942(c),(d)	Continuous Compliance demonstration – semiannual reports, records						Y
63.3980	Delegation						Y
63.3981	Definitions						Y
Table 2 to Subpart MMMM of Part 63	Applicability of General Provisions						Y



**IV. Source-Specific Applicable Requirements**

<p align="center"><b>Table IV - J</b>  <b>Source-specific Applicable Requirements, Applicable Limits &amp;</b>  <b>Compliance Monitoring Requirements</b>  <b>S-38 Vertical Asphalt Storage Tank #1 (exempt)</b>  <b>S-39 Vertical Asphalt Storage Tank #2 (exempt)</b></p>							
<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Limit</b>	<b>Monitoring Citation</b>	<b>Monitoring &amp; Frequency</b>	<b>Reporting</b>	<b>R*</b>	<b>FE</b>
Table 3 to Subpart MMMM of Part 63	Default Organic HAP Mass Fraction for Solvents and Solvent Blends						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.

### 1. Compliance with BAAQMD Regulation 2-1-424: Loss of Exemption or Exclusion and SIP Regulation 2-1-424: Loss of Exemption

S-7, S-8, S-9, S-10 Automatic Pouring Furnaces  
S-46 Storage Bunker  
S-47 Storage Piles  
P2-P4 Slurry mix stations

#### Compliance Milestones

By April 20, 2012:

The owner/operator shall submit a complete NSR permit application and a minor revision Title V application for the existing sources listed above. The sources listed above have been in operation at the facility since prior to 1972, but were previously exempt from permit requirements.

### 2. Compliance with BAAQMD Regulation 2-1-301: Authority to Construct and 2-1-302 Permit to Operate

Specialty Finishing Paint Dip Tank (Iron Weights)

#### Compliance Milestones

By April 20, 2012:

The owner/operator shall submit a complete NSR permit application and a minor revision Title V application for the existing source listed above. The source listed above was installed and is operating without a permit.

### 3. Compliance with BAAQMD Regulation 2-1-301: Authority to Construct

- a. AB&I self-reported completing a project (DISA project) involving modifying the shakeout portion of S-2 Pouring, Cooling, Shakeout without permits. The physically modified source consists of the pouring, cooling, shakeout lines of greensand molds. The mold-making machine (DISA), rotary drum (DIDION), and associated conveyors were replaced and an aerator was installed to condition the sand. Below is a timeline of the modifications included in this project:
  - Dec. 2004 – Replaced DIDION MD200 with DIDION MD300 (on DISA 2070)
  - Dec. 2004 – Replaced oscillator pans and added new pans – MD300
  - Mar. 2005 – Replaced DISA 2070 with DISA 270
  - Mar. 2005 – Installed aerator on DISA 270
  - 2007 – Installed new gearbox on DIDION MD300

## V. Schedule of Compliance

With this DISA project, AB&I anticipated an increase to the metal castings limit of 36,000 tons in BAAQMD permit condition #2237 to 40,000 tons metal castings/year. The increases in emissions were less than the PSD significance levels. The source "S-2" will be shutdown following the permitting of S-40, S-42, S-41, and S-48, since these sources are part of the pouring, cooling, shakeout lines. The following sources are considered modified per BAAQMD Regulation 2-1-234(except for the exempt sources, listed here for completeness) due to the increase in annual throughput and BACT will apply for the following pollutants per BAAQMD Regulation 2-2-301.

- DISA Pouring and Cooling, part of S-2; to be identified as S-40, S-42: District BACT for VOC and CO
  - 270A Shakeout and DIDION MD300, part of S-2; to be identified as S-48: District BACT for PM, VOC and CO
  - 2013 Shakeout and DIDION MD100, part of S-2; to be identified as S-41: District BACT for PM, VOC and CO
  - Sand Preparation, S-3: District BACT for PM
  - Shotblasting, S-4, S-5, S-27, S-30: District BACT for PM
  - Dip Barrel, S-14: District BACT for VOC
  - Casting Grinding: Exempt from District permits and BACT per BAAQMD 2-1-121.1
  - Shell coremaking: Exempt from District permits and BACT per BAAQMD 2-1-122.3
  - DISA 270A Moldmaking: Exempt from District permits and BACT per BAAQMD 2-1-122.2
- b. AB&I self-reported completing a second project (Centrifugal Casting project) involving modifying the existing pipe casting machines without permits. The physically modified source consists of six permanent mold lines used to make pipes by pouring molten metal into the mold core as the permanent mold rotates around its axis (centrifugal casting) and allows the metal to cool and solidify. The following modifications resulted in an increased hourly metal pipe cast rate from 26.62 ton/hr to 28.89 ton/hr and are included in this project:
- Jan 1998 - Added 3rd barrel to pipe machine P-2
  - Jan 1999 - Replaced base on pipe machine P-1 (from 12" to 15" pipe diameter capacity)
  - Aug 2002 - Changed pipe machine P-4 to accommodate two - 10" pipes (from two - 8" pipes)

The increases in emissions from this project were greater than the major modification significance levels for VOC due to a downstream affected source, the asphalt dip tanks (previously S-13). The District is nonattainment status for ozone means VOC is evaluated under nonattainment NSR, administered through the District's SIP-approved program.

The asphalt dip tanks have since been replaced by a low-emitting alternative (NSR Application #21488). The physically modified source, the pipe machines, is a minor source of VOCs and will be subject to District BACT requirements. The following sources are considered modified per BAAQMD Regulation 2-1-234 due to the increase in potential daily throughput and BACT will apply for the following pollutants per BAAQMD Regulation 2-2-301.

- Pipe Machines, S-44: District BACT for VOC, District BACT for PM

## V. Schedule of Compliance

- Asphalt Dip Tanks, S-34, 35, 36, 43: District BACT for VOC - Evaluated and applied District BACT for VOC in 2010 when cut asphalt dip tanks were replaced with hot asphalt dip tanks
- Pipe Grinding: District BACT for PM

### c. Compliance Milestones

- i) By April 27, 2012:
  - a. The owner/operator shall submit emissions calculations (baseline and potential to emit for criteria pollutants and toxic air contaminants) for the DISA project and for the Pipe Machine project based on BAAQMD Regulation 2-2-604. The owner/operator shall provide documentation for all emission factors and assumptions used in the emission calculations.
  - b. The owner/operator shall submit a preliminary California Environmental Quality Act (CEQA) analysis and PSD applicability analysis for the DISA project and for the Pipe Machine project.
  
- ii) By May 11, 2012:
  - a. The owner/operator shall submit detailed descriptions, manufacturer specifications and design drawings with capacities identified for all new or modified equipment related to these projects.
  - b. The owner/operator shall submit a preliminary BACT analysis with proposed emission limits and technology for the DISA project and for the Pipe Machine project. The analysis shall include cost information (capital and annual operation/maintenance costs) for the proposed control technology.
  - c. The owner/operator shall submit a separate analysis with a description of the control technology and cost information for control of emissions at the time the modifications took place. For example, in 2002 when the pipe machine project was completed, the alternative materials control (hot asphalt) may not have been available and capture and control to a thermal oxidizer would have been the available control technology. Cost information for the available capture and control should be included in the analysis.
  - d. The owner/operator shall submit a complete NSR permit application and an application for a minor revision to the Title V permit for the DISA project and for the Pipe Machine project listed above. The application shall include, but is not limited to, Data Forms for each source, emissions calculations (baseline and potential to emit for criteria pollutants and toxic air contaminants), BACT analysis, California Environmental Quality Act (CEQA) analysis, PSD applicability analysis, Title V forms, updated Title V permit Table IV for each source, and applicable fees. If the District or EPA has provided comments regarding the documents listed above, the owner/operator shall incorporate the comments into the complete application.

## V. Schedule of Compliance

### 4. Compliance with BAAQMD Regulation 2-1-301: Authority to Construct and 40 CFR Part 52.21

AB&I self-reported completing a third project (Cupola project) involving modifying the existing cupola and the charge handling to the cupola without permits. The physically modified sources consist of the cupola and charge handling to the cupola that occurred in July and August, 2006. The maximum hourly throughput at the cupola increased from 50 tons/hr to 60 tons/hr, which also increased the maximum daily throughput. AB&I is proposing to maintain the annual throughput limit at the cupola in condition #9351. The following is a list of modifications included in this project.

- The speed of the charge bucket gearbox and cable (“charge handling”) were increased.
- Cupola natural gas-fired hot blast was replaced by recuperative hot blast
- Hot blast 350 HP motor was replaced by a 400 HP VFD motor
- Cupola baghouse was replaced (NSR Application #13813)
- Cupola afterburners were replaced (NSR Applications #14757 and #18833)

The increases in emissions from the Cupola project are greater than the major modification significance levels for PM, PM10, and VOC. Since the District is in attainment status for PM10 and nonattainment status for ozone, PM10 will be evaluated under the PSD program and VOC will be evaluated under nonattainment NSR program administered through the District’s SIP-approved program. Consequently, applications will be required for the following sources that were either modified or affected (i.e., saw emissions increases due to debottlenecked capacity):

- Charge handling, S-45: PSD BACT and District BACT for PM
- Cupola, S-1: PSD BACT and District BACT for PM, District BACT for VOC, SO<sub>x</sub>, NO<sub>x</sub>, and CO
- Holding furnace, S-25: District BACT for PM

AB&I maintains that the bottleneck at the facility is the cupola. The following sources are considered modified per BAAQMD Regulation 2-1-234 due to the increase in potential daily throughput and BACT will be applied for the following pollutants per BAAQMD Regulation 2-2-301 in the District permit applications submitted in the Schedule of Compliance item #2 above.

- Pipe Machines, S-44: District BACT for VOC, District BACT for PM
- Asphalt Dip Tanks, S-34, 35, 36, 43: District BACT for VOC - Evaluated and applied District BACT for VOC in 2010 when cut asphalt dip tanks were replaced with hot asphalt dip tanks
- Pipe Grinding: District BACT for PM
- DISA (sand mold casting operation) pouring and cooling: District BACT for VOC and CO
- DISA Pouring and Cooling, part of S-2; to be identified as S-40, S-42: District BACT for VOC and CO
- 270A Shakeout and DIDION MD300, part of S-2; to be identified as S-48: District BACT for PM, VOC and CO
- 2013 Shakeout and DIDION MD100, part of S-2; to be identified as S-41: District

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BACT for PM, VOC and CO

- Sand Preparation, S-3: District BACT for PM
- Shotblasting, S-4, S-5, S-27, S-30: District BACT for PM
- Dip Barrel, S-14: District BACT for VOC
- Casting Grinding: Exempt from District permits and BACT per BAAQMD 2-1-121.1
- Shell coremaking: Exempt from District permits and BACT per BAAQMD 2-1-122.3
- DISA 270A Moldmaking: Exempt from District permits and BACT per BAAQMD 2-1-122.2

### Compliance Milestones

i) By June 15, 2012:

- a. The owner/operator shall submit an outline BACT analysis with proposed emission limits and technology for the Cupola project. The analysis shall include cost information (capitol and annual operation/maintenance costs) for the proposed control technology.
- b. The owner/operator shall submit PSD emissions calculations (baseline and potential to emit) for the Cupola project for PSD pollutants. The owner/operator shall also submit emission calculations based on BAAQMD Regulation 2-2-604 for nonattainment pollutants, minor sources, and toxic air contaminants. The owner/operator shall provide documentation for all emission factors and assumptions used in the emission calculations.

ii) By May 18, 2012:

The owner/operator shall contact District staff for guidance on modeling required under 40 CFR Part 52.21.

iii) By June 8, 2012:

The owner/operator shall submit a preliminary California Environmental Quality Act (CEQA) analysis and PSD applicability analysis for the Cupola project.

iv) By July 1, 2012:

The owner/operator shall submit a progress report to the District detailing the status of each section of the PSD application.

v) By August 1, 2012:

The owner/operator shall submit a complete NSR and PSD application, and an application for a significant revision to the Title V permit for the Cupola project listed above. The application shall include, but is not limited to, Data Forms for each source, emissions calculations (baseline and potential to emit for criteria pollutants and toxic air contaminants), BACT analysis, California Environmental Quality Act (CEQA) analysis, PSD analysis, Title V forms, updated Title V permit Table IV for each source, and applicable fees. The application shall include detailed descriptions, manufacturer specifications and design drawings with capacities identified for all new or modified equipment related to this project.

## VI. PERMIT CONDITIONS

All conditions are federally enforceable.

### A. Source-Specific Permit Conditions

#### Condition #2237

#### S-3 Sand Preparation

1. [Deleted. Iron casting limit moved to condition for pouring.]
2. S-3 Sand Preparation shall be continuously abated by A-15 Baghouse#1, Pulse Jet, U.S. Air Filtration Model 4614-PT-120-6, during all periods of operation of S-3. (basis: cumulative increase)
3. The owner/operator shall maintain A-15 Baghouse#1 in good operating condition at all times according to manufacturers' and /or District recommendations. (basis: cumulative increase)
4. The outlet grain loading of A-15 Baghouse#1 shall not exceed 0.04 gr/dscf. (basis: cumulative increase)
5. The owner/operator shall maintain monthly records of good iron casting production in a District-approved log. These records shall be retained on site for a minimum of five years from the date of entry and made available to District representatives upon request. (basis: cumulative increase, BAAQMD Regulation 2-6-501)
6. [Deleted, replaced by CAM condition]
7. [Deleted, replaced by CAM condition]
8. [Deleted, redundant throughput limit]
9. The annual gross sand throughput at S-3 Sand Preparation shall not exceed 572,000 tons totaled over any consecutive twelve month period.
10. Unless otherwise indicated in specific permit conditions, the operator shall maintain the following records for S-3 Sand Preparation:
  - a. monthly sand throughput
  - b. total sand throughput for the preceding 12 months  
(basis: Regulation 2-1-403)

## VI. Permit Conditions

### Condition #9351

#### Conditions for S-1 CUPOLA:

abated by A-20 Afterburner, A-22 Afterburner and A-19 Baghouse

Application 13813, January 18, 2006

Application 14757, October 6, 2006

Application 18833, November 2008

1. The owner/operator of S-1 Cupola shall operate the A-20 and A-22 Afterburners such that the 15-minute average combustion zone temperature does not fall below 1300 degrees F. Periods when the cupola is off blast and for 15 minutes after going on blast from an off blast condition are not included in the 15-minute average. (basis: 40 CFR 63.7690 (b)(3))
2. To demonstrate compliance with part 1, the owner/operator of S-1 shall install, operate, and maintain a continuous temperature monitor and recorder to measure and record the combustion zone temperature of A-20 and A-22. (basis: Regulation 1-521)
3. The owner/operator shall retain the temperature records required in part 2 on site for a minimum of five years from the date of record and made available to District representatives upon request.  
(basis: cumulative increase, BAAQMD Regulation 2-6-501)
4. The sulfur content of the coke used at S-1, Cupola, shall not exceed 1.0 percent by weight as a surrogate means for ensuring compliance with BAAQMD Regulation 9-1-304. The owner/operator will obtain a certification of the sulfur content of the coke for each delivery to assure compliance with this condition. The fuel certification records shall be retained on site for a minimum of five years from the date of entry and be made available to District representatives upon request. In the event the coke sulfur content exceeds 1.0 percent by weight, the owner/operator shall arrange for a one time source test of S-1 at the time said coke is used to demonstrate that higher level of coke sulfur content will not produce gas stream emissions at A-19 Baghouse that will exceed the limit established in BAAQMD Regulation 9-1-304.

If the sulfur dioxide emissions do not exceed the limit, the owner/operator shall be allowed to use coke with a sulfur content at or below the sulfur content of the coke used for the source test. In the event the coke sulfur content exceeds the new limit for coke sulfur content established in the source test, the owner/operator shall again arrange for a one time source test of S-1 at the time said coke is used to demonstrate that higher level of coke sulfur content will not produce gas stream emissions at A-19 Baghouse that will exceed the limit established in BAAQMD Regulation 9-1-304.

The owner/operator shall notify the Source Test Group at the BAAQMD at least seven days before any source test is performed. (basis: BAAQMD Regulation 9-1-304, BAAQMD Regulation 2-6-501)



## VI. Permit Conditions

5. [Deleted, replaced by CAM condition]
6. [Deleted, replaced by CAM condition]
7. The annual gray iron throughput for S-1 Cupola shall not exceed 172,800 tons totaled over any consecutive twelve month period. (basis: Regulation 2-1-403)
8. Unless otherwise indicated in specific permit conditions, the operator shall maintain the following records for each permitted source:
  - a. monthly material throughput, including charge material to the cupola for S-1 and natural gas to the A-20 and A-22 afterburners
  - b. total material throughput for the preceding 12 months  
(basis: Regulation 2-1-403)
9. The owner/operator shall ensure that the firing rate of the A-20 Afterburner shall not exceed 8 million Btu/hour. (basis: Cumulative Increase)
10. The owner/operator shall ensure that the firing rate of the A-22 Afterburner shall not exceed 8 million Btu/hour. (basis: Cumulative Increase)
11. The owner/operator shall perform District-approved source tests at least once every 5 years for PM, opacity, CO, VOC, SO<sub>2</sub>, NO<sub>x</sub>, lead. The owner/operator shall obtain approval for all source test procedures from the District's Source Test Section prior to conducting any tests. The owner/operator shall comply with all applicable testing requirements as specified in Volume V of the District's Manual of Procedures. The owner/operator shall notify the District's Source Test Section in writing of the source test protocols and projected test dates at least 7 days prior to testing. All measurements, records, and data for each source test shall be retained by the owner/operator for at least five years and made available to the District upon request. (basis: Regulation 2-1-403)

### **Condition #9668**

Conditions for **S-25 HOLDING FURNACE**

Application 14438, June 15, 2006

Amended by Application 17123, May 2008, Replacement of A-10 with A-25

1. The owner/operator shall ensure S-25 Holding Furnace and its associated charging launder are abated by A-25 Fume Baghouse at all times of operation of S-25. (basis: cumulative increase)
2. The owner/operator shall ensure A-25 Fume Baghouse is maintained in good operating conditions at all times of operation of S-25 according to manufacturer's recommendations. (basis: cumulative increase)
3. The owner/operator shall equip A-25 Fume Baghouse with a District approved broken bag detection device equivalent to a Triboflow leak detector device, which shall include an alarm that is triggered when the device signals the current has exceeded 70% maximum allowable

## VI. Permit Conditions

- current limit. If the alarm is triggered, the owner/operator shall perform a Method 22 test within one hour of the alarm. Except for a 20 minute period after equipment startup and shutdown, if emissions are observed per Method 22, then the owner/operator shall record the event as an exceedance in a District-approved log. Any exceedance shall also be reported to the Director of Compliance and Enforcement. (Basis: Cumulative Increase)
4. The owner/operator shall ensure the outlet PM10, as defined in Regulation 2, Rule 1, grain loading for A-25 Fume Baghouse does not exceed 0.002 grains per dry standard cubic foot. (Basis: Cumulative Increase)
  5. The owner/operator of S-25 shall maintain weekly records of preventive maintenance inspections of A-25 Fume Baghouse. The preventive maintenance inspection reports shall be retained on site for a minimum of five years from the date of entry and be made available to District representatives upon request. (basis: BAAQMD Regulation 6-1-301, BAAQMD Regulation 2-6-501)
  6. The owner/operator shall ensure annual gray iron throughput for S-25 Holding Furnace does not exceed 172,800 tons totaled over any consecutive twelve month period. (basis: Regulation 2-1-403)
  7. Unless otherwise indicated in specific permit conditions, the operator shall maintain the following records for S-25 Holding Furnace:
    - a. monthly material throughput
    - b. total material throughput for the preceding 12 months(basis: Regulation 2-1-403)
  8. The owner/operator shall perform source tests for the above sources and their associated abatement devices at least once every 5 years to demonstrate with compliance with the limit in Part 4 and the opacity limit in Regulation 6-1-301. This source test will also be used to demonstrate compliance with the Regulation 6-1-310 and 6-1-311. The owner/operator shall obtain approval for all source test procedures from the District's Source Test Section prior to conducting any tests. The owner/operator shall comply with all applicable testing requirements as specified in Volume V of the District's Manual of Procedures. The owner/operator shall notify the District's Source Test Section, in writing, of the source test protocols and projected test dates at least 7 days prior to testing. All measurements, records and data required to be maintained by the owner/operator shall be retained and made available for inspection by the District for at least five years. (Basis: Regulation 2-1-403)

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### Condition #10139

For S-4 Wheelabrator Shot Blast (No. 1)

S-5 Pangborn Shot Blast (No. 2)

S-27 Wheelabrator Shot Blast (No. 3)

1. The owner/operator shall ensure the total shot throughput at S-27 Wheelabrator Shot Blast (No. 3) does not exceed 36 tons in any consecutive twelve month period. (basis: cumulative increase)
2. The owner/operator shall abate S-4 Wheelabrator Shot Blast (No. 1), S-5 Pangborn Shot Blast (No. 2), and S-27 Wheelabrator Shot Blast (No. 3) with A-17 Baghouse#3 during all periods of operation. (basis: cumulative increase)
3. [Deleted, replaced by CAM condition]
4. [Deleted, replaced by CAM condition]
5. The owner/operator of S-27 shall maintain records of shot throughput on a monthly basis in a District-approved log. These records shall be retained on site for a minimum of five years from the date of entry and made available to District personnel upon request. (basis: cumulative increase, BAAQMD Regulation 2-6-501)
6. The owner/operator shall ensure the total gross blast media throughput for S-4 Wheelabrator Shot Blast (1) does not exceed 4,600 tons totaled over any consecutive twelve-month period. (basis: Regulation 2-1-403)
7. The owner/operator shall ensure the total gross blast media throughput for S-5 Pangborn Shot Blast (2) does not exceed 2,800 tons totaled over any consecutive twelve-month period. (basis: Regulation 2-1-403)
8. Unless otherwise indicated in specific permit conditions, the operator shall maintain the following records for S-4 and S-5:
  - a. monthly shot blast media throughput
  - b. total shot blast media throughput for the preceding 12 months(basis: Regulation 2-1-403)

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### Condition #10762

#### For S-28 STORAGE SILO (BAGHOUSE DUST)

1. All particulate matter emissions from S-28 Storage Silo shall be routed to A-19 Cupola Baghouse. (basis: cumulative increase)
2. [Deleted. Replaced by CAM condition]
4. [Deleted. Replaced by CAM condition]
4. [Deleted. Replaced by CAM condition]
5. [Deleted. Replaced by CAM condition]
6. The throughput for S-28 Storage Silo shall not exceed 1500 tons totaled over any consecutive twelve month period. (basis: Regulation 2-1-403)
7. Unless otherwise indicated in specific permit conditions, the operator shall maintain the following records for S-28 Storage Silo:
  - a. monthly material throughput
  - b. total material throughput for the preceding 12 months (basis: Regulation 2-1-403)

These records shall be retained on-site for a minimum of five years from the date of entry and made available to District representatives upon request.

### Condition #13298

#### Conditions for S-30 Inline Shot Blast abated by A-17 Pulse Jet Baghouse #3

1. Gross blast media throughput at S-30 Inline Shot Blast shall not exceed 105 tons during any consecutive twelve month period.  
(Basis: Cumulative Increase)
2. S-30 shall be abated by the properly maintained and operated A-17 Pulse Jet Baghouse #3 whenever S-30 is in operation. (Basis: Cumulative Increase)
3. The owner/operator of S-30 shall maintain records of blast media throughput on a monthly basis in a District-approved log. These records shall be retained on site for a minimum of two years from the date of entry and made available to District personnel upon request.  
(Basis: Regulation 2-1-403)

## VI. Permit Conditions

### Condition #19947

#### Conditions for S-31 Emergency Standby Diesel Generator

1. The owner/operator shall not exceed 10.6 hours per year per engine for reliability-related testing. [Basis: Regulation 2, Rule 5; "Stationary Diesel Engine ATCM", CA Code of Regulations, Title 17, Section 93115.6(b)(3)(A)(1)(a)]
2. The owner or operator shall operate each emergency standby engine only for the following purposes: to mitigate emergency conditions, for emission testing to demonstrate compliance with a District, state or Federal emission limit, or for reliability-related activities (maintenance and other testing, but excluding emission testing). Operating while mitigating emergency conditions or while emission testing to show compliance with District, state or Federal emission limits is not limited. [Basis: BAAQMD Regulation 9-8-330, "Stationary Diesel Engine ATCM", CA Code of Regulations, Title 17, Section 93115.6(b)(3)(A)(1)(a)]
3. The owner/operator shall operate each emergency standby engine only when a non-resettable totalizing meter (with a minimum display capability of 9,999 hours) that measures the hours of operation for the engine is installed, operated and properly maintained. [Basis: BAAQMD Regulation 9-8-530, "Stationary Diesel Engine ATCM", CA Code of Regulations, Title 17, Section 93115.10(e)(1)]
4. Records: The owner/operator shall maintain the following monthly records in a District-approved log for at least 36 months from the date of entry (60 months if the facility has been issued a Title V Major Facility Review Permit or a Synthetic Minor Operating Permit). Log entries shall be retained on-site, either at a central location or at the engine's location, and made immediately available to the District staff upon request.
  - a. Hours of operation for reliability-related activities (maintenance and testing).
  - b. Hours of operation for emission testing to show compliance with emission limits.
  - c. Hours of operation (emergency).
  - d. For each emergency, the nature of the emergency condition.
  - e. Fuel usage for each engine(s).[Basis: BAAQMD Regulation 9-8-530, 2-6-501, and "Stationary Diesel Engine ATCM", CA Code of Regulations, Title 17, Section 93115.10(g)]

### Condition #21322

#### Conditions for S-32

1. The owner/operator shall ensure that the net ink (SCP-920) usage at S-32 Flow Jet Pipe Labeler does not exceed 2500 gallons totaled over any consecutive twelve month period. (Basis: Cumulative Increase)
2. The owner/operator shall ensure that the net cleanup solvent (SCP-900C) usage at S-32 Flow Jet Pipe Labeler does not exceed 1000 gallons totaled over any consecutive twelve month period. (Basis: Cumulative Increase)

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3. Inks and cleanup solvents other than those specified in parts 1 and 2 may be used at S-32 provided that the owner/operator can demonstrate that all of the following requirements are satisfied:
  - a. Total POC emissions from S-32 do not exceed 0 pounds totaled over any consecutive 12 month period.
  - b. Total NPOC emissions from S-32 do not exceed 22,880 pounds totaled over any consecutive 12 month period.
  - c. The use of these materials does not result in the emission of any toxic air contaminant above its risk screening trigger level as specified in the BAAQMD Regulation 2, Rule 5.(Basis: Cumulative Increase, BAAQMD Regulation 2-5)

4. The owner/operator shall maintain the following records to demonstrate compliance with the above conditions:
  - a. Type, POC content, NPOC content, and monthly usage of all POC and NPOC containing materials used at S-32
  - b. For materials other than those specified in parts 1 and 2 that are utilized at S-32: toxic air contaminant contents of each material used and mass emission calculations to demonstrate compliance with part 3, summarized on a monthly basis
  - c. Monthly usage and/or emission calculations shall be totaled for each consecutive twelve-month period (basis: Cumulative Increase, BAAQMD Regulation 2-5)

### **Condition # 23650**

For S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse#2, A-18 Baghouse#4, and A-21 Baghouse#5

1. The owner/operator shall abate S-2 Pouring, Cooling, Shakeout with A-14 Baghouse#2, A-21 Baghouse#5, and A-18 Baghouse#4 during all periods of operation. (basis: cumulative increase)
2. [Deleted. Replaced by CAM condition]
3. [Deleted. Replaced by CAM condition]
4. The owner/operator shall ensure A-21 Baghouse No.5 outlet grain loading does not exceed 0.01 gr/dscf. (basis: cumulative increase; 40 CFR 63.7690(a)(5)(i))
5. [Deleted. Moved sand throughput limit to S-3 Sand Preparation]
6. Unless otherwise indicated in specific permit conditions, the owner/operator shall maintain the following records for S-2:
  - a. monthly throughput of iron poured
  - b. total material throughput for the preceding 12 months
  - c. (basis: Regulation 2-1-403)

## VI. Permit Conditions

7. The owner/operator shall perform District-approved source tests at least once every 5 years for VOC to demonstrate compliance with Regulation 8, Rule 2. The owner/operator shall obtain approval for all source test procedures from the District's Source Test Section prior to conducting any tests. The owner/operator shall comply with all applicable testing requirements as specified in Volume V of the District's Manual of Procedures. The owner/operator shall notify the District's Source Test Section in writing of the source test protocols and projected test dates at least 7 days prior to testing. All measurements, records, and data for each source test shall be retained by the owner/operator for at least five years and made available to the District upon request. (basis: Regulation 2-1-403)
8. The owner/operator shall ensure total iron cast in sand molds at this facility shall not exceed 36,000 tons in any consecutive 12-month period. (basis: cumulative increase)

### Condition #24639

For

- S-34 P5-P6 Pipe Finishing Dip Tank: 114 Gallon Capacity; abated by A-35 Fiber Bed Mist Collector
- S-35 P4 Pipe Finishing Dip Tank: 454 Gallon Capacity; abated by A-35 Fiber Bed Mist Collector
- S-36 P2-P3 Pipe Finishing Dip Tank: 333 Gallon Capacity; abated by A-35 Fiber Bed Mist Collector
- S-43 P1 Pipe Finishing Dip Tank: 182 Gallon Capacity

1. The owner/operator shall ensure the annual net coating usage at S-34, 35, S-36 and S-43 Pipe Finishing Dip Tanks does not exceed a combined total throughput of 251,442 gallons (1090 tons) over any consecutive twelve month period. (basis: Cumulative Increase, Offsets, Toxics)
2. The owner/operator shall ensure the annual net coating usage at S-43 P1 Pipe Finishing Dip Tank does not exceed 2,000 gallons over any consecutive twelve month period. (basis: Cumulative Increase)
3. The owner/operator shall use exclusively synthetic asphalt pipe coating (manufactured by Professional Coating Tech., Inc.) at S-34, 35, S-36 and S-43 Pipe Finishing Dip Tanks to ensure the VOC content of the asphalt does not exceed 0.04 lb/gal. (basis: Cumulative Increase)
4. The owner/operator shall ensure S-34, S-35 and S-36 are continuously abated by A-35 Fiber Bed Mist Collector during all periods of operation. (Basis: Cumulative Increase)
5. The owner/operator shall equip the A-35 Fiber Bed Mist Collector with a pressure gauge and operate and maintain the abatement device according to manufacturer's instructions. (Basis: Cumulative Increase)

## VI. Permit Conditions

6. The owner/operator shall ensure the operating temperature of each hot dip tank (S-34 or S-35 or S-36 or S-43) does not exceed 500oF. (Basis: Cumulative Increase, Toxics)
7. The owner/operator of S-34, S-35, S-36 and S-43 shall install and operate a temperature measuring and recording device to continually monitor and record the temperature of the heated asphalt bath at each source. This record shall be kept for a period of at least 5 years from date of entry. (Basis: Toxics, Cumulative Increase, monitoring)
8. The owner/operator shall not use any cleanup solvent at S-34, S-35, S-36 and S-43. (Basis: Cumulative Increase, Toxics)
9. In the event there is one District-confirmed odor complaint, the owner/operator shall submit an abatement plan to the District Engineering Division for S-43. If required, the owner/operator shall install a District-approved abatement device upon approval from the District. (Basis: Regulation 1-301)
10. In the event this operation causes a public nuisance under Regulation 1-301 due to odors, the owner/operator shall submit a comprehensive odor abatement plan to eliminate or sufficiently reduce odors to tolerable levels at the facility to the District's Engineering Division within 30 days of the public nuisance. The owner/operator shall obtain District approval of the odor abatement plan and comply with the District-approved odor abatement plan. The plan shall be modified and re-approved by the District as necessary to keep odors at tolerable levels at the facility. Tolerable odor levels shall be odor levels that do not result in a public nuisance. (Basis: Public Nuisance, Regulation 1-301)
11. The owner/operator of S-34, S-35, S-36 and S-43 shall maintain monthly records, in a District approved log, of the total net usage of asphalt coating (in gallons) used at all of these sources. In addition, the owner/operator shall maintain monthly records, in a District approved log, of the estimated net asphalt coating (in gallons) used at each source. Furthermore, the owner/operator shall maintain monthly records, in a District-approved log, of the following: a) the operating hours of S-34, S-35, S-36, and S-43, b) the operating hours of A-35 Fiber Bed Mist Collector, and c) the maintenance records for A-35 Fiber Bed Mist Collector. All records shall be retained for a period of at least five years from date of entry. This log shall be kept on site and made available to the District's staff upon request. (Basis: Recordkeeping)
12. [Deleted. Cutback asphalt dip tanks shut down on 7/21/2010, 12/16/2010, and 6/30/2010.]



## VI. Permit Conditions

### B. Facility-Wide Permit Conditions

#### Condition #25039

Compliance Assurance Monitoring (CAM) condition

Parts 1 through 13 apply to the following sources and abatement devices:

S-2 Pouring Cooling Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4

S-3 Sand Preparation abated by A-15 Baghouse #1

S-4 Wheelabrator Shot Blast (No.1) abated by A-17 Baghouse #3

S-5 Pangborn Shot Blast (No. 2) abated by A-17 Baghouse #3

S-27 Wheelabrator Shot Blast (No. 3) abated by A-17 Baghouse #3

S-30 Inline Shot Blast abated by A-17 Baghouse #3

S-49 Casting Grinding abated by A-14 Baghouse #2 (exempt source abated by the same abatement device as a regulated source subject to CAM)

1. The following definitions apply to the Compliance Assurance Monitoring plan for sources with associated abatement device mentioned above to assure compliance with Regulation 6:
  - a. The following is defined as an exceedance:
    - i. a visible emission detected using EPA Method 9 which is as dark or darker than No. 1 on the Ringelmann Chart, or of such opacity as to obscure an observer's view to an equivalent or greater degree for more than 3 minutes in any hour.
  - b. The following are defined as excursions:
    - i. any visible emissions detected using EPA Method 22-like observation;
    - ii. a pressure drop across a baghouse cell in inches of water column that is less than 2 inches or greater than 10 inches.  
(Basis: 40 CFR Part 64.6(c)(2))
2. The owner/operator shall perform at least one 6-minute EPA Method 22-like observation for qualitative visible emissions on the above sources and associated abatement devices at least once every week to ensure compliance with SIP Regulation 6-301. (basis: 40 CFR Part 64.6(c)(1); 40 CFR Part 64.6(c)(3))
3. The owner/operator shall equip the above abatement devices with differential pressure gauges that measure the pressure drop across each baghouse cell in inches of water column. The gauges shall have a minimum accuracy of 0.5 inches water column. (Basis: 40 CFR Part 64.6(c)(1))
4. The indicator range that assures no visible emissions from the above sources and their associated abatement devices shall be a pressure drop across a baghouse cell of 2 to 10 inches of water column. (40 CFR Part 64.3(a)(2))
5. The owner/operator shall take a reading of the differential pressure gauges at least once per day. The pressure readings shall be recorded in a District-approved log. (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))
6. The pressure gauges shall be visually inspected prior to use and the owner/operator shall ensure that the gauges are calibrated in accordance with AB&I's Operation and Maintenance Plan (non-NESHAP). (Basis: 40 CFR Part 64.3(b)(3) and (b)(2))

## VI. Permit Conditions

7. If an excursion occurs at any of the sources above, the owner/operator shall follow the corrective action plan contained in AB&I's Operation and Maintenance Plan (non-NESHAP). If excursions continue to occur, the District may require the owner/operator to develop and implement a Quality Improvement Plan (QIP). (Basis: 40 CFR Parts 64.6(c)(3), 64.7(d)(2), 64.8)
8. If 2 or more excursions at the same abatement device occur within two weeks, a certified observer shall perform a Method 9 observation on the associated abatement device within 48 hours of the second excursion. (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))
9. The owner/operator of the above sources and their associated abatement devices shall submit a monitoring report to the District in accordance with 40 CFR Part 70.6(a)(3)(iii) (every six months). The report shall include all of the following information:
  - a. Summary information on the number, duration, and cause of excursions or exceedances and the corrective actions taken;
  - b. Summary information on the number, duration, and cause for monitor downtime incidents.(Basis: 40 CFR Part 64.6(c)(3) and 40 CFR Part 64.9(a)(2))
10. The owner/operator shall inspect, operate and maintain each baghouse and monitoring device in accordance with AB&I's Operation and Maintenance Plan (non-NESHAP). (Basis: 40 CFR Part 64.6(c)(1)(iii))
11. The owner/operator shall perform source tests for the above sources and their associated abatement devices at least once every 5 years to demonstrate with compliance with PM limits and opacity limits. The owner/operator shall obtain approval for all source test procedures from the District's Source Test Section prior to conducting any tests. The owner/operator shall comply with all applicable testing requirements as specified in Volume V of the District's Manual of Procedures. The owner/operator shall notify the District's Source Test Section, in writing, of the source test protocols and projected test dates at least 7 days prior to testing, excluding Method 9 observations performed for Part 8 above. (Basis: Regulation 2-1-403)
12. The owner/operator shall keep the records, including dates and time, of the pressure drop measurements, visible emission observations, calibrations, inspections, maintenance, monitor downtime incidents, test results, excursions, exceedances, and corrective action taken for at least 5 years and shall make the records available to District staff upon request. (Basis: Regulation 2-6-501 Recordkeeping)
13. The owner/operator shall submit AB&I's Operation and Maintenance Plan (non-NESHAP) to the District's Engineering Division and Compliance and Enforcement Division for review and approval within 30 days of issuance of the Title V permit renewal in 2012. AB&I's Operation and Maintenance Plan (non-NESHAP) shall include a monitoring plan, a corrective action plan, a list of frequently needed spare parts that shall be kept onsite, details, procedures, and frequency of inspections, preventative maintenance, and recordkeeping, and documentation templates. Any changes to AB&I's Operation and Maintenance Plan (non-NESHAP) must be submitted to the District's Engineering Division and Compliance and Enforcement Division for review and approval 21 days prior to being implemented. If the District does not provide a response within 21 days, the facility may implement the plan. (Basis: 40 CFR Part 64.6(c)(1)(iii))

## VI. Permit Conditions

Parts 14 through 28 apply to the following sources and abatement devices equipped with bag leak detectors:

S-1 Cupola abated by A-20 and A-22 Afterburners and A-19 Baghouse

S-2 Pouring Cooling Shakeout abated by A-21 Baghouse #5

14. The following definitions apply to the Compliance Assurance Monitoring plan for sources with associated abatement devices mentioned above to assure compliance with Regulation 6:
  - a. The following is defined as an exceedance:
    - i. a visible emission detected using EPA Method 9 which is as dark or darker than No. 1 on the Ringelmann Chart, or of such opacity as to obscure an observer's view to an equivalent or greater degree for more than 3 minutes in any hour.
  - b. The following are defined as excursions:
    - i. Detection by the bag leak detector of particulate matter emissions at concentrations of greater than 10 milligrams per actual cubic meter for 15 minutes or longer;
    - ii. a pressure drop across a baghouse cell in inches of water column that is less than 2 inches or greater than 10 inches.  
(Basis: 40 CFR Part 64.6(c)(2))
15. The owner/operator shall equip each of the above abatement devices with a bag leak detector that complies with 40 CFR Part 63, Subpart EEEEE (NESHAPs for Iron and Steel Foundries) (Basis: 40 CFR Part 64.6(c)(1); 40 CFR Part 64.6(c)(3))
16. The owner/operator shall equip A-19 and A-21 bag leak detection systems with an alarm system. Following an alarm, owner/operator shall follow the corrective action procedures in AB&I's Operation and Maintenance Plan (NESHAP), developed and maintained in accordance with 40 CFR Part 63, Subpart EEEEE. (Basis: 40 CFR Part 64.6(c)(1))
17. The concentration of particulate matter emissions that assures no visible emissions from A-19 and A-21 shall be less than 10 milligrams per actual cubic meter. (Basis: 40 CFR Part 64.3(a)(2))
18. The owner/operator shall visually inspect and test the bag leak detection sensors in accordance with AB&I's Operation and Maintenance Plan (NESHAP), developed and maintained in accordance with 40 CFR Part 63, Subpart EEEEE. (Basis: 40 CFR Part 64.3(b)(3) and (b)(2))
19. The owner/operator shall equip the above abatement devices with differential pressure gauges that measure the pressure drop across each baghouse cell in inches of water column. The gauges shall have a minimum accuracy of 0.5 inches water column. (Basis: 40 CFR Part 64.6(c)(1))
20. The indicator range that assures no visible emissions from the above sources and their associated abatement devices shall be a pressure drop across a baghouse cell of 2 to 10 inches of water column. (40 CFR Part 64.3(a)(2))
21. The owner/operator shall take a reading of the pressure gauges at least once per day. The pressure readings shall be recorded in a District-approved log. (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))

## VI. Permit Conditions

22. The pressure gauges shall be visually inspected prior to use and the owner/operator shall ensure that the gauges are calibrated in accordance with AB&I's Operation and Maintenance Plan (NESHAP), developed and maintained in accordance with 40 CFR Part 63, Subpart EEEEE. (Basis: 40 CFR Part 64.3(b)(3) and (b)(2))
23. If an excursion occurs at any of the sources above, the owner/operator shall follow the corrective action plan contained in AB&I's Operation and Maintenance Plan (NESHAP), developed and maintained in accordance with 40 CFR Part 63, Subpart EEEEE. If excursions continue to occur, the District may require the owner/operator to develop and implement a Quality Improvement Plan (QIP). (Basis: 40 CFR Parts 64.6(c)(3), 64.7(d)(2), 64.8)
24. If 2 or more excursions at the same abatement device occur within two weeks, a certified observer shall conduct a Method 9 on the associated abatement device within 48 hours of the second excursion. (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))
25. The owner/operator of the above sources and their associated abatement devices shall submit a monitoring report to the District in accordance with 40 CFR Part 70.6(a)(3)(iii) (every six months). The report shall include all of the following information:
  - a. Summary information on the number, duration, and cause of excursions or exceedances and the corrective actions taken;
  - b. Summary information on the number, duration, and cause for monitor downtime incidents.(Basis: 40 CFR Part 64.6(c)(3) and 40 CFR Part 64.9(a)(2))
26. The owner/operator shall inspect each baghouse and monitoring system in accordance with AB&I's Operation and Maintenance Plan (NESHAP), developed and maintained in accordance with 40 CFR Part 63, Subpart EEEEE. (Basis: 40 CFR Part 64.6(c)(1)(iii))
27. The owner/operator shall perform source tests for the above sources and their associated abatement devices at least once every 5 years to demonstrate with compliance with PM limits and opacity limits. The owner/operator shall obtain approval for all source test procedures from the District's Source Test Section prior to conducting any tests. The owner/operator shall comply with all applicable testing requirements as specified in Volume V of the District's Manual of Procedures. The owner/operator shall notify the District's Source Test Section, in writing, of the source test protocols and projected test dates at least 7 days prior to testing, excluding the Method 9 observations taken per Part 24 above. (Basis: Regulation 2-1-403)
28. The owner/operator shall keep the records, including dates and time, of the pressure drop measurements, visible emission observations, calibrations, inspections, maintenance, monitor downtime incidents, test results, excursions, exceedances, and corrective action taken for at least 5 years and shall make the records available to District staff upon request. (Basis: Regulation 2-6-501 Recordkeeping)

## VII. APPLICABLE LIMITS AND COMPLIANCE MONITORING REQUIREMENTS

This section has been combined in Section IV above.

## 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 the Applicable Emission Limits & Compliance Monitoring Requirements of Section IV, , of this permit.

**Table VIII**

<b>Applicable Requirement</b>	<b>Description of Requirement</b>	<b>Acceptable Test Methods</b>
BAAQMD 6-1-301	Ringelmann No. 1 Limitation	Manual of Procedures, Volume I, Evaluation of Visible Emissions
BAAQMD 6-1-310	Particulate Weight Limitation	Manual of Procedures, Volume IV, ST-15, Particulates Sampling
BAAQMD 6-1-311	General Operations	Manual of Procedures, Volume IV, ST-15, Particulates Sampling
BAAQMD 8-2-301	Miscellaneous Operations	Manual of Procedures, Volume IV, ST-7 Non-Methane Organic Carbon Sampling, or EPA Method 25 or 25A
BAAQMD 8-4-302	Solvents and Surface Coating Requirements	Manual of Procedures, Volume III, Method 21 or 22, Volatile Organic Compounds
BAAQMD 8-4-312	Solvent Evaporation Loss Minimization	Manual of Procedures, Volume III, Method 31, Volatile Organic Compounds
BAAQMD 8-5-301	True Vapor Pressure	Manual of Procedures, Volume III, Lab Method 28. True Vapor Pressure
BAAQMD 8-19-302	Analysis of Coating Samples:	Manual of Procedures, Volume III, Method 21 or 22
BAAQMD 9-1-302	General Emission Limitation	Manual of Procedures, Volume IV, ST-19A, Sulfur Dioxide, Continuous Sampling, or ST-19B, Total Sulfur Oxides Integrated Sample
BAAQMD 11-1-301	Daily Limitation, Lead	Manual of Procedures, Volume IV, ST-9, Lead

## **IX. PERMIT SHIELD**

This facility has no permit shields.

## **X. GLOSSARY**

### **BAAQMD**

Bay Area Air Quality Management District

### **BACT**

Best Available Control Technology

### **Basis**

The underlying authority that 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

### **CPMS**

Continuous Parameter Monitoring System

### **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.

## **X. Glossary**

### **Federally Enforceable, FE**

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.

### **FP**

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

### **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 both 40 CFR Part 63, and District Regulation 2, Rule 5.

### **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. Contained in 40 CFR Part 61.

### **NMHC**

Non-methane Hydrocarbons

### **NO<sub>x</sub>**

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.



## **X. Glossary**

### **NSR**

New Source Review. A federal program for preconstruction review and permitting of new and modified sources of air pollutants for which the District is classified "non-attainment". 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.)

### **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 and any pre-existing cumulative increase minus any onsite contemporaneous emission reduction credits. Applies to emissions of POC, NO<sub>x</sub>, PM10, and SO<sub>2</sub>.

### **Phase II Acid Rain Facility**

A facility that generates electricity for sale through fossil-fuel combustion and by virtue of certain other characteristics (defined in Regulation 2, Rule 6) is subject to Titles IV and V of the Clean Air Act.

### **POC**

Precursor Organic Compounds

### **PM**

Total 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.

### **Sand Muller**

A machine for mixing sand, clay binders, and water by a kneading and squeezing action for use in sand molds.

### **SIP**

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

### **SO<sub>2</sub>**

Sulfur dioxide

## **X. Glossary**

### **Title V**

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

### **TSP**

Total Suspended Particulate

### **VOC**

Volatile Organic Compounds

### **VOHAP**

Volatile Organic Hazardous Air Pollutants

### **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 <sup>2</sup>	=	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

## **XI. REVISION HISTORY**

Title V Permit Initial Issuance (Application #25865) March 5, 2002

Title V Permit Renewal (Application #15105) April 13, 2011

The following applications are included in Title V Permit renewal (Application #15105)

- NSR # 25551 (previously omitted from initial Title V permit)
- NSR #4778
- NSR #8326
- NSR #13813
- TV#14437/NSR #14438
- NSR #14757
- NSR #15373
- NSR #15807
- TV #16220/NSR #16139
- NSR #16365
- NSR #17123
- NSR #18833
- NSR #21488
- NSR #21603