Foundry/Corporate Office

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March 28, 2019

Director of Compliance & Enforcement
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105
Attn: Title V Reports

Director of the Air Division
USEPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105
Attention: Air-3

Re: **Combined Semi-Annual Compliance Report**

1. Title V Semi-Annual Report and Monitoring Verification Report
2. MACT EEEEE Semi-Annual Report
3. MACT MMMM Semi-Annual Report

AB&I Foundry, Oakland, CA
BAAQMD Facility #A0062

AB&I Foundry (Facility #A0062) located in Oakland, California submits the following Semi-Annual Compliance Report for the September 1, 2018 through February 28, 2019 reporting period. This submittal combines three semi-annual reports and includes information as required by the facility's Title V Permit, 40 Code of Federal Regulation (CFR) Part 63, Subpart EEEEE, National Emission Standard for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries, and 40 CFR Part 63, Subpart MMMM, NESHAP for Surface Coating of Miscellaneous Metal Parts and Products.

In this report, AB&I has included four deviations regarding the 3-hour average draft differential pressure for A-19 Cupola which were identified and reported to the BAAQMD but are still being investigated. AB&I has been working closely with our consultant Novate Solutions, who believe the deviations may all be related to a specific data collection software processing configuration. AB&I and Novate are working expeditiously on analysis of this matter and upon completion, AB&I will submit an amended report to include all results of the investigation.

If you have any questions, please do not hesitate to contact me at (510) 632-3467 or Michael.lowe@abifoundry.com.

Sincerely,

Michael Lowe
General Manager
AB&I Foundry

AB&I Foundry

Semi-Annual Compliance Report

September 1, 2018 – February 28, 2019

Oakland, California

March 28, 2019

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SECTION 1
INTRODUCTION

AB&I Foundry (AB&I) operates an iron foundry in Oakland, California for the production of cast iron in the manufacturing of drain-waste-vent (DWV) pipe and fittings. AB&I (Facility #A0062) is preparing this Semi-Annual Compliance Report (SAR) for the Bay Area Air Quality Management District (BAAQMD) and the United States Environmental Protection Agency (USEPA), Region 9 in accordance with AB&I's Title V Permit and 40 Code of Federal Regulation (CFR) Part 70. Standard Condition I.F. requires the facility to submit reports of all required monitoring to the District at least once every six months. The reporting period for this Semi-Annual Report is September 1, 2018 through February 28, 2019.

AB&I is subject to 40 CFR, Part 63, National Emission Standards of Hazardous Air Pollutants (NESHAP), Subpart EEEEE, which regulates emissions of volatile organic hazardous air pollutants (VOHAP) and particulate matter (PM) or total metal hazardous air pollutants (HAP) from foundry operations. Subpart EEEEE requires the facility to prepare a semi-annual compliance report in accordance with §63.7751.

AB&I is also subject to 40 CFR Part 63, NESHAP, Subpart MMMM for Surface Coating of Miscellaneous Metal Parts and Products. Subpart MMMM requires the facility to prepare a semi-annual compliance report in accordance with §63.3920.

Section 2 of this document includes the Title V SAR, Section 3 includes the required information for the Subpart EEEEE SAR, and Section 4 details the requirements for the Subpart MMMM SAR.

Statement by Responsible Official: NESHAPS (§63.10(d)(5)(i)) / Subpart EEEEE (§63.7751(b)(2)) / Subpart MMMM [§63.3910(c)(2)] / Section I.F. of the Title V Permit

As the Responsible Official, I certify that the information in this report is true, accurate, and complete.

Name: Michael Lowe

Title: General Manager, AB&I Foundry

Signature: _____

Date: 3/28/19

SECTION 2
TITLE V SEMI-ANNUAL REPORT

Section I.F. of the Title V Permit requires the facility to submit semi-annual reports. All instances of non-compliance shall be clearly identified in these reports. Any deviations that occurred during the September 1, 2018 through February 28, 2019 reporting period is included in the table below.

In this report, AB&I has included four deviations regarding the 3-hour average draft differential pressure for A-19 Cupola which were identified and reported to the BAAQMD but are still being investigated. AB&I has been working closely with our consultant Novate Solutions, who believe the deviations may all be related to a specific data collection software processing configuration. AB&I and Novate are working expeditiously on analysis of this matter and upon completion, AB&I will submit an amended report to include all results of the investigation. AB&I also had an incident of loss of data, from January 2, 2019 to January 17, 2019; a period which included 8 days of production. This issue is also still under investigation and will also be addressed in the amended report.

The Startup, Shutdown, Malfunction Plan was revised in September of 2017. Changes were mostly administrative with only minor implications. Those revisions have been logged in a revision report which is available upon request.

The Operations and Maintenance Plan has been updated to better reflect the requirements in 63.7745(a)(5). Previously the plan stated that mold ignitability would be demonstrated whenever molds were changed; this was not being done, but it is not required by the regulation.

This report is certified by the Responsible Official as true, accurate and complete in Section 1.

2.1 Title V Monitoring Report Deviations

Source	Permit ID	Description	Deviation Period		Cause of Deviation	Corrective Actions Taken to Remedy or Mitigate Deviation Situation
			Start Date/Time	End Date/Time		
S-34 S-35 S-36	BAAQMD Condition #24639, Item 4	Pipe Finishing Dip Tanks are continuously abated by Mist Eliminators A-35 and A-36	09/18/18 4:00 AM	09/18/18 4:30 AM	Variable Frequency Drive (VFD) failed on A-36; pipe had already been poured before malfunction was discovered	AB&I submitted an RCA report to the BAAQMD on September 20, 2018. Pipe Finishing Dip Tanks were interlocked with Mist Eliminators A-35 and A-36 to disallow operation of dip tanks with mist eliminators operational
S-1 Cupola	EEEEE 63.7690(b)(1)(ii) & MACT OMP 2.2(ii)	During normal process operation, the draft pressure should be greater than or equal to 0.2 inches of water column on a 3-hour average.	01/02/2019 07:12 AM	01/02/2019 8:50 AM	The 3 hours average differential pressure for A-19 Cupola may have been under 0.2, the incident is still under investigation but is still unclear at this point.	AB&I submitted an RCA report to the BAAQMD on January 4, 2019. The details of this incident are still under investigation, further information will be provided as soon as it is available.
S-1 Cupola	EEEEE 63.7690(b)(1)(ii) & MACT OMP 2.2(ii)	During normal process operation, the draft pressure should be greater than or equal to 0.2 inches of water column on a 3-hour average.	01/17/2019 8:30 AM	01/17/2019 8:45 AM	The 3 hours average differential pressure for A-19 Cupola may have been under 0.2, the incident is still under investigation but is still unclear at this point.	AB&I submitted an RCA report to the BAAQMD on January 18, 2019. The details of this incident are still under investigation, further information will be provided as soon as it is available.

Source	Permit ID	Description	Deviation Period		Cause of Deviation	Corrective Actions Taken to Remedy or Mitigate Deviation Situation
			Start Date/Time	End Date/Time		
S-1 Cupola	EEEEE 63.7690(b)(1)(ii) & MACT OMP 2.2(ii)	During normal process operation, the draft pressure should be greater than or equal to 0.2 inches of water column on a 3-hour average.	01/21/2019 9:58 AM	01/21/2019 10:57 AM	The 3 hours average differential pressure for A-19 Cupola may have been under 0.2, the incident is still under investigation but is still unclear at this point.	AB&I submitted an RCA report to the BAAQMD on March 21, 2019. This deviation was discovered after review of data for Title V reporting. The details of this incident are still under investigation, further information will be provided as soon as it is available.
S-1 Cupola	EEEEE 63.7690(b)(1)(ii) & MACT OMP 2.2(ii)	During normal process operation, the draft pressure should be greater than or equal to 0.2 inches of water column on a 3-hour average.	01/31/2019 8:00 AM	01/31/2019 8:30 AM	The 3 hours average differential pressure for A-19 Cupola may have been under 0.2, the incident is still under investigation but is still unclear at this point.	The details of this incident are still under investigation, further information will be provided as soon as it is available.

The Semi-Annual Monitoring Verification Report is included as Attachment 2-1.

Attachment 2-1
Semi-Annual Monitoring Verification Report

Semi-Annual Monitoring Verification Report
Reporting Period: September 1, 2018 through February 28, 2019
AB&I Foundry

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements Facility (Except S-51)						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
NESHAP 40 CFR Part 63, Subpart EEEEE	**National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries (02/07/2008)**					
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
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
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(b)	Initial demonstration of compliance with work practice standards and operation and maintenance requirements within 30 days of April 22, 2005					Y
63.7731(b)	Subsequent performance tests for fugitive emissions from building or structures	Opacity level ≤ 20% (6 minute average) 63.7690(a)(7)	63.7731(b)	Visible Emissions (M9) P/6 months	Once every six months	Y
63.7735	Initial compliance demonstration with work practice standards					Y
63.7736	Initial compliance demonstration with operation and maintenance requirements					Y
63.7743(a)(7)	Continuous compliance demonstration for fugitive emissions from building or structures	Opacity level ≤ 20% (6 minute average) 63.7690(a)(7)	63.7731(b)	Visible Emissions (M9) P/6 months	Once every six months	Y
63.7745(a)(1)	Continuous compliance demonstration – operation and maintenance requirements			Inspections, corrective action, record keeping P/M	Once every six months	Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements Facility (Except S-51)						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
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

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**	**Compliance (Y / N)**
BAAQMD Regulation 6, Rule 1	**Particulate Matter (12/05/07)**					
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
			CAM Condition #25039, Part 21	Pressure drop monitoring P/D	Once every six months	Y
			BAAQMD Condition #9351, Part 11; CAM Condition #25039, Part 27	Source Test P/Every 5 years	Every 5 years	Y
6-1-305	Visible Particles					Y
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
			CAM Condition #25039, Part 21	Pressure drop monitoring P/D	Once every six months	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
6-1-311	General Operations	FILTERABLE PARTICULATE $4.10P^{0.67}$ 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
			CAM Condition #25039, Part 21	Pressure drop monitoring P/D	Once every six months	Y

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**	**Compliance (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
6-1-401	Appearance of Emissions					Y
6-1-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions					Y
SIP Regulation 6	**Particulate Matter and Visible Emissions (09/04/98)**					
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
			CAM Condition #25039, Part 21	Pressure drop monitoring P/D	Once every six months	Y
			BAAQMD Condition #9351, Part 11; CAM Condition #25039, Part 27	Source Test P/Every 5 years	Every 5 years	Y
6-305	Visible Particles					Y
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
			CAM Condition #25039, Part 21	Pressure drop monitoring P/D	Once every six months	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

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**	**Compliance (Y / N)**
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
			CAM Condition #25039, Part 21	Pressure drop monitoring P/D	Once every six months	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
6-401	Appearance of Emissions					Y
6-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions					Y
BAAQMD Regulation 8, Rule 2	**Organic Compounds: Miscellaneous Operations (7/20/2005)**					
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
8-2-601	Determination of Compliance					Y
BAAQMD Regulation 9, Rule 1	**Inorganic Gaseous Pollutants: Sulfur Dioxide (3/15/1995)**					
9-1-304	Fuel Burning (Liquid and Solid Fuels)	Sulfur content of solid fuel limited to ensure $SO2 \leq 300$ ppmd	BAAQMD Condition #9351, Part 4	Fuel certification; Source test if >1.0% S P/E	Once every six months	Y
			BAAQMD Condition #9351, Part 11	Source Test P/Every 5 years	Every 5 years	Y
9-1-601	Sampling and Analysis of Gas Streams					Y
9-1-602	Sulfur Content of Fuels					Y

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**	**Compliance (Y / N)**
9-1-603	Averaging Times					Y
BAAQMD Regulation 11, Rule 1	**Hazardous Pollutants/ Lead (3/17/82)**					
11-1-301	Daily Limitation	LEAD 15 lb/day	BAAQMD Condition #9351, Part 11	Source Test P/Every 5 years	Every 5 years	Y
11-1-302	Ground Level Concentration Limit Without Background	LEAD $\leq$1.0 ug/m^3		N		Y
11-1-604	Determination of Daily Emission Limits					Y
NESHAP 40 CFR Part 63, Subpart EEEEE	**National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries (02/07/2008)**					
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
63.7690(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
			63.7740 (b)	Baghouse inspection P/varies		Y
			63.7731(a); 63.7743(a)(12)	Source Test P/Every 5 years		Y
63.7690(a)(8)	Emissions Limitations for cupola at existing iron and steel foundry	VOHAP $\leq$ 20 ppmv @ 10% O2	63.7740(a)	Temperature monitor C	Once every six months	Y
			63.7731(a); 63.7743(a)(12)	Source Test P/Every 5 years	Every 5 years	Y

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**	**Compliance (Y / N)**
63.7690(b)(1)	Install, operate, and maintain a capture and collection system for VOHAP					N – Refer to Title V Monitoring Deviation Report included in Section 2 of the Combined Semi-Annual Report
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
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
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
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)(2); and VOHAP: 63.7690(a)(8)	40 CFR Part 63.7(a)(2)	Initial performance test P/E	Initial	Y

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**	**Compliance (Y / N)**
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
63.7731(b)	Subsequent performance tests for fugitive emissions from building or structures	Opacity level ≤ 20% (6 minute average) 63.7690(a)(7)	63.7731(b)	Visible Emissions (M9) P/6 months	Once every six months	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
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
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
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
63.7740(c)(4)	Monitoring requirements – Baghouse inspection requirements	Monitor cleaning cycles	63.7740(c)(4)	Inspection P/A	Once every six months	Y

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**	**Compliance (Y / N)**
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
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
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
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
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
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
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
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)					N – Data Loss occurred for a period of eight production days, between January 2, 2019 and January 17, 2019.
63.7743(a)(2)	Continuous compliance demonstration for existing cupola	Maintaining the average limits: 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

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**	**Compliance (Y / N)**
			63.7740 (c)	Baghouse inspection P/varies		Y
			63.7743(a)(12)	Source Test P/Every 5 years		Y
63.7743(a)(7)	Continuous compliance demonstration for fugitive emissions from building or structures	Opacity level ≤ 20% (6 minute average) 63.7690(a)(7)	63.7731(b)	Visible Emissions (M9) P/6 months	Once every six months	Y
63.7743(a)(8)	Continuous compliance demonstration for existing cupola	Maintaining the average limits: VOHAP ≤ 20 ppmv @ 10% O2	63.7740(a)	Temperature monitor C	Once every six months	Y
			63.7743(a)(12)	Source Test P/Every 5 years	Every 5 years	Y
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
63.7743(b)	Continuous compliance demonstration – capture system	0.2 inches of water column vacuum (O&M Plan)		Static pressure monitor for flow detection C	Once every six months	N – Refer to Title V Monitoring Deviation Report included in Section 2 of the Combined Semi-Annual Report
63.7743(c)	Continuous compliance demonstration - baghouse			Inspections P/varies	Once every six months	Y
63.7743(e)	Continuous compliance demonstration – combustion device			Temperature monitor C	Once every six months	N – Data Loss occurred for a period of eight production days, between January 2, 2019 and January 17, 2019.
63.7745(a)(1)	Continuous compliance demonstration – operation and maintenance requirements			Inspections, corrective action, record keeping P/M	Once every six months	Y

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**	**Compliance (Y / N)**
63.7745(a)(2)	Continuous compliance demonstration – Preventative maintenance			Record keeping P/E	Once every six months	Y
63.7745(a)(3)	Continuous compliance demonstration – bag leak detection system			Record keeping P/E	Once every six months	Y
63.7745(a)(4)	Continuous compliance demonstration – baghouse corrective action			Record keeping P/E	Once every six months	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
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					N – Data Loss occurred for a period of eight production days, between January 2, 2019 and January 17, 2019.
63.7753	Recordkeeping requirements (5 years)					N – Data Loss occurred for a period of eight production days, between January 2, 2019 and January 17, 2019.
63.7760	Table 1: Applicability of General Provisions (Subpart A)					Y
63.7761	Delegation					Y
63.7765	Definitions					Y

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**	**Compliance (Y / N)**
BAAQMD Condition #9351						
Part 1	Minimum A-20, A-22 Afterburners combustion zone Temperature (basis: 40 CFR 63.7690 (b)(3))	Afterburner combustion zone temperature ≥ 1300°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
Part 2	Continuous temperature monitor and recorder requirement (basis: cumulative increase, Regulation 1-521)					N – Data Loss occurred for a period of eight production days, between January 2, 2019 and January 17, 2019.
Part 3	Record keeping requirement - temperature (basis: cumulative increase, BAAQMD Regulation 2-6-501)					N – Data Loss occurred for a period of eight production days, between January 2, 2019 and January 17, 2019.
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
Part 5	Ratio of total metal to total coke charged into S-1 limit	Total Metal (includes scrap iron, steel, returns, and pig iron) to Coke ≥ 10:1	BAAQMD Condition # 9351, Part 8	Record Keeping P/D	Daily, Monthly, Annual Average	Y
Part 6	Daily total metal throughput limit	Total Metal ≤ 513 tons/day	BAAQMD Condition # 9351, Part 8	Record Keeping P/D	Daily, Monthly, Annual Average	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
Part 8	Record keeping requirement - Gray iron throughput (basis: Regulation 2-1-403					Y

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**	**Compliance (Y / N)**
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
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
Part ll	Source test for PM, opacity, CO, VOC, SO2, NOx, lead every 5 years					Y
CAM Condition #25039						
Part 14a	Definition of exceedance: OPACITY Ringelmann 1.0 < 3 min/hr(Basis: 40 CFR Part 64.6(c)(2))					Y
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
Part 21	Pressure gauge reading - Daily (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))					Y

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**	**Compliance (Y / N)**
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
Part 28	Recordkeeping requirements (Basis: Regulation 2-6-501 Recordkeeping)					N – Data Loss occurred for a period of eight production days, between January 2, 2019 and January 17, 2019.

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
BAAQMD Regulation 6, Rule 1	**Particulate Matter (12/05/07)**					
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
			CAM Condition #25039 Part 21 (A-21)	Pressure drop monitoring P/D	Once every six months	Y
			CAM Condition #25039 Part 2 (A-14, A-18)	Visible Emissions (M22) P/W	Once every six months	Y
			CAM Condition #25039 Part 5 (A-14, A-18)	Pressure drop monitoring P/D	Once every six months	Y
			CAM Condition #25039, Part 11 (A-14, A-18) and Part 27 (A-21)	Source Test P/Every 5 years	Every 5 years	Y
6-1-305	Visible Particles					Y
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
			CAM Condition #25039 Part 21 (A-21)	Pressure drop monitoring P/D	Once every six months	Y
			CAM Condition #25039 Part 2 (A-14, A-18)	Visible Emissions (M22) P/W	Once every six months	Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
			CAM Condition #25039 Part 5 (A-14, A-18)	Pressure drop monitoring P/D	Once every six months	Y
			CAM Condition #25039, Part 11 (A-14, A-18) and Part 27 (A-21)	Source Test P/every 5 years	Every 5 years	Y
6-1-311	General Operations	FILTERABLE PARTICULATE $4.10P^{0.67}$ 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
			CAM Condition #25039 Part 21 (A-21)	Pressure drop monitoring P/D	Once every six months	Y
			CAM Condition #25039 Part 2 (A-14, A-18)	Visible Emissions (M22) P/W	Once every six months	Y
			CAM Condition #25039 Part 5 (A-14, A-18)	Pressure drop monitoring P/D	Once every six months	Y
			CAM Condition #25039, Part 11 (A-14, A-18) and Part 27 (A-21)	Source Test P/every 5 years	Every 5 years	Y
6-1-401	Appearance of Emissions					Y
6-1-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions					Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
SIP Regulation 6	**Particulate Matter and Visible Emissions (09/04/98)**					
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
			CAM Condition #25039, Part 21 (A-21)	Pressure drop monitoring P/D	Once every six months	Y
			CAM Condition #25039, Part 2, (A-14, A-18)	Visible Emissions (M22) P/W	Once every six months	Y
			CAM Condition #25039 Part 5 (A-14, A-18)	Pressure drop monitoring P/D	Once every six months	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
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
			CAM Condition #25039, Part 21 (A-21)	Pressure drop monitoring P/D	Once every six months	Y
			CAM Condition #25039 Part 2 (A-14, A-18)	Visible Emissions (M22) P/W	Once every six months	Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
			CAM Condition #25039 Part 5 (A-14, A-18)	Pressure drop monitoring P/D	Once every six months	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
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
			CAM Condition #25039 Part 21 (A-21)	Pressure drop monitoring P/D	Once every six months	Y
			CAM Condition #25039 Part 2 (A-14, A-18)	Visible Emissions (M22) P/W	Once every six months	Y
			CAM Condition #25039 Part 5 (A-14, A-18)	Pressure drop monitoring P/D	Once every six months	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
6-401	Appearance of Emissions					Y
6-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions					Y
BAAQMD Regulation 8, Rule 2	**Organic Compounds: Miscellaneous Operations (7/20/2005)**					

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
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
8-2-601	Determination of Compliance					Y
NESHAP 40 CFR Part 63, Subpart EEEEE	**National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries (02/07/2008)**					
63.7681	Am I subject to this subpart?					Y
63.7682	What parts of my 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
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
			63.7740(b)	Baghouse inspection P/varies		Y
			63.7731(a); 63.7743(a)(12)	Source Test P/Every 5 years		Y
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
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

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
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
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
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
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
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
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

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
63.7740(c)(4)	Monitoring requirements – Baghouse inspection requirements	Monitor cleaning cycles	63.7740(c)(4)	Inspection P/A	Once every six months	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
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
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
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
			63.7740 (c)	Baghouse inspection P/varies		Y
			63.7731(a); 63.7743(a)(12)	Source Test P/Every 5 years		Y
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
63.7743(c)	Continuous compliance demonstration - baghouse			Inspections P/varies	Once every six months	Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
63.7745(a)(1)	Continuous compliance demonstration – operation and maintenance requirements			Inspections, corrective action, record keeping P/M	Once every six months	Y
63.7745	Igniting gases from mold vents		63.7710(b)(6)	P/E		N - The O&M plan has been updated to better reflect the requirements in 63.7745(a)(5). See Section 2 of this report.
63.7745(a)(2)	Continuous compliance demonstration – Preventative maintenance			Record keeping P/E	Once every six months	Y
63.7745(a)(3)	Continuous compliance demonstration – bag leak detection system			Record keeping P/E	Once every six months	Y
63.7745(a)(4)	Continuous compliance demonstration – baghouse corrective action			Record keeping P/E	Once every six months	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
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

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
63.7760	Table 1: Applicability of General Provisions (Subpart A)					Y
63.7761	Delegation					Y
63.7765	Definitions					Y
BAAQMD Condition #23650						
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
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
CAM Condition #25039						
For A-14 and A-18						
Part 1	Definition of exceedance: OPACITY Ringelmann 1.0 < 3 min/hr (Basis: 40 CFR Part 64.6(c)(2))					Y
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

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
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
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
For A-21						
Part 14a	Definition of exceedance: OPACITY Ringelmann 1.0 < 3 min/hr(Basis: 40 CFR Part 64.6(c)(2))					Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
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
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

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-18 Baghouse #4 and A-21 Baghouse #5						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
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
Part 28	Recordkeeping requirements (Basis: Regulation 2-6-501 Recordkeeping)					Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-3 –Sand Preparation abated by A-15 Baghouse #1						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
BAAQMD Regulation 6, Rule 1	**Particulate Matter (12/05/07)**					
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
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	Y
6-1-305	Visible Particles					Y
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
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y
			CAM Condition #25039, Part 11	Source Test P/every 5 years	Every 5 years	Y
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
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	Y
6-1-401	Appearance of Emissions					Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-3 –Sand Preparation abated by A-15 Baghouse #1						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
6-1-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions					Y
SIP Regulation 6	**Particulate Matter and Visible Emissions (09/04/98)**					
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
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	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
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	Y
6-311	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
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-3 –Sand Preparation abated by A-15 Baghouse #1						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	Y
6-401	Appearance of Emissions					Y
6-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions					Y
BAAQMD Condition #2237						
Part 2	Abatement requirement with A-15 Baghouse #1 (Basis: Cumulative Increase)					Y
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
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	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
Part 10	Record keeping requirements (Basis: Regulation 2-1-403)					Y
CAM Condition #25039						
Part 1	Definition of exceedance: OPACITY Ringelmann 1.0 < 3 min/hr (Basis: 40 CFR Part 64.6(c)(2))					Y
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

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-3 –Sand Preparation abated by A-15 Baghouse #1						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
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
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

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements 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						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
BAAQMD Regulation 6, Rule 1	**Particulate Matter (12/05/07)**					
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
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	Y
6-1-305	Visible Particles					Y
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
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	Y
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
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements 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						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
6-1-401	Appearance of Emissions					Y
6-1-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions					Y
SIP Regulation 6	**Particulate Matter and Visible Emissions (09/04/98)**					
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
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	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
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	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
			CAM Condition #25039 Part 5	Pressure drop monitoring P/D	Once every six months	Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements 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						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
			CAM Condition #25039, Part 11	Source Test P/Every 5 years	Every 5 years	Y
6-401	Appearance of Emissions					Y
6-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions					Y
BAAQMD Condition #10139						
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
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
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
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
Part 8	Record keeping requirements (Basis: Regulation 2-1-403)					Y
BAAQMD Condition #13298						
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
Part 2	Abatement requirement with A-17 Baghouse #3 (Basis: Cumulative Increase)					Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements 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						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
Part 3	Record keeping requirements (Basis: Regulation 2-1-403)					Y
CAM Condition #25039						
Part 1	Definition of exceedance: OPACITY Ringelmann 1.0 < 3 min/hr (Basis: 40 CFR Part 64.6(c)(2))					Y
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

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements 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						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
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

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-25 Holding Furnace abated by A-25 Fume Baghouse						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
BAAQMD Regulation 6, Rule 1	**Particulate Matter (12/05/07)**					
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
			BAAQMD Condition #9668, Part 8	Source Test P/Every 5 years	Every 5 years	Y
			BAAQMD Condition #9668, Part 5	Record keeping of preventative maintenance P/W	Once every six months	Y
6-1-305	Visible Particles					Y
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
			BAAQMD Condition #9668, Part 8	Source Test P/Every 5 years	Every 5 years	Y
			BAAQMD Condition #9668, Part 5	Record keeping of preventative maintenance P/W	Once every six months	Y
6-1-311	General Operations	FILTERABLE PARTICULATE $4.10P^{0.67}$ lb/hr where P is process weight, ton/hr	BAAQMD Condition #9668, Part 3	Bag leak detector C	Once every six months	Y
			BAAQMD Condition #9668, Part 8	Source Test P/Every 5 years	Every 5 years	Y
			BAAQMD Condition #9668, Part 5	Record keeping of preventative maintenance P/W	Once every six months	Y
6-1-401	Appearance of Emissions					Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-25 Holding Furnace abated by A-25 Fume Baghouse						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
6-1-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions					Y
SIP Regulation 6	**Particulate Matter and Visible Emissions (09/04/98)**					
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
			BAAQMD Condition #9668, Part 8	Source Test P/Every 5 years	Every 5 years	Y
			BAAQMD Condition #9668, Part 5	Record keeping of preventative maintenance P/W	Once every six months	Y
6-305	Visible Particles					Y
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
			BAAQMD Condition #9668, Part 8	Source Test P/Every 5 years	Every 5 years	Y
			BAAQMD Condition #9668, Part 5	Record keeping of preventative maintenance P/W	Once every six months	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
			BAAQMD Condition #9668, Part 8	Source Test P/Every 5 years	Every 5 years	Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-25 Holding Furnace abated by A-25 Fume Baghouse						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
			BAAQMD Condition #9668, Part 5	Record keeping of preventative maintenance P/W	Once every six months	Y
6-401	Appearance of Emissions					Y
6-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions					Y
BAAQMD Condition #9668						
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
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
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
Part 7	Gray iron throughput record keeping requirement					Y
Part 8	Source testing requirement for PM and opacity					Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-28 Storage Silo (Baghouse Dust) abated by A-19 Cupola Baghouse						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
BAAQMD Regulation 6, Rule 1	**Particulate Matter (12/05/07)**					
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
			CAM Condition #25039, Part 21	Pressure drop monitoring P/D	Once every six months	Y
			BAAQMD Condition #9351, Part 11; CAM Condition #25039, Part 27	Source Test P/Every 5 years	Every 5 years	Y
6-1-305	Visible Particles					Y
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
			CAM Condition #25039, Part 21	Pressure drop monitoring P/D	Once every six months	Y
			BAAQMD Condition #9351, Part 11; CAM Condition #25039, Part 27	Source Test P/Every 5 years	Every 5 years	Y
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
			CAM Condition #25039, Part 21	Pressure drop monitoring P/D	Once every six months	Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-28 Storage Silo (Baghouse Dust) abated by A-19 Cupola Baghouse						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
			BAAQMD Condition #9351, Part 11; CAM Condition #25039, Part 27	Source Test P/Every 5 years	Every 5 years	Y
6-1-401	Appearance of Emissions					Y
6-1-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions					Y
SIP Regulation 6	**Particulate Matter and Visible Emissions (09/04/98)**					
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
			CAM Condition #25039, Part 21	Pressure drop monitoring P/D	Once every six months	Y
			BAAQMD Condition #9351, Part 11; CAM Condition #25039, Part 27	Source Test P/Every 5 years	Every 5 years	Y
6-305	Visible Particles					Y
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
			CAM Condition #25039, Part 21	Pressure drop monitoring P/D	Once every six months	Y
			BAAQMD Condition #9351, Part 11;	Source Test P/Every 5 years	Every 5 years	Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-28 Storage Silo (Baghouse Dust) abated by A-19 Cupola Baghouse						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
			CAM Condition #25039, Part 27			
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
			CAM Condition #25039, Part 21	Pressure drop monitoring P/D	Once every six months	Y
			BAAQMD Condition #9351, Part 11; CAM Condition #25039, Part 27	Source Test P/Every 5 years	Every 5 years	Y
6-401	Appearance of Emissions					Y
6-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions					Y
BAAQMD Condition #10762						
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
Part 7	Record keeping requirements (Basis: Regulation 2-1-403)					Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-31 Emergency Standby Diesel Generator						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
BAAQMD Regulation 6, Rule 1	**Particulate Matter (12/05/07)**					
6-1-303.1	Ringelmann Number 2 Limitation	OPACITY Ringelmann 2.0 for < 3 min/hr		N		Y
6-1-305	Visible Particles					Y
6-1-310	Particulate Weight Limitation	FILTERABLE PARTICULATE 0.15 gr/dscf		N		Y
6-1-401	Appearance of Emissions					Y
SIP Regulation6	**Particulate Matter and Visible Emissions (09/04/98)**					
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
BAAQMD Regulation 9, Rule 1	**Inorganic Gaseous Pollutants: Sulfur Dioxide (3/15/1995)**					
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
AQMD Regulation 9, Rule 8	**Inorganic Gaseous Pollutants: NOx and CO from Stationary Internal Combustion Engines (7/25/2007)**					
9-8-110.5	Exemption Emergency Standby engines					Y
9-8-330	Emergency Standby Engines, Hours of Operation					Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-31 Emergency Standby Diesel Generator						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
9-8-330.1	Emergency Standby Engines, Hours of Operation	Unlimited hours for emergency use				Y
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
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
9-8-530	Emergency Standby Engines, Monitoring and Recordkeeping					Y
SIP Regulation 9, Rule 8	**Inorganic Gaseous Pollutants: NOx and CO from Stationary Internal Combustion Engines (12/15/1997)**					
9-8-101	Exclusion: Emergency Standby Engines					Y
40 CFR Part 63, Subpart ZZZZ	**National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (3/09/11)**					
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

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-31 Emergency Standby Diesel Generator						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
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
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

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-31 Emergency Standby Diesel Generator						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
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					Y
63.6655(e)(2)	What records must I keep? – maintenance records					Y
	demonstrating operation and maintenance according to your maintenance plan					Y
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
BAAQMD Condition # 19947						
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

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-31 Emergency Standby Diesel Generator						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
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 9-8530, 2-6-501, "Stationary Diesel Engine ATCM" CA Code of Regulations, Title 17, section 93115.10(g)]					Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-32 Flow Jet Pipe Labeler						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
BAAQMD Regulation 8, Rule 4	**General Solvent and Surface Coating Operations (10/16/02)**					
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
8-4-312	Solvent Evaporative Loss Minimization					Y
8-4-501	Record keeping requirements					Y
8-4-603	Analysis of Samples					Y
BAAQMD Regulation 8, Rule 19	**Surface Preparation and Coating of Miscellaneous Metal Parts and Products (10/16/02)**					
8-19-117	Exemption, Stencil Coatings					Y
NESHAP 40 CFR Part 63, Subpart MMMM	**National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (04/20/06)**					
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	Organic HAP ≤ 2.6 lb/gal of coating solids used during each 12-month compliance period	§63.3930	Record keeping P/M	Every six months	Y
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

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-32 Flow Jet Pipe Labeler						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
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
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
63.3940	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

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

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-14 Fittings Dip Barrel S-34 Pipe Finishing Dip Tank (P2, P3) S-35 Pipe Finishing Dip Tank (P4) S-36 Pipe Finishing Dip Tank (P5, P6) S-43 Pipe Finishing Dip Tank (P1)						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
BAAQMD Regulation 8, Rule 19	**Surface Preparation and Coating of Miscellaneous Metal Parts and Products (10/16/02)**					
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
8-19-320	Solvent Evaporative Loss Minimization					Y
8-19-501	Record keeping requirements					Y
8-19-601	Analysis of Samples					Y
NESHAP 40 CFR Part 63, Subpart MMMM	**National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (04/20/06)**					
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	Organic HAP ≤ 2.6 lb/gal of coating solids used during each 12-month compliance period	§63.3930	Record keeping P/M	Every six months	Y
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
63.3892	Operating limit – Exemption for compliant material option					Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-14 Fittings Dip Barrel S-34 Pipe Finishing Dip Tank (P2, P3) S-35 Pipe Finishing Dip Tank (P4) S-36 Pipe Finishing Dip Tank (P5, P6) S-43 Pipe Finishing Dip Tank (P1)						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
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
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
63.3940	Initial Compliance demonstration date - §63.3883					Y
63.3941	Initial Compliance demonstration methods					Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-14 Fittings Dip Barrel S-34 Pipe Finishing Dip Tank (P2, P3) S-35 Pipe Finishing Dip Tank (P4) S-36 Pipe Finishing Dip Tank (P5, P6) S-43 Pipe Finishing Dip Tank (P1)						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
63.3942(a)	Continuous Compliance demonstration	Comply with §63.3890	§63.3930	Record keeping P/M	Every six months	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
Table 3 to Subpart MMMM of Part 63	Default Organic HAP Mass Fraction for Solvents and Solvent Blends					Y
BAAQMD Condition #24639	**For S-34, S-35, S-36, S-43**					
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
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
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
Part 4	Abatement requirement – S-34, S-35, S-36 abated by A35 and A-36 (Basis: Cumulative Increase)					N – See Section 2 of this report.

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-14 Fittings Dip Barrel S-34 Pipe Finishing Dip Tank (P2, P3) S-35 Pipe Finishing Dip Tank (P4) S-36 Pipe Finishing Dip Tank (P5, P6) S-43 Pipe Finishing Dip Tank (P1)						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
Part 5	A-35 and A-36 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
Part 7	Temperature measuring and recording device requirement for each S-34, S-35, S-36, S-43					N – Data Loss occurred for a period of eight production days, between January 2, 2019 and January 17, 2019.
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
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, S35, S-36, S-43 (Basis: Record keeping)					Y
Part 11b	Record keeping requirements Operating hours of A-35 and A-36 (Basis: Record keeping)					Y
Part 11c	Maintenance Records for A-35 and A-36 (Basis: Record keeping)					Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-14 Fittings Dip Barrel S-34 Pipe Finishing Dip Tank (P2, P3) S-35 Pipe Finishing Dip Tank (P4) S-36 Pipe Finishing Dip Tank (P5, P6) S-43 Pipe Finishing Dip Tank (P1)						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
Part 12	Shutdown requirement for cutback asphalt dip tanks (Basis: Contemporaneous emission reduction credits)					Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-38 Vertical Asphalt Storage Tank #1 (exempt) S-39 Vertical Asphalt Storage Tank #2 (exempt)						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
BAAQMD Regulation 2, Rule 1						
2-1-123.3.7	Exemption from permit requirements (storage of asphalt with a sulfur content < 0.5%)					Y
BAAQMD Regulation 8, Rule 5	**Storage of Organic Liquids (10/18/06)**					
8-5-117	Limited Exemption, Low Vapor Pressure (≤ 0.5 psia)					Y
SIP Regulation 8, Rule 5	**Storage of Organic Liquids (06/05/03)**					
8-5-117	Limited Exemption, Low Vapor Pressure (≤ 0.5 psia)					Y
NESHAP 40 CFR Part 63, Subpart MMMM	**National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (04/20/06)**					
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
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

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-38 Vertical Asphalt Storage Tank #1 (exempt) S-39 Vertical Asphalt Storage Tank #2 (exempt)						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
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
Table 3 to Subpart MMMM of Part 63	Default Organic HAP Mass Fraction for Solvents and Solvent Blends					Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-46 – Sand Storage Bunker S-47 – Storage Piles S-50 Slurry Mix Stations						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
BAAQMD Regulation 6, Rule 1	**Particulate Matter (12/05/07)**					
6-1-301	Ringelmann 1.0 Limitation	OPACITY Ringelmann 1.0 < 3 min/hr				Y
6-1-305	Visible Particles					Y
6-1-311	General Operations	FILTERABLE PARTICULATE $4.10P^{0.67}$ lb/hr where P is process weight, ton/hr				Y
6-1-401	Appearance of Emissions					Y
6-1-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions					Y
SIP Regulation 6	**Particulate Matter and Visible Emissions (09/04/98)**					
6-301	Ringelmann 1.0 Limitation	OPACITY Ringelmann 1.0 < 3 min/hr				Y
6-305	Visible Particles					Y
6-310	Particulate Weight Limitation	FILTERABLE PARTICULATE 0.15 gr/dscf				Y
6-311	General Operations	FILTERABLE PARTICULATE $4.10P^{0.67}$ lb/hr. where P is process weight, ton/hr				Y
6-401	Appearance of Emissions					Y
6-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions					Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-51 Specialty Finishing Paint Dip Tanks						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
BAAQMD Regulation 8, Rule 19	**Surface Preparation and Coating of Miscellaneous Metal Parts and Products (10/16/02)**					
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
8-19-320	Solvent Evaporative Loss Minimization					Y
8-19-501	Record keeping requirements					Y
8-19-601	Analysis of Samples					Y
NESHAP 40 CFR Part 63, Subpart MMMM	**National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (04/20/06)**					
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	Organic HAP ≤ 2.6 lb/gal of coating solids used during each 12-month compliance period	§63.3930	Record keeping P/M	Every six months	Y
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
63.3892	Operating limit – Exemption for compliant material option					Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-51 Specialty Finishing Paint Dip Tanks						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
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
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
63.3940	Initial Compliance demonstration date - §63.3883					Y
63.3941	Initial Compliance demonstration methods					Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-51 Specialty Finishing Paint Dip Tanks						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
63.3942(a)	Continuous Compliance demonstration	Comply with §63.3890	§63.3930	Record keeping P/M	Every six months	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
Table 3 to Subpart MMMM of Part 63	Default Organic HAP Mass Fraction for Solvents and Solvent Blends					Y
BAAQMD Condition # 25748	**For S-51**					
Part 1	Material throughput limit for S-51 (Basis: Cumulative Increase)	1000 gallon rust inhibitor and 500 gallon of grey/any consecutive 12-month period	BAAQMD Condition # 25748, Part 3	Record keeping P/M	Once every six months	Y

Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements S-52 No Bake Molding System						
Applicable Requirement	**Regulation Title or Description of Requirement**	**Limit**	**Monitoring Citation**	**Monitoring & Frequency**	**Reporting**	**Compliance (Y / N)**
BAAQMD Regulation 8, Rule 4	**General Solvent and Surface Coating Operations (10/16/02)**					
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
8-4-312	Solvent Evaporative Loss Minimization					Y
8-4-501	Record keeping requirements					Y
8-4-603	Analysis of Samples					Y
BAAQMD Condition # 25437	**For S-52**					
Part 1	Throughput limit (Basis: Cumulative Increase)	Techniset binder limit ≤ 43,880 gallons combined ≤ 251,442 gallons during any consecutive 12month period	BAAQMD Condition # 25437, Part 3 and 4	Record keeping P/M	Once every six months	Y
Part 2	Abatement Requirement by S-1 and A-21 and A-25		63.7740(a); BAAQMD Condition #9351, Part 2	Temperature monitor C	Once every six months	Y

SECTION 3
NESHAP EEEEE SEMI-ANNUAL REPORT

The semi-annual reporting requirements for 40 CFR, Part 63, Subpart EEEEE - NESHAP for Iron and Steel Foundries are included in §63.7751(b) and are presented in Sections 3.1 through 3.9 below.

The visible emission opacity requirements per §63.7731 are included in Section 3.10.

3.1 Company Name and Address (§63.7751(b)(1))

AB&I Foundry, a division of McWane, Inc.
7825 San Leandro Street
Oakland, CA 94621

3.2 Statement by Responsible Official (§63.7751(b)(2))

Certified by a Responsible Official to be true, accurate and complete in Section 1.

3.3 Reporting Period Dates (§63.7751(b)(3))

The date of the report is provided on the cover letter and the reporting period is September 1, 2018 through February 28, 2019.

3.4 Periodic Startup, Shutdown and Malfunction (§63.7751(b)(4))

AB&I operations were performed in a manner consistent with the SSM Plan. The information in §63.10(d)(5)(i) is provided below.

3.4.1 SSM Reports (§63.10(d)(5)(i))

The General Provisions of 40 CFR 63 require development of a SSM Plan for the affected facilities subject to Subpart EEEEE, NESHAP from Iron & Steel Foundries. During the reporting period, the procedures of the SSMP were followed for SSM events. An SSM Log is included in Attachment 3-1. This report is certified in Section 1 by a Responsible Official to be true, accurate, and complete.

3.5 Deviations (§63.7751(b)(5))

There were deviations identified during this reporting period and are included under §63.7751(b)(7) and (8) in Section 3.7 and Section 3.8 of this report.

3.6 Continuous Monitoring System (CMS) Out of Control Period (§63.7751(b)(6))

There were no periods during which a CMS was out-of-control as specified by §63.8(c)(7) during this reporting period.

3.7 Deviations from Emission Limit Not Using CMS or Work Practice Standards (§63.7751(b)(7))

There were no deviations identified during this reporting period. Refer to the attached deviation report summary (see Attachment 3-2).

3.7.1 Total Operating Time of the Affected Sources with Deviations (§63.7751(b)(7)(i))

Refer to the attached deviation report summary (see Attachment 3-2).

3.7.2 For deviations from Emissions Limitation not using CMS or Work Practice Standards, information on the number, duration and cause of deviations and the corrective action taken (§63.7751(b)(7)(ii))

Refer to the attached deviation report summary (see Attachment 3-2).

3.8 For deviations from Emissions Limitation or Work Practice Standard using a CMS, information on the number, duration and cause of deviations and the corrective action taken (§63.7751(b)(8)(i)-(vii))

There were 4 deviations identified during this reporting period, however the details of these events are still under investigation. Refer to the attached deviation report summary (see Attachment 3-3).

3.9 Description of the Process Unit and Continuous Monitoring Systems (§63.7751(b)(8)(viii)-((xi))

AB&I operates an iron foundry in Oakland, CA for the production of cast iron in the manufacturing of water, sewer, and specialty fittings. Iron scrap is melted in a cupola furnace and the molten metal is poured into molds.

Cupola

The cupola is a metal melting furnace equipped with a side charge system and overhead emission capture and control system. The cupola capture and control system uses a combustion chamber to destroy the VOHAP and a baghouse to control metal HAP emissions. The combustion chamber is equipped with a thermocouple, which is the continuous parameter monitoring system (CPMS) that measures temperature in the combustion chamber. The cupola capture system is equipped with a draft pressure sensor in the cross-over duct (i.e., the vent gas pipe from the top of the cupola to the afterburner). The draft pressure sensor is the CPMS that measures capture system performance. The cupola combustion chamber operating temperature limit is greater than or equal to 1,300 degrees Fahrenheit for a 15-minute averaging period. The draft pressure

sensor operating limit is less than or equal to 0.2 inches of water column (in. H_20) vacuum for a 3-hour averaging period.

Disa 270 Pouring Station

The Disa 270 pouring station uses a vent hood and baghouse, and building structures, to control metal HAP emissions.

Disa 2013 Pouring Station

The Disa 2013 pouring station uses a vent hood and baghouse, and building structures, to control metal HAP emissions.

The cupola chamber thermocouples and draft pressure sensor are inspected, calibrated and maintained per the Operation & Maintenance Plan (OMP).

A CMS performance evaluation for the cupola chamber thermocouples and draft pressure sensor was conducted during the initial performance test. There were no changes of the continuous monitoring systems, processes, or controls since the last reporting period.

3.10 Visible Emissions (§63.7731(b))

A Visible Emissions Evaluation Test (Method 9) was completed by Montrose Air Quality Services, LLC for building and structures on December 10-11, 2018, and was below opacity limits. A copy of the test is included in this report.

Attachment 3-1
Malfunction Log

AB&I Foundry (AB&I)
Oakland, CA
MACT EEEEE Semi-Annual Report
Attachment 3-1 Malfunctions (§63.7751(b)(4) and (b)(8))

Malfunction Start Date / Time	Malfunction End Date / Time	Malfunction Issue Decription	Malfunction Time (hr)	Malfunction Deviation Code
None				
		MALFUNCTION TOTAL TIME:	0.00	

Requirement Citation: 40 CFR 63.7751(b)(4) and (b)(8)(i)

Deviation Code: Startup (SU), Shutdown (SD), Control Equipment Problems (C), Process Problems (P), Other Known Causes (O), Unknown Cause (U)

Attachment 3-2
Deviations without CMS

AB&I Foundry (AB&I)
Oakland, CA
MACT EEEEE Semi-Annual Report
Attachment 3-2 Deviations without CMS (§63.7751(b)(7))

Company Name:	AB&I Foundry	Location:	Oakland, CA	Plant No.	A0062
Report Period Began:	September 1, 2018	Report Period Ended:	February 28, 2019	Report Submittal Date	March 29, 2019

ID Number (Rq'd if Applicable)	Work Order Description or Description of Deviation	Event Frequency	Event No.	Deviation Period				Number of Deviations	Cause of Deviation	Corrective Action Taken To Remedy or Mitigate Deviation Situation
				Start Date	Start Time	End Date	End Time			
None										
							TOTAL DEVIATIONS:	0		
							Estimated 270 DISA Equipment Operating Time (hours):	1237.5		
							Estimated 2013 DISA Equipment Operating Time (hours):	440.5		
							Equipment Deviation Time (hours):	0.00		

Note: All elements except Event No. are required for each period of deviation

N/A = Not Applicable

Attachment 3-3
Deviations with CMS

AB&I Foundry (AB&I)
Oakland, CA
MACT EEEEE Semi-Annual Report
Attachment 3-3 Deviations with CMS (§63.7751(b)(8))

Source	Date	Deviation Issue Description	Deviation Period[1]	Deviation Code[2]	Deviation Start Time[3]	Deviation End Time[3]	Deviation Total Time (hr)
S-1	1/2/2019	Draft Pressure Under 0.2" water	O	C	7:11 AM	8:50 AM	1.65
S-1	1/17/2019	Draft Pressure Under 0.2" water	O	C	8:30 AM	8:45 AM	0.25
S-1	1/21/2019	Draft Pressure Under 0.2" water	O	C	9:58 AM	10:57 AM	0.98
S-1	1/31/2019	Draft Pressure Under 0.2" water	O	C	8:00 AM	8:30 AM	0.50
						TOTAL CUPOLA (hr)	3.38
Cupola Operating Time (hr)	1059.4		Cupola Deviation Time[4]		0.32%		

Requirement Citation: 40 CFR 63.7751(b)(8)(iv) and (vi)

[1] Deviation Period: Specify the following type of period for each deviation: Startup (SU), Shutdown (SD), Malfunction (M) or Other (O)

[2] Deviation Code: Startup (SU), Shutdown (SD), Control Equipment Problems (C), Process Problems (P), Other Known Causes (O), Unknown Cause (U)

[3] Note: Deviation times are the beginning and end of deviation for the entire day. Various instances occur during the day of in and out of deviation.

[4] Note: Percent of Operating Time

SECTION 4
NESHAP MMMM SEMI-ANNUAL REPORT

The semi-annual reporting requirements for 40 CFR, Part 63, Subpart MMMM - Surface Coating of Miscellaneous Metal Parts and Products are included in §63.3920 and are presented in Sections 4.1 through 4.11 below.

4.1 Company Name and Address [§63.3910(c)(1)]

Mailing Address	*Physical Address*
AB&I Foundry 7825 San Leandro Street Oakland, CA 94621	AB&I Foundry 7825 San Leandro Street Oakland, CA 94621

4.2 Statement by Responsible Official [§63.3910(c)(2)]

The information in this report is certified in Section 1 by the Responsible Official to be true, accurate, and complete.

4.3 Reporting Period [§63.3910(c)(3)]

The reporting period is the compliance period as described in §63.3950 and begins on September 1, 2016 and ends on February 28, 2017.

4.4 Identification of the Compliance Option [§63.3910(c)(4)]

AB&I Foundry has opted to comply with "Compliant Material" as specified in §63.3891(a). AB&I Foundry demonstrated that, based on the coatings, thinners and/or other additives, and cleaning materials used in its coating operation(s), the organic hazardous air pollutants (HAP) emission rate for the coating operation(s) is less than or equal to the applicable emission limit in §63.3890(b)(1), calculated as a rolling 12-month emission rate and determined on a monthly basis.

4.5 Statement of Compliance for the Initial Compliance Period [§63.3910(c)(5)]

AB&I Foundry has demonstrated that the organic HAP emission rate for its coating operations is less than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

4.6 Deviations [§63.3910(c)(6)(i) and (ii)]

There were no deviations during the reporting period.

4.7 Demonstration of Compliance with the Compliant Material [§63.3910(c)(7)]

Attachment 4-1 contains copies of the data items listed in paragraphs (c)(7)(i) through (iv) of this section that is required by the compliance option "Compliant Coatings" to demonstrate compliance with the emission limit. The data includes an example of how AB&I Foundry determined the value, including calculations and supporting data.

4.8 Calculation of the 12-month Organic HAP Emission Rate [§63.3910(c)(8)(ii)]

Attachment 4-2 contains the calculation of the total mass of organic HAP emissions for each month and the calculation of the 12-month organic HAP emission rate of §63.3951.

4.9 Emission Rate with Add-On Controls [§63.3910(c)(9)]

Not Applicable – There were no add-on controls installed.

4.10 Single Emission Limit for Predominant Activity [§63.3910(c)(10)]

Not Applicable – AB&I Foundry does not adhere to a single emission limit representing predominant activity pursuant to §63.3890(c)(1).

4.11 Calculation of the 12-month Organic HAP Emission Rate [§63.3910(c)(11)]

Not Applicable – AB&I Foundry does not adhere to a facility-specific emission limit pursuant to §63.3890(c)(2).

Attachment 4-1
Surface Coating Supporting Data

ABI Foundry
MACT MMMM Analysis

Hot Dip Pipe Coating - SAPC-100

Total Volatile Matter	0.73%	Wt %
HAP	0.3%	Wt %
Density	8.68	lbs/gal
VOC	0	lbs/gal

V=1-(Mvolatile)/Davg

Mvolatile	0.06	lb/gal
Davg	6.60	lb/gal

Volatile Matter		CAS #	Wt %	Density (lb/gal)	%	D average (lb/gal)
Synthetic Wetting Agents			10%		0%	0.00
Petroleum Asphalt		8052-42-4	85%	8.68	0.00	0.00
Formaldehyde	@500 F	50-00-0	0.08%	6.78	11%	0.74
Acetaldehyde	@500 F	75-07-0	0.15%	6.57	21%	1.35
Propionaldehyde	@500 F	123-38-6	0.05%	6.76	7%	0.46
Speciated Organic	@500 F	Various (non-HAP)	0.45%	6.5	62%	4.04
			95.7342			6.60

V= (1-(Mvol/Davg))= 0.9904 $\frac{\text{gal solids}}{\text{gal coating}}$

Volume used per Month 7,399 gal/month

Mass HAPs = HAP wt% * Density * Monthly Volume 179.83 lbs HAPs / month

Total Volatile Solids = V * Monthly Volume 7328.13 gal solids / month

Organic HAP @ 400 F **0.00** $\frac{\text{lbs HAPs}}{\text{gal solids}}$ is less than **2.6** $\frac{\text{lbs HAPs}}{\text{gal solids}}$ Standard

Organic HAP @ 500 F **0.02** $\frac{\text{lbs HAPs}}{\text{gal solids}}$

Limit of 500° F on pipe dip

ABI Foundry
MACT MMMM Analysis

Promar Exterior Latex Satin - "Tyler Blue"

Total Volatile Matter	74%	Wt %	
HAP	0%	Wt %	
Density	8.81	lbs/gal	8.311321
VOC	0.77	lbs/gal	

V=1-(Mvolatile)/Davg

Mvolatile	6.52	lb/gal
Davg	8.35	lb/gal

Volatile Matter	CAS #	Wt %	Density (lb/gal)	%	D average (lb/gal)
Heavy Paraffinic Oil	64742-54-7	1%	9	1%	0.12
Water		73%	8.34	99%	8.23
		74			8.35

V= (1-(Mvol/Davg))= 0.2191 $\frac{\text{gal solids}}{\text{gal coating}}$

Volume used per Month 5.67 gal/month

Mass HAPs = HAP wt% * Density * Monthly Volume 0.00 $\frac{\text{lbs HAPs}}{\text{month}}$

Total Volatile Solids = V * Monthly Volume 1.24 $\frac{\text{gal solids}}{\text{month}}$

Organic HAP **0.00** $\frac{\text{lbs HAPs}}{\text{gal solids}}$ is less than **2.6** $\frac{\text{lbs HAPs}}{\text{gal solids}}$ Standard

ABI Foundry
MACT MMMM Analysis

Stiles 1164- Aluminum "ABI Silver"

Total Volatile Matter	72%	Wt %
HAP	0%	Wt %
Density	8.88	lbs/gal
VOC	2.84	lbs/gal

V=1-(Mvolatile)/Davg

Mvolatile	6.40	lb/gal
Davg	8.17	lb/gal

Volatile Matter	CAS #	Wt %	Density (lb/gal)	%	D average (lb/gal)
2-Butoxyethanol	111-76-2	5.0%	7.5	7%	0.52
Ammonium Hydroxide	1336-21-6	5.0%	7.59	7%	0.53
HEXYLENE GLYCOL	107-41-5	0.5%	7.67	1%	0.05
NON-LEAFING ALUMINIUM PASTE		10%	8	14%	1.11
Water		52%	8.34	71%	5.96
		72			8.17

V= (1-(Mvol/Davg))= 0.2158 $\frac{\text{gal solids}}{\text{gal coating}}$

Volume used per Month 15.83 gal/month

Mass HAPs = HAP wt% * Density * Monthly Volume 0.00 $\frac{\text{lbs HAPs}}{\text{month}}$

Total Volatile Solids = V * Monthly Volume 3.42 $\frac{\text{gal solids}}{\text{month}}$

Organic HAP **0.00** $\frac{\text{lbs HAPs}}{\text{gal solids}}$ is less than **2.6** $\frac{\text{lbs HAPs}}{\text{gal solids}}$ Standard

ABI Foundry
MACT MMMM Analysis

White Pigmented Ink - SCP-920A

Total Volatile Matter	70.00%	Wt %
HAP	0%	Wt %
Density	9.74	lbs/gal
VOC	0.42	lbs/gal

V=1-(Mvolatile)/Davg

Mvolatile	6.82	lb/gal
Davg	6.71	lb/gal

Volatile Matter	CAS #	Wt %	Density (lb/gal)	%	D average (lb/gal)
Acetone	67-64-1	45%	6.5649	64%	4.22
Tertiary Butyl Acetate	540-88-5	15%	7.18815	21%	1.54
Methyl Ethyl Ketone (MEK)*	78-93-3	5%	6.7311	7%	0.48
Isopropanol	67-63-0	5%	6.5649	7%	0.47
20% solids per manufacturer		70%			
					6.71

*MEK no longer listed as an HAP per EPA (40 CFR Part 63 [OAR–2003–0028, FRL–8009–5] RIN: 2060–AI72)

V= (1-(Mvol/Davg))= -0.0160 gal solids / gal coating

Volume used per Month 57.50 gal/month

Mass HAPs = HAP wt% * Density * Monthly Volume 0.00 lbs HAPs / month

Total Volatile Solids = V * Monthly Volume -0.92 gal solids / month

Organic HAP **0.00** lbs HAPs / gal solids is less than **2.6** lbs HAPs / gal solids Standard

ABI Foundry
MACT MMMM Analysis

White Ink Cleaner - Acetone

Total Volatile Matter	100%	Wt %
HAP	0%	Wt %
Density	6.56	lbs/gal
VOC	0	lbs/gal

V=1-(Mvolatile)/Davg

Mvolatile	6.56	lb/gal
Davg	6.56	lb/gal

Volatile Matter	CAS #	Wt %	Density (lb/gal)	%	D average (lb/gal)
Acetone	67-64-1	100%	6.5649	100%	6.56
		100			6.56

V= (1-(Mvol/Davg))= 0.00 $\frac{\text{gal solids}}{\text{gal coating}}$

Volume used per Month 2.42 gal/month

Mass HAPs = HAP wt% * Density * Monthly Volume 0.00 $\frac{\text{lbs HAPs}}{\text{month}}$

Total Volatile Solids = V * Monthly Volume 0.00 $\frac{\text{gal solids}}{\text{month}}$

Organic HAP **0.00** $\frac{\text{lbs HAPs}}{\text{gal solids}}$ is less than **2.6** $\frac{\text{lbs HAPs}}{\text{gal solids}}$ Standard

ABI Foundry
MACT MMMM Analysis

Fitting Dip - MPFC-D8D

Total Volatile Matter	6%	Wt %	
HAP	0%	Wt %	
Density	8.48	lbs/gal	8.311321
VOC		lbs/gal	

V=1-(Mvolatile)/Davg

Mvolatile	0.51	lb/gal
Davg	8.48	lb/gal

Volatile Matter	CAS #	Wt %	Density (lb/gal)	%	D average (lb/gal)
Asphalt, Petroleum	8052-42-4	6%	8.48	100%	8.48
		6			8.48

V= (1-(Mvol/Davg))= 0.9400 $\frac{\text{gal solids}}{\text{gal coating}}$

Volume used per Month[1] 2,063 gal/month

Mass HAPs = HAP wt% * Density * Monthly Volume 0.00 $\frac{\text{lbs HAPs}}{\text{month}}$

Total Volatile Solids = V * Monthly Volume 1938.81 $\frac{\text{gal solids}}{\text{month}}$

Organic HAP **0.00** $\frac{\text{lbs HAPs}}{\text{gal solids}}$ is less than **2.6** $\frac{\text{lbs HAPs}}{\text{gal solids}}$ Standard

ABI Foundry
MACT MMMM Analysis

Rust Inhibitor-Black

Total Volatile Matter	65%	Wt %	
HAP	0%	Wt %	
Density	11.20	lbs/gal	(weigh container)
VOC		lbs/gal	

V=1-(Mvolatile)/Davg

Mvolatile	7.28	lb/gal
Davg	8.31	lb/gal

Volatile Matter	CAS #	Wt %	Density (lb/gal)	%	D average (lb/gal)
Ethylene Glycol N-Butyl Ether	111-76-2	5%	7.923	8%	0.61
Deionized water	7732-18-5	60%	8.34	92%	7.70
		65			8.31

V= (1-(Mvol/Davg))= 0.1235 $\frac{\text{gal solids}}{\text{gal coating}}$

Volume used per Month 0.58 gal/month

Mass HAPs = HAP wt% * Density * Monthly Volume 0.00 $\frac{\text{lbs HAPs}}{\text{month}}$

Total Volatile Solids = V * Monthly Volume 0.07 $\frac{\text{gal solids}}{\text{month}}$

Organic HAP **0.00** $\frac{\text{lbs HAPs}}{\text{gal solids}}$ is less than **2.6** $\frac{\text{lbs HAPs}}{\text{gal solids}}$ Standard

ABI Foundry
MACT MMMM Analysis

ST-1722 Med Gray

Total Volatile Matter	53%	Wt %
HAP	0%	Wt %
Density	12.10	lbs/gal
VOC	0.69	lbs/gal

V=1-(Mvolatile)/Davg

Mvolatile	6.38	lb/gal
Davg	8.46	lb/gal

Volatile Matter	CAS #	Wt %	Density (lb/gal)	%	D average (lb/gal)
2-Butoxyethanol	111-76-2	5%	7.506	9%	0.71
2-Amino-2-Methyl-1-Propanol	124-68-5	0.5%	7.79	1%	0.07
Water		49%	8.34	92%	7.68
		54			8.46

V= (1-(Mvol/Davg))= 0.2464 $\frac{\text{gal solids}}{\text{gal coating}}$

Volume used per Month 0.00 gal/month

Mass HAPs = HAP wt% * Density * Monthly Volume 0.00 $\frac{\text{lbs HAPs}}{\text{month}}$

Total Volatile Solids = V * Monthly Volume 0.00 $\frac{\text{gal solids}}{\text{month}}$

Organic HAP **0.00** $\frac{\text{lbs HAPs}}{\text{gal solids}}$ is less than **2.6** $\frac{\text{lbs HAPs}}{\text{gal solids}}$ Standard

ABI Foundry
MACT MMMM Analysis

ST-1688 Satin Gray

Total Volatile Matter	54%	Wt %
HAP	0%	Wt %
Density	11.44	lbs/gal
VOC	0.88	lbs/gal

V=1-(Mvolatile)/Davg

Mvolatile	6.17	lb/gal
Davg	8.27	lb/gal

Volatile Matter	CAS #	Wt %	Density (lb/gal)	%	D average (lb/gal)
2-butoxyethanol	111-76-2	5%	7.506	9%	0.70
2-Amino-2-Methyl-1-Propanol	124-68-5	0.5%	7.79	1%	0.07
Water		49%	8.34	90%	7.51
		54			8.27

V= (1-(Mvol/Davg))= 0.2549 $\frac{\text{gal solids}}{\text{gal coating}}$

Volume used per Month 0.00 gal/month

Mass HAPs = HAP wt% * Density * Monthly Volume 0.00 $\frac{\text{lbs HAPs}}{\text{month}}$

Total Volatile Solids = V * Monthly Volume 0.00 $\frac{\text{gal solids}}{\text{month}}$

Organic HAP **0.00** $\frac{\text{lbs HAPs}}{\text{gal solids}}$ <>= **2.6** $\frac{\text{lbs HAPs}}{\text{gal solids}}$ Standard

Attachment 4-2
Surface Coating Monthly Usage

SURFACE COATING MACT MMMM
Monthly Usage (gallons)

Total HAP/month (pounds)	12-Month Organic HAP (lbs HAPs/gal solids)	Tyler Blue	Stiles 1164- Aluminum "ABI Silver"	White Ink (SCP-920A)	White Ink Cleaner (SCP-900C)	Fitting Dip	RI-Black	ST-1722 Gray	ST-1688 Satin Gray	SAPC-100 Hot Dip <500 F	SAPC-100 Hot Dip >500 F
		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02
0.00	Jan-18	5	5	55	6	1,100	4.5	0	19	5,172	0
0.00	Feb-18	5	10	50	2	1,925	4	12	0	9,674	0
0.00	Mar-18	5	5	50	1	1,375	6	0	7	8,386	0
0.00	Apr-18	15	20	55	2	2,200	9	0	0	15,433	0
0.00	May-18	15	25	80	1.6	3,025	13	0	0	11,623	0
0.00	Jun-18	15	25	45	1	2,475	9.5	0	0	7,206	0
0.00	Jul-18	15	20	75	1.9	1,925	16	0	0	9,987	0
0.00	Aug-18	15	30	85	2.4	1,925	0	5	5	13,760	0
0.00	Sep-18	10	30	80	2.6	2,475	3.5	0	0	10,284	0
0.00	Oct-18	0	10	50	5	825	0	0	0	0	0
0.00	Nov-18	3	15	60	2.4	2,750	0	0	0	10,219	0
0.00	Dec-18	1	5	50	1.5	1,925	0	0	0	7,044	0
0.00	**YTD Total**										
0.00	Jan-19	5	20	50	1	2,750	0	0	0	8,978	0
0.00	Feb-19	15	15	55	2	1,650	0	0	0	7,870	0