

**MORE  
THAN  
JUST  
PIPE.**



**UNITED STATES PIPE AND FOUNDRY COMPANY, LLC**

1295 WHIPPLE ROAD  
UNION CITY, CALIFORNIA 94587  
(510) 441-5810

January 24, 2020

Bay Area Air Quality Management District  
Director of Enforcement  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**Subject: Title V Monitoring Report – Facility #A0083**

Dear Mr. Wayne Kino:

United States Pipe and Foundry Company, LLC, Union City Pipe Plant, is required to submit a semi-annual report because of the standard condition in Section 1 of the Major Facility Review Permit. In Accordance with the C& E Advisor, dated December 5, 1997, the following summary is provided for the reporting period from **July 1 through December 31, 2019:**

In accordance with the permit, the facility conducts Method 22 visible emissions inspections as required by permit conditions for Sources S1, S4, S5, S8, S15, and S16. The facility also conducts regular maintenance inspections of A10 and A12 baghouses in accordance with the permit conditions for Sources S1 and S4. The facility keeps records of the sulfur content of coke received as a surrogate means of ensuring compliance with BAAQMD Regulation 9-1-304. The facility keeps chart recordings of the key parameters related to the operation of source S1. All of the above records have been retained since July 1, 1997 and will be kept for five years in accordance with the permit.

Under penalty of perjury, I certify that the aforementioned is true, accurate, and complete. I also certify that I am the responsible official as defined in District Regulation 2, Rule 6.

Sincerely,  
**UNITED STATES PIPE AND FOUNDRY COMPANY, LLC**

A handwritten signature in black ink, appearing to read "Henry W. Mentink", written over a horizontal line.

Henry W. Mentink  
Plant Manager

cc: D.M. Araza, Environmental Engineer

**BAY AREA AIR QUALITY  
MANAGEMENT DISTRICT**

**2020 JAN 28 PM 12: 35**

**RECEIVED**

**Title V Semi-Annual Monitoring Verification Report**  
**US Pipe and Foundry Company, Plant #A0083**  
**July 1 to December 31, 2019**

**Applicable Limits and Compliance Monitoring Requirements**  
**Table VII-A**  
**S-1 Cupola**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301 and SIP 6-301	Y		Ringelmann No.1 ≤ 3 minutes aggregated in any hour	BAAQMD Condition #2274, Parts 4 and 5	C	temperature monitor, pressure drop monitor	Y	
	BAAQMD 6-1-301 and SIP 6-301 <sup>1</sup>	Y		Ringelmann No.1 ≤ 3 minutes aggregated in any hour	BAAQMD Condition #2274, Part 8	P/D	preventative maintenance records	Y	
	BAAQMD 6-1-301 and SIP 6-301	Y		Ringelmann No.1 ≤ 3 minutes aggregated in any hour	BAAQMD Condition #2274, Part 9	P/D	Visible emission monitoring	Y	
	BAAQMD 6-1-301 and SIP 6-301	Y		Ringelmann No.1 ≤ 3 minutes aggregated in any hour	40 CFR 63.10897	C	temperature monitor, pressure drop monitor	Y	
PM	BAAQMD 6-1-305 and SIP 6-305	Y		Fallout of visible particles	BAAQMD Condition #2274, Parts 4 and 5	C	temperature monitor, pressure drop monitor	Y	
FP	BAAQMD 6-1-310 and SIP 6-310	Y		0.15 gr/dscf	BAAQMD Condition #2274, Parts 4 and 5	C	temperature monitor, pressure drop monitor	Y	
	BAAQMD 6-1-310 and SIP 6-310	Y		0.15 gr/dscf	40 CFR 63.10897	C	temperature monitor, pressure drop monitor	Y	

**Title V Semi-Annual Monitoring Verification Report  
US Pipe and Foundry Company, Plant #A0083  
July 1 to December 31, 2019**

**Applicable Limits and Compliance Monitoring Requirements  
Table VII-A  
S-1 Cupola**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
FP	BAAQMD 6-1-311 and SIP 6-311	Y		40 lb/hr	BAAQMD Condition #2274, Parts 4 and 5	C	Temperature monitor, pressure drop monitor	Y	
	BAAQMD 6-1-311 and SIP 6-311	Y		40 lb/hr	40 CFR 63.10897	C	Temperature monitor, pressure drop monitor	Y	
SO <sub>2</sub>	BAAQMD 9-1-301	Y		GLC <sup>1</sup> of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		Y	
	BAAQMD 9-1-302	Y		sulfur emissions not to exceed 300 ppm, dry	BAAQMD Condition #2274, part 7	P/E	Fuel certification; Source test when coke sulfur exceeds 0.75%	Y	
	BAAQMD 9-1-304	Y		sulfur content of solid fuel limited to ensure SO <sub>2</sub> ≤ 300ppmd	BAAQMD condition #2274, part 7	P/E	Fuel certification; Source test when coke sulfur exceeds 0.75%	Y	
SO <sub>2</sub>	BAAQMD Condition #2274, part 7	Y		Sulfur content of coke not to exceed 1.0%	BAAQMD condition #2274, part 7	P/E	Fuel certification	Y	

**Title V Semi-Annual Monitoring Verification Report**  
**US Pipe and Foundry Company, Plant #A0083**  
**July 1 to December 31, 2019**

**Applicable Limits and Compliance Monitoring Requirements**  
**Table VII-A**  
**S-1 Cupola**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Lead	BAAQMD 11-1-301	Y		15 lb/day	BAAQMD Condition #2274, part 10	P/E	Initial Source Test	Y	
	BAAQMD 11-1-302	Y		GLC <sup>1</sup> not to exceed 1.0 ug/m <sup>3</sup> averaged over 24 hrs	BAAQMD Condition #2274, part 10	P/E	Initial Source Test	Y	
PM	40 CFR 63.10895 (c)	Y		0.8 pounds of PM per ton of metal charged	40 CFR 63.10898	P/E	Initial Source Test	Y	
HAP	40 CFR 63.10895 (c)	Y		0.06 pounds of total metal HAP per ton of metal charged	40 CFR 63.10898	P/E	Initial Source Test	Y	
Grey iron throughput	BAAQMD Condition #2274, part 2	Y		600 tons per day	BAAQMD Condition 2274, part 6	P/D	Records	Y	
Afterburner Temperature limit (On-Blast/Reduced Blast)	BAAQMD Condition #2274, part 3	Y		1550oF	BAAQMD Condition 2274, part 5	C	Continuous Temperature monitor/recorder	Y	

**Title V Semi-Annual Monitoring Verification Report**  
**US Pipe and Foundry Company, Plant #A0083**  
**July 1 to December 31, 2019**

**Applicable Limits and Compliance Monitoring Requirements**  
**Table VII-A**  
**S-1 Cupola**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Afterburner Temperature limit (Off-Blast)	BAAQMD Condition #2274, part 3	Y		≥700oF	BAAQMD Condition 2274, part 5	C	Continuous Temperature monitor/recorder	Y	
Baghouse Pressure Drop	BAAQMD Condition #2274, part 4	Y		Pressure drop across bags not to exceed 8 inches water column or to fall below 1 inch water column	BAAQMD Condition #2274, part 13	C	Pressure drop monitor	Y	
TSP	BAAQMD Condition #2274, part 11	Y		0.006 gr/dscf	BAAQMD Condition #2274, part 11	N	Source Test	Y	

<sup>1</sup> Ground Level Concentration

**Title V Semi-Annual Monitoring Verification Report  
US Pipe and Foundry Company, Plant #A0083  
July 1 to December 31, 2019**

**Applicable Limits and Compliance Monitoring Requirements**

**Table VII-B  
S-4 Ductile Treating Station**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301 and SIP 6-301	Y		Ringelmann No.1 ≤ 3 minutes aggregated in any hour	BAAQMD Condition #1783, Part 3	C	pressure drop monitor	Y	
	BAAQMD 6-1-301 and SIP 6-301	Y		Ringelmann No.1 ≤ 3 minutes aggregated in any hour	BAAQMD Condition #1783, Part 6	P/W	preventative maintenance records	Y	
	BAAQMD 6-1-301 and SIP 6-301	Y		Ringelmann No.1 ≤ 3 minutes aggregated in any hour	BAAQMD Condition #1783, Part 7	P/W	Visible emission monitoring	Y	
PM	BAAQMD 6-1-305 and SIP 6-305	Y		Fallout of visible particles	BAAQMD Condition #1783, Part 3	C	Pressure drop monitor	Y	
FP	BAAQMD 6-1-310 and SIP 6-310	Y		0.15 gr/dscf	BAAQMD Condition #1783, Part 3	C	Pressure drop monitor	Y	
FP	BAAQMD 6-1-311 and SIP 6-311	Y		40 lb/hr	BAAQMD Condition #1783, Part 3	C	Pressure drop monitor	Y	
Lead	BAAQMD 11-1-301	Y		15 lb/day		N		Y	
	BAAQMD 11-1-302	Y		GLC <sup>1</sup> not to exceed 1.0 ug/m <sup>3</sup> averaged over 24 hrs		N		Y	
SO <sub>2</sub>	BAAQMD 9-1-301	Y		GLC <sup>1</sup> of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		Y	
	9-1-302	Y		sulfur emissions not to exceed 300 ppm, dry		N		Y	
SO <sub>2</sub>	BAAQMD Condition #1783, part 2	Y		150 lb/day		N		Y	

**Title V Semi-Annual Monitoring Verification Report  
US Pipe and Foundry Company, Plant #A0083  
July 1 to December 31, 2019**

**Applicable Limits and Compliance Monitoring Requirements  
Table VII-B  
S-4 Ductile Treating Station**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Baghouse Pressure Drop	BAAQMD Condition #1783, part 5	Y		Pressure drop across bags not to exceed 6 inches water column or to fall below 1/4 inch water column	BAAQMD Condition #1783, part 3	C	Pressure drop monitor	Y	

<sup>1</sup> Ground Level Concentration

**Title V Semi-Annual Monitoring Verification Report  
US Pipe and Foundry Company, Plant #A0083  
July 1 to December 31, 2019**

**Applicable Limits and Compliance Monitoring Requirements**

**Table VII-C  
S-5 Ladle Lancing**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301 and SIP 6-301	Y		Ringelmann No.1 ≤ 3 minutes aggregated in any hour	BAAQMD Condition #14989, Part 1	P/D	preventative maintenance records	Y	
	BAAQMD 6-1-301 and SIP 6-301	Y		Ringelmann No.1 ≤ 3 minutes aggregated in any hour	BAAQMD Condition #14989, Part 2	P/W	Visible emission monitoring	Y	
	BAAQMD 6-1-305 and SIP 6-305	Y		Fallout of visible particles		N		Y	
FP	BAAQMD 6-1-310 and SIP 6-310	Y		0.15 gr/dscf		N		Y	
	BAAQMD 6-1-311 and SIP 6-311	Y		40 lb/hr		N		Y	



**Title V Semi-Annual Monitoring Verification Report  
US Pipe and Foundry Company, Plant #A0083  
July 1 to December 31, 2019**

**Applicable Limits and Compliance Monitoring Requirements**

**Table VII-D  
S-8 Bell Blowout**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301 and SIP 6-301	Y		Ringelmann No.1 ≤ 3 minutes aggregated in any hour	BAAQMD Condition #2212, Part 3	C	pressure drop monitor	Y	
	BAAQMD 6-1-301 and SIP 6-301	Y		Ringelmann No.1 ≤ 3 minutes aggregated in any hour	BAAQMD Condition #2212, Part 4	P/W	Visible emission monitoring	Y	
PM	BAAQMD 6-1-305 and SIP 6-305	Y		Fallout of visible particles	BAAQMD Condition #2212, Part 3	C	pressure drop monitor	Y	
FP	BAAQMD 6-1-310 and SIP 6-310	Y		0.15 gr/dscf	BAAQMD Condition #2212, Part 3	C	pressure drop monitor	Y	
	BAAQMD 6-1-311 and SIP 6-311	Y		40 lb/hr	BAAQMD Condition #2212, Part 3	C	pressure drop monitor	Y	
Baghouse Pressure Drop	BAAQMD Condition #2212, part 2	Y		Pressure drop across bags not to exceed 6 inches water column or to fall below 1/4 inch water column	BAAQMD Condition #2212, part 3	C	Pressure drop monitor	Y	

**Title V Semi-Annual Monitoring Verification Report  
US Pipe and Foundry Company, Plant #A0083  
July 1 to December 31, 2019**

**Applicable Limits and Compliance Monitoring Requirements**

**Table VII-E  
S-15 Annealing Oven**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301 and SIP 6-301	Y		Ringelmann No.1 ≤ 3 minutes aggregated in any hour	BAAQMD Condition #14990, Part 1	P/M	Visible emission monitoring	Y	
PM	BAAQMD 6-1-305 and SIP 6-305	Y		Fallout of visible particles		N		Y	
FP	BAAQMD 6-1-310 and SIP 6-310	Y		0.15 gr/dscf		N		Y	
FP	BAAQMD 6-1-311 and SIP 6-311	Y		40 lb/hr		N		Y	
SO <sub>2</sub>	BAAQMD 9-1-301	Y		GLC <sup>1</sup> of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		Y	
	BAAQMD 9-1-302	Y		sulfur emissions not to exceed 300 ppm, dry		N		Y	

<sup>1</sup> Ground Level Concentration

**Title V Semi-Annual Monitoring Verification Report  
US Pipe and Foundry Company, Plant #A0083  
July 1 to December 31, 2019**

**Applicable Limits and Compliance Monitoring Requirements**

**Table VII-F  
S-16 Pneumatic Cement Transport System**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301 and SIP 6-301	Y		Ringelmann No.1 ≤ 3 minutes aggregated in any hour	BAAQMD Condition #14991, Part 1	P/M	Visible emission monitoring	Y	
PM	BAAQMD 6-1-305 and SIP 6-305	Y		Fallout of visible particles		N		Y	
FP	BAAQMD 6-1-310 and SIP 6-310	Y		0.15 gr/dscf		N		Y	
	BAAQMD 6-1-311 and SIP 6-311	Y		40 lb/hr		N		Y	

**Title V Semi-Annual Monitoring Verification Report  
US Pipe and Foundry Company, Plant #A0083  
July 1 to December 31, 2019**

**Applicable Limits and Compliance Monitoring Requirements**

**Table VII-G  
S-17 Surface Coater**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
VOC	BAAQMD 8-19-302.2	Y		VOC limit of 2.8 lb/gal	BAAQMD 8-19-501	P/W	coating records	Y	
	BAAQMD Condition #20671, part 1	Y		Coating usage limit of 156,000 gallons per year; solvent usage limit of 5,200 gallons per year	BAAQMD Condition #20671, part 3	P	Coating and solvent usage records	Y	
	BAAQMD Condition #20671, part 2	Y		Alternative coating/solvent mass emission limit of 94.9 tons per year	BAAQMD Condition #20671, part 3	P	Coating and solvent usage records	Y	

**Title V Semi-Annual Monitoring Verification Report  
US Pipe and Foundry Company, Plant #A0083  
July 1 to December 31, 2019**

**Applicable Limits and Compliance Monitoring Requirements**

**Table VII-H  
S-33 Gasoline Dispensing Facility (Non-Retail)**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
POC	BAAQMD 8-7-301.10	N		minimum vapor recovery efficiency of lesser of 98% or CARB-certified efficiency for new or modified systems	BAAQMD Condition #18432, part 2	P/A	Source Test	Y	
	BAAQMD Regulation 8-7-313.1	N		Fugitives ≤ 0.42 lb/1000 gallon		N		Y	
	BAAQMD Regulation 8-7-313.2	N		Spillage ≤ 0.42 lb/1000 gallon		N		Y	
	BAAQMD Regulation 8-7-313.3	N		Liquid Retain + Spitting ≤ 0.42 lb/1000 gallon		N		Y	
	None	N		None	BAAQMD Regulation 8-7-503	P/M	Records	Y	
	SIP Regulation 8-7-301.2	Y		95% recovery of gasoline vapors		N		Y	
Gasoline throughput	BAAQMD condition #18432, part 1	Y		940,000 gallons per year	BAAQMD Regulation 8-7-503	P	Records	Y	

**Title V Semi-Annual Monitoring Verification Report  
US Pipe and Foundry Company, Plant #A0083  
July 1 to December 31, 2019**

**Applicable Limits and Compliance Monitoring Requirements**

**Table VII-I  
S-40 Portable Abrasive Blasting Unit #1**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 12-4-301	Y		Ringelmann No. 1 Limitation		N		Y	
	BAAQMD 12-4-302	Y		Ringelmann No. 2 Limitation		N		Y	
Usage	BAAQMD Condition 13321, part 1	Y		12 tons per 12-month period or 243 lbs per calendar day	BAAQMD Condition 13321, part 3	P/D	records	Y	

**Table VII-J  
S-41 Portable Abrasive Blasting Unit #2**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 12-4-301	Y		Ringelmann No. 1 Limitation		N		N/A*	
	BAAQMD 12-4-302	Y		Ringelmann No. 2 Limitation		N		N/A*	
Usage	BAAQMD Condition 13321, part 4	Y		1.5 tons per 12-month period or 1000 lbs per calendar day	BAAQMD Condition 13321, part 6	P/D	records	N/A*	

\* Note: S-41 Portable Abrasive Blasting Unit #2 has not been used during this reporting period.

**Title V Semi-Annual Monitoring Verification Report  
US Pipe and Foundry Company, Plant #A0083  
July 1 to December 31, 2019**

**Applicable Limits and Compliance Monitoring Requirements**

**Table VII-K  
S-42 Cold Cleaner #2  
S-43 Cold Cleaner #3**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
POC	BAAQMD Condition #16938, part 2(a)	Y		101 pounds per year	BAAQMD Condition #16938, part 3	P	Usage Records	Y*	
NPOC	BAAQMD Condition #16938, part 2(b)	Y		0 pounds per year	BAAQMD Condition #16938, part 3	P	Usage Records	Y*	

\* Note: Only S-43 Cold Cleaner has been used during this reporting period.

**Title V Semi-Annual Monitoring Verification Report  
US Pipe and Foundry Company, Plant #A0083  
July 1 to December 31, 2019**

**Applicable Limits and Compliance Monitoring Requirements**

**Table VII - L  
S-52 STANDBY GENERATOR DIESEL ENGINE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-303.1 and SIP 6-303	Y		Ringelmann No.2 ≤ 3 minutes aggregated in any hour		N		N/A*	
FP	BAAQMD 6-1-310 and SIP 6-310	Y		0.15 grain/dscf		N		N/A*	
	BAAQMD 6-1-310 and SIP 6-310	Y		0.15 grain/dscf @ 6% O <sub>2</sub>		N		N/A*	
SO <sub>2</sub>	BAAQMD 9-1-301	Y		GLC <sup>1</sup> of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours	BAAQMD Condition #20974, part 1	P/M	Fuel Certification Records	N/A*	
	BAAQMD 9-1-304	Y		sulfur emissions not to exceed 300 ppm, dry	BAAQMD Condition #20974 part 1	P/M	Fuel Certification Records	N/A*	
Operating hours	BAAQMD 9-8-330	Y		100 hours of reliability-related operation per calendar year until 1/1/12  50 hours of reliability-related operation per calendar year as of 1/1/12	BAAQMD Regulation 9-8-530	P/M	Records of operation	N/A*	

\* Note: S-52 Emergency Generator has not been used during this reporting period.



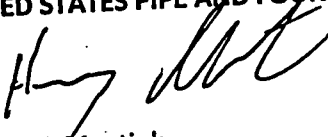
Mr. Doug McDaniel  
January 27, 2020  
Page 2

- **Opacity Testing.** *This facility complies with the fugitive emissions from buildings or structure housing any iron and steel foundry emissions sources subject to opacity limit in section 63.10895(e) for the building housing its Cupola melting furnace.*

Based upon information and belief formed after reasonable inquiry, I certify that the statements above are true, accurate, and complete.

If you have questions, please contact Mr. Dioni Araza at 510-441-5865.

Sincerely,  
**UNITED STATES PIPE AND FOUNDRY COMPANY, LLC**

  
Henry W. Mentink  
Plant Manager

✓ Cc: Mr. Wayne Kino – Compliance Director, Bay Area Air Quality Management District

**MORE  
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**UNITED STATES PIPE AND FOUNDRY COMPANY, LLC**

1295 WHIPPLE ROAD  
UNION CITY, CALIFORNIA 94587  
(510) 441-5810

January 27, 2020

Mr. Doug McDaniel  
U.S. EPA Region 9  
75 Hawthorne Street  
San Francisco, CA, 94105

**Subject: Semi-Annual Monitoring Report, 40 CFR 63, Subpart ZZZZZ  
U. S. Pipe and Foundry Company, Union City Pipe Plant, Facility A0083**

Dear Mr. McDaniel:

United States Pipe and Foundry Company, LLC, Union City Pipe Plant, is required to submit a semi-annual report pursuant to Title 40 of the Code of Federal Regulations, Part 63, Section 63.10899 (c) of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries Area Sources. The following summary is provided for the Semi-Annual Compliance Report for the reporting period July 1 through December 31, 2019:

- **Management Practices for Metallic Scrap.** *This facility has prepared and operated by written materials specifications for metallic scrap according to section 63.10885;*
- **Management Practices for Binder Formulation.** *This facility has not owned or operated a furfuryl alcohol warm box mold or core making line, therefore the no methanol requirement for the catalyst portion of each binder chemical formulation according to section 63.10866 does not apply;*
- **Management Practices for Mercury Scrap.** *This facility has participated in and purchased motor vehicles scrap only from scrap providers who participate in a program for removal of mercury switches that has been approved by the EPA Administrator according to section 63.10885(b)(2)(i) through 63.10885(b)(2)(iii);*
- **Operation of a Capture and Collection System (Cupola Baghouse).** *This facility has operated a capture and collection system for the Cupola subject to this subpart according to section 63.10895(b);*
- **Operation and Maintenance Plan for the Control Device (Cupola Baghouse).** *This facility has prepared and operated by an operation and maintenance plan according to section 63.10896(a).*
- **Performance Test Requirements.** *This facility complies with the PM or total metal HAP emissions limit in section 63.10895(c)(1) for its Cupola melting furnace.*