UNITED STATES PIPE AND FOUNDRY COMPANY, LLC
1295 Whipple Road
Union City, California 94587
(510) 441-5810

January 15, 2026

TV Tracking #1269 (Semi-Annual)

1. ☐ RECEIVED IN ENFORCEMENT: 01/15/2026

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 (U.S. Pipe), 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 Advisory, dated December 5, 1997, the following summary is provided for the reporting period from **July 1, 2025 through December 31, 2025.**

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 A13 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

Rex Carpenter
Plant Manager

cc: Jake Wilcox, U.S. Pipe, Environmental Manager
Scot Aler, U.S. Pipe, AVP Environmental Services

Title V Semi-Annual Monitoring Verification Report
US Pipe and Foundry Company, Plant #A0083
July 1, 2025, through December 31, 2025
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[1]	Y		Ringelmann No.1 ≤ 3 minutes aggregated in any hour	BAAQMD Condition #2274, Part 8	P/Daily	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	
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	

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Table VII-A
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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
SO_2	BAAQMD 9-1-301	Y		GLC[1] 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 SO2≤300ppmd	BAAQMD condition #2274, part 7	P/E	Fuel certification. Source test when coke sulfur exceeds 0.75%	Y	
SO2	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	
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[1] not to exceed 1.0 ug/m^3 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	

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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
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		1550 F	BAAQMD Condition 2274, part 5	C	Continuous Temperature monitor/recorder	Y	
Afterburner Temperature limit (Off-Blast)	BAAQMD Condition #2274, part 3	Y		≥700 F	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	

[1] Ground Level Concentration

Title V Semi-Annual Monitoring Verification Report
US Pipe and Foundry Company, Plant #A0083
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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[1] not to exceed 1.0 ug/m^3 averaged over 24 hrs		N		Y	
SO_2	BAAQMD 9-1-301	Y		GLC[1] 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	
SO2	BAAQMD Condition #1783, part 2	Y		150 lb/day		N		Y	
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	

[1] Ground Level Concentration

Title V Semi-Annual Monitoring Verification Report
US Pipe and Foundry Company, Plant #A0083
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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	

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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
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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 $\leq$ 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_2	BAAQMD 9-1-301	Y		GLC[1] 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	

[1] Ground Level Concentration

Title V Semi-Annual Monitoring Verification Report
US Pipe and Foundry Company, Plant #A0083
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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
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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
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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
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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
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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
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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% O2		N		N/A*	
SO2	BAAQMD 9-1-301	Y		GLC[1] 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 and has been disconnected from our electrical system. US Pipe has requested that this source be removed from our permit.**