



UNITED STATES PIPE AND FOUNDRY COMPANY, LLC

1295 Whipple Road
Union City, California 94587
(510) 441-5810

RECEIVED

2023 AUG -1 PM 12: 58

BAY AREA AIR QUALITY
MANAGEMENT DISTRICT



July 28, 2023

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

TV Tracking #: 785

1. RECEIVED IN
ENFORCEMENT: 08/01/2023

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 Advisory, dated December 5, 1997, the following summary is provided for the reporting period from **January 1st through June 30th 2023.**

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

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
January 1 to June 30, 2023
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
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

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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 | |

Title V Semi-Annual Monitoring Verification Report
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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 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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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
January 1 to June 30, 2023
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
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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.