

**MORE
THAN
JUST
PIPE.**



UNITED STATES PIPE AND FOUNDRY COMPANY, LLC

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

July 29, 2019

1. RECEIVED IN
ENFORCEMENT: 7/31/19
727/RP

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 **January 1 through June 30, 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 blue ink, appearing to read "H. Mentink", written over a white background.

Henry W. Mentink
Plant Manager

cc: D.M. Araza, Environmental Engineer

Title V Semi-Annual Monitoring Verification Report
US Pipe and Foundry Company, Plant #A0083
January 1 to June 30, 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 ¹ | 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
January 1 to June 30, 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 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 SO ₂ ≤ 300ppmd | BAAQMD condition #2274, part 7 | P/E | Fuel certification; Source test when coke sulfur exceeds 0.75% | Y | |
| SO ₂ | 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
January 1 to June 30, 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 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 | |
| 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
January 1 to June 30, 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 | |

¹ Ground Level Concentration

Title V Semi-Annual Monitoring Verification Report
US Pipe and Foundry Company, Plant #A0083
January 1 to June 30, 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 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 | |
| SO ₂ | 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
January 1 to June 30, 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 | |

¹ Ground Level Concentration

**Title V Semi-Annual Monitoring Verification Report
US Pipe and Foundry Company, Plant #A0083
January 1 to June 30, 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 \leq 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 \leq 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
January 1 to June 30, 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 \leq 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 \leq 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
January 1 to June 30, 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 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
January 1 to June 30, 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
January 1 to June 30, 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
January 1 to June 30, 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
January 1 to June 30, 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
January 1 to June 30, 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
January 1 to June 30, 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% 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.

MORE
THAN
JUST
PIPE.



UNITED STATES PIPE AND FOUNDRY COMPANY, LLC

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

July 29, 2019

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 **January 1 through June 30, 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.*

- **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