Emissions Minimization Plan

Regulation 12, Miscellaneous Standards of Performance, Rule 13
Foundry and Forging Operations

USS-UPI, LLC
District Site #2371
900 Loveridge Road
Pittsburg, CA 94565
January 11, 2022

☒ Public Copy
☐ Confidential Copy

Table of Contents

Responsible Manager Certification
12-13-404.1

I, as the Responsible Manager of this facility, hereby certify that as of this date, this Emissions Minimization Plan contains all elements and information required of a complete EMP pursuant to District Regulation Section 12-13-403 and that the information contained in this EMP is accurate.

Certified by: _____ *Dated:* 6/20/22

Lynnette Giacobazzi, Interim Director of Environmental Affairs

Responsible Manager

Designation of Confidential Business Information

Describe the information you designate as “CONFIDENTIAL” that is trade secret or otherwise exempt under law from public disclosure. Specify what is “CONFIDENTIAL” and include specific section(s) and corresponding page number(s).

Name of Section / Page Number(s)	Description of Confidential Information

Company Description

USS-UPI, LLC (UPI) is a wholly-owned subsidiary of United States Steel Corporation that operates a steel finishing plant in Pittsburg, California.

UPI receives hot-rolled steel coils by ship and/or rail and converts them into the following steel products: hot-rolled pickled & oiled sheet; cold-rolled sheet; galvanized sheet; tinplate; tin-free steel; and tin-mill blackplate. UPI's production processes include pickling, cold rolling,cleaning, annealing, hot-dip galvanizing, temper rolling, side-trimming, and electrolytic tin and Cr/CrO coating.

Company Organizational Chart and Schedule of Management Operators
12-13-403.1.3

A. *Company Organizational Chart-* Attach a copy of the organizational chart of the company, which describes the business structure and includes the name of the facility's Responsible Official. Label the attachment with the corresponding Attachment #.

Attachment # A

B. *Schedule of Management Operators* - Provide the names and contact information of the Onsite Responsible Manager(s) and Onsite Alternate Contact(s) and their duty schedule.

Onsite Responsible Manager(s)

Name: Lynnette Giacobazzi
Title: Interim Director of Environmental Affairs
Phone: 925-439-6614
Email: lgiacobazzi@ussposco.com
Schedule/Shift: M-F, 7am-4pm

Name:
Title:
Phone:
Email:
Schedule/Shift:

Onsite Alternate Contact(s)

Name: Tyler Lee
Title: Environmental Compliance Manager
Phone: (925) 439-6433
Email: tylerlee@ussposco.com
Schedule/Shift: M-F, 7am-4pm

Name: Paige Alford
Title: Environmental Compliance Engineer II
Phone: (925)439-6029
Email: PaigeAlford@ussposco.com
Schedule/Shift: M-F, 8am-430pm

Contents of the EMP

12-13-403

The owner or operator of the foundry or forge subject to Section 12-13-401 shall prepare a complete and accurate EMP that details the management practices, measures, equipment and procedures that are employed or scheduled to be implemented to minimize fugitive emissions of particulate matter and odorous substances for the operations subject to the EMP.

A. Operations Subject to EMP and Schedule of Operations

B. Description of Operations - Facilities with operations under 12-13-402 must list and provide description of all process equipment, material usages, abatement and control equipment and monitoring parameters to reduce fugitive emissions of particulates and odors. Please provide information for all the following operations that apply.

C. Management Practices to Reduce Fugitive Emissions- Facilities with operations under 12-13-402 must list and provide descriptions of all preventative maintenance activities, pollution prevention and source reduction measures to reduce fugitive emissions of particulates and odors. Provide schedules of activities conducted.

D. Description of Abatement and Control Equipment- Facilities must provide a comprehensive list of all abatement and control equipment for operations subject to 12-13-402 and name the source(s) of operation it abates.

A. Operations Subject to EMP and Schedule of Operations

The EMP shall address all of the following operations that are conducted at a foundry or forge per 12-13-402.

Please check all facility operations that apply and provide the schedule of operation.

Operation		Schedule of Operations
☐ 402.1	Mold and Core Making Operations	
☒ 402.2	Metal Management	Up to 24 hours a day, 7 days a week. Permitted to run 8640 hours per year per production line.
☐ 402.3	Furnace Operations, including tapping and pouring	
☒ 402.4	Forging Operations	Up to 24 hours a day, 7 days a week. Permitted to run 8640 hours per year per production line.
☐ 402.5	Casting and Cooling Operation	
☐ 402.6	Shake Out Operations	
☐ 402.7	Finishing Operations	
☐ 402.8	Sand Reclamation	
☐ 402.9	Dross and Slag Management	

402.1 Mold and Core Making Operations

B. Description of Operations - MOLD AND CORE MAKING OPERATIONS														
Section #	Equipment Name and Manufacturer /Model #	District S# and Applicable NESHAPs Section	NAME OF MATERIALS USED IN MOLDING OPERATIONS					ABATEMENT					
			Binders	Coatings	Adhesives	Mold Release Agents	Other	Source Abated	Abatement Required by Permit	A#	Type of Abatement and Purpose of Abatement	Abatement Monitored	Monitoring Parameters
								☐ Yes ☐ No	☐ Yes ☐ No			☐ Yes ☐ No	
								☐ Yes ☐ No	☐ Yes ☐ No			☐ Yes ☐ No	
								☐ Yes ☐ No	☐ Yes ☐ No			☐ Yes ☐ No	
								☐ Yes ☐ No	☐ Yes ☐ No			☐ Yes ☐ No	
								☐ Yes ☐ No	☐ Yes ☐ No			☐ Yes ☐ No	
								☐ Yes ☐ No	☐ Yes ☐ No			☐ Yes ☐ No	
								☐ Yes ☐ No	☐ Yes ☐ No			☐ Yes ☐ No	

B. Description of Operations – MOLD AND CORE MAKING OPERATIONS

Provide information on binders used in mold and core making operations.

Section #	Name of Binder	Binder Mix Ratio	Name of Source(s) and/or District S# Where Binder Is Used	Product Specification per MSDS
				VOC CONTENT (%): PHENOL CONTENT (%):
				VOC CONTENT (%): PHENOL CONTENT (%):
				VOC CONTENT (%): PHENOL CONTENT (%):
				VOC CONTENT (%): PHENOL CONTENT (%):
				VOC CONTENT (%): PHENOL CONTENT (%):
				VOC CONTENT (%): PHENOL CONTENT (%):

C. Management Practices to Reduce Fugitive Emissions – MOLD AND CORE MAKING OPERATIONS

Provide description of preventative maintenance (PM) activities including PM schedules and work practice standards for each abatement device for core and mold making operations.

Section #	Name of Abatement Device and Manufacturer/Model #	Description of Preventative Maintenance Activity and Work Practice Standards	Schedule of PM

C. Management Practices to Reduce Fugitive Emissions – MOLD AND CORE MAKING OPERATIONS

Provide description of other housekeeping measures to abate and/or minimize fugitive emissions of odors and/or particulate matter at sources or source areas.

Section #	Description of Housekeeping Measure	Purpose of Activity	Schedule of Activity

402.2 Metal Management

B. Description of Operations - METAL MANAGEMENT			
Section #	**Name of Non-Exempt Metal or Metal Alloy Used for Production**	**Metal Type**	**Method of Verification for Determining Chemical Composition**
1	Carbon Steel	☒ Ferrous ☐ Non-Ferrous	Each coil is an ASTM verified grade that has specific chemical composition requirements. It then has an individual barcode that specifies the verified grade
		☐ Ferrous ☐ Non-Ferrous	
		☐ Ferrous ☐ Non-Ferrous	
		☐ Ferrous ☐ Non-Ferrous	
		☐ Ferrous ☐ Non-Ferrous	
		☐ Ferrous ☐ Non-Ferrous	
		☐ Ferrous ☐ Non-Ferrous	
		☐ Ferrous ☐ Non-Ferrous	
		☐ Ferrous ☐ Non-Ferrous	
		☐ Ferrous ☐ Non-Ferrous	

B. Description of Operations - METAL MANAGEMENT

Describe the facility's metal inspection program, work practice standards and material acquisition plan/procedures upon receipt of scrap or unprocessed metal. Include any pollution prevention management practices and source reduction measures to ensure the metal received is clean.

All coils are brought in by rail or ship and stored in the coil staging area by the dock. Each coil is an ASTM verified grade that has specific chemical composition requirements. They are not segragated, but are identifiable by barcodes. Each coil is equipped with an individula barcode that will follow the coil throughout the entire production process. The barcode identifies the coil including the initial ASTM grade, what process it has been ran through at what time and to what specifications, and what the final product intended is.

C. Management Practices to Reduce Fugitive Emissions – METAL MANAGEMENT

Describe control measures to minimize fugitive emissions from scrap or unprocessed metal.

Because the steel is in large coils, the only fugitive emissions from the coil are from the iron oxide that forms on the outside of the coil before it is processed. These emissions are captured by a baghouse (A26) at the beginning of the processing line at the Pickling Line Tandem Cold Mill (PLTCM). Any other coatings added to the coils are removed at the beginning of each process line in the cleaning section. All scrap is in large pieces with no fugitive emissions. It is stored in bins and shipped out by truck and rail.

402.3 Furnace Operations

B. Description of Operations - FURNACE OPERATIONS

Section #	Furnace Name and Manufacturer/ Model #	District S# and Applicable NESHAPs Section	Type of Operation	Source Abated	Type of Abatement Device	District A#	Purpose of Abatement	Abatement Monitored	Monitoring Parameters
			☐ Melting ☐ Heat Treating	☐ Yes ☐ No				☐ Yes ☐ No	
			☐ Melting ☐ Heat Treating	☐ Yes ☐ No				☐ Yes ☐ No	
			☐ Melting ☐ Heat Treating	☐ Yes ☐ No				☐ Yes ☐ No	
			☐ Melting ☐ Heat Treating	☐ Yes ☐ No				☐ Yes ☐ No	
			☐ Melting ☐ Heat Treating	☐ Yes ☐ No				☐ Yes ☐ No	
			☐ Melting ☐ Heat Treating	☐ Yes ☐ No				☐ Yes ☐ No	
			☐ Melting ☐ Heat Treating	☐ Yes ☐ No				☐ Yes ☐ No	
			☐ Melting ☐ Heat Treating	☐ Yes ☐ No				☐ Yes ☐ No	
			☐ Melting ☐ Heat Treating	☐ Yes ☐ No				☐ Yes ☐ No	
			☐ Melting ☐ Heat Treating	☐ Yes ☐ No				☐ Yes ☐ No	
			☐ Melting ☐ Heat Treating	☐ Yes ☐ No				☐ Yes ☐ No	
			☐ Melting ☐ Heat Treating	☐ Yes ☐ No				☐ Yes ☐ No	

C. Management Practices to Reduce Fugitive Emissions - FURNACE OPERATIONS

Provide description of preventative maintenance (PM) activities including PM schedules and work practice standards for each abatement device for furnace operations.

Section #	Abatement Device and Manufacturer/Model #	Description of Preventative Maintenance Activity and Work Practice Standards	Schedule of PM

C. Management Practices to Reduce Fugitive Emissions - FURNACE OPERATIONS

Provide description of other housekeeping measures to abate and/or minimize fugitive emissions of odors and/or particulate matter at sources or source areas.

Section #	Description of Housekeeping Measure	Purpose of Activity	Schedule of Activity

402.4 Forging Operations

B. Description of Operations - FORGING OPERATIONS										
Section #	**Equipment Name and Manufacturer/ Model #**	**District S# and Applicable NESHAPs Section**	**Description of Use**	**Name of Lubricants and/or Oils**	**Other Materials Used**	**Source Abated**	**Type of Abatement Device**	**Purpose of Abatement**	**Abatement Monitored**	**Monitoring Parameters**
1	Continuous Annealing Line ; custom	43	Annealing	n/a	n/a	☐ Yes ☒ No			☐ Yes ☐ No	
2	#2 Continuous Galvanizing Line; custom	70	Annealing	n/a	n/a	☐ Yes ☒ No			☐ Yes ☐ No	
3	Kawasaki Multipurpose Continuous Annealing Line; Custom	174	Annealing	n/a	n/a	☒ Yes ☐ No	Selective Catalytic Reduction (SCR)	NOx reduction	☒ Yes ☐ No	a. Not exceed 10 ppmv at 3% oxygen, averaged over 3 consecutive hours; b. Be reduced by at least a 90%, by weight, averaged over 3 consecutive hours, by the SCR Unit; c. For a period when UPI is running at a heat input less than 50 kscf/hr, NOx shall be reduced by at least 82%, by weight, averaged over three consecutive hours, by the SCR Unit. If the duration of the low heat input run is less than three hours, the averaging period shall be the entire run period. d. For a period when UPI is running a heat input level less than 50 kscf/hr, NOx shall not exceed 18 ppmv at 3% oxygen averaged over 3 consecutive hours. If the duration of the low heat input run is less than three hours, the averaging period shall be the entire run.
						☐ Yes ☐ No			☐ Yes ☐ No	
						☐ Yes ☐ No			☐ Yes ☐ No	
						☐ Yes ☐ No			☐ Yes ☐ No	

						☐ Yes ☐ No			☐ Yes ☐ No	
						☐ Yes ☐ No			☐ Yes ☐ No	
						☐ Yes ☐ No			☐ Yes ☐ No	
						☐ Yes ☐ No			☐ Yes ☐ No	
						☐ Yes ☐ No			☐ Yes ☐ No	

C. Management Practices to Reduce Fugitive Emissions - FORGING OPERATIONS

Provide description of preventative maintenance (PM) activities including PM schedules and work practice standards for each abatement device for forging operations.

Section #	Abatement Device and Manufacturer/Model #	Description of Preventative Maintenance Activity and Work Practice Standards	Schedule of PM
1	A32 Selective Catalytic Reduction Unit (SCR)	-Calibration cross checks -Replacement of DeNOx sample pump diaphragms -Replacement of DeNOx chamber pump diaphragms -Replacement of oxygen analyzer fuel cell	-Daily -On demand -On demand -Every 6 month

C. Management Practices to Reduce Fugitive Emissions - FORGING OPERATIONS

Provide description of other housekeeping measures to abate and/or minimize fugitive emissions of odors and/or particulate matter at sources or source areas.

Section #	Description of Housekeeping Measure	Purpose of Activity	Schedule of Activity
1	Checking gas consumptions	The hydrogen-nitrogen gas (HN) usage and Natural Gas flow are moniored daily to ensure there isn't an abnormal amount of gases being used. If there was a leak or fugitive emissions, the gas consumption would increase	Daily
2	Set Combustion	Combustion is set annually to ensure the appropriate ratio of air to fuel intake. With proper combustion, the production of carbon monoxide, smoke, and NOx are minimized.	Annually
3	Regular Maintenance a. Check conditions of the heat section b. Performs furnace walk-through c. Performs furnace inspection d. Perform HN (radiant tube) leak test	All burners and furnace equipment are maintained regularly to ensure they are in optimal operating conditions with no damage or leaks	a: Every start-up b. Every shift (3 times per day) c. Quarterly d. Every 6 months

402.5 Casting and Cooling Operations

B. Description of Operations - CASTING AND COOLING OPERATIONS									
Section #	Name of Pouring and Cooling Operations and Manufacturer/ Model #	District S# and Applicable NESHAPs Section	Cooling Time of Product or Source	Designated Locations of Cooling Operation	Source Abated	Type of Abatement Device	Purpose of Abatement	Abatement Monitored	Monitoring Parameters
					☐ Yes ☐ No			☐ Yes ☐ No	
					☐ Yes ☐ No			☐ Yes ☐ No	
					☐ Yes ☐ No			☐ Yes ☐ No	
					☐ Yes ☐ No			☐ Yes ☐ No	
					☐ Yes ☐ No			☐ Yes ☐ No	

C. Management Practices to Reduce Fugitive Emissions - CASTING AND COOLING OPERATIONS

Describe the method to verify adequate cooling times are achieved to ensure minimization of fugitive emissions of particulates and odors prior to commencing shake out operations.

C. Management Practices to Reduce Fugitive Emissions - CASTING AND COOLING OPERATIONS

Provide description of preventative maintenance (PM) activities including PM schedules and work practice standards for each abatement device for casting and cooling operations.

Section #	Abatement Device and Manufacturer/Model #	Description of Preventative Maintenance Activity and Work Practice Standards	Schedule of PM

C. Management Practices to Reduce Fugitive Emissions - CASTING AND COOLING OPERATIONS

Provide description of other housekeeping measures to abate and/or minimize fugitive emissions of odors and/or particulate matter at sources or source areas.

Section #	Description of Housekeeping Measure	Purpose of Activity	Schedule of Activity

402.6 Shake Out Operations

B. Description of Operations - SHAKE OUT OPERATIONS									
Section #	Name of Shakeout Operations and Manufacturer/ Model #	District S# and Applicable NESHAPs Section	Describe Location of Shake Out Operation	Source Abated	A#	Type of Abatement Device	Purpose of Abatement	Abatement Monitored	Monitoring Parameters
				☐ Yes ☐ No				☐ Yes ☐ No	
				☐ Yes ☐ No				☐ Yes ☐ No	
				☐ Yes ☐ No				☐ Yes ☐ No	
				☐ Yes ☐ No				☐ Yes ☐ No	
				☐ Yes ☐ No				☐ Yes ☐ No	

C. Management Practices to Reduce Fugitive Emissions - SHAKE OUT OPERATIONS

Provide description of preventative maintenance (PM) activities including PM schedules and work practice standards for each abatement device for shake out operations.

Section #	Abatement Device and Manufacturer/Model #	Description of Preventative Maintenance Activity and Work Practice Standards	Schedule of PM

C. Management Practices to Reduce Fugitive Emissions - SHAKE OUT OPERATIONS

Provide description of other housekeeping measures to abate and/or minimize fugitive emissions of odors and/or particulate matter at sources or source areas.

Section #	Description of Housekeeping Measure	Purpose of Activity	Schedule of Activity

402.7 Finishing Operations

B. Description of Operations - FINISHING OPERATIONS										
Section #	Type of Operation	District S# and Applicable NESHAPs Section	Describe Location of Finishing Operation	Number of Machines	Abated Source	A#	Type of Abatement Device	Purpose of Abatement	Abatement Monitored	Monitoring Parameters
	☐ Grinding ☐ Welding ☐ Other:			GRINDERS: WELDERS: OTHER:	☐ Yes ☐ No				☐ Yes ☐ No	
	☐ Grinding ☐ Welding ☐ Other:			GRINDERS: WELDERS: OTHER:	☐ Yes ☐ No				☐ Yes ☐ No	
	☐ Grinding ☐ Welding ☐ Other:			GRINDERS: WELDERS: OTHER:	☐ Yes ☐ No				☐ Yes ☐ No	
	☐ Grinding ☐ Welding ☐ Other:			GRINDERS: WELDERS: OTHER:	☐ Yes ☐ No				☐ Yes ☐ No	
	☐ Grinding ☐ Welding ☐ Other:			GRINDERS: WELDERS: OTHER:	☐ Yes ☐ No				☐ Yes ☐ No	
	☐ Grinding ☐ Welding ☐ Other:			GRINDERS: WELDERS: OTHER:	☐ Yes ☐ No				☐ Yes ☐ No	
	☐ Grinding ☐ Welding ☐ Other:			GRINDERS: WELDERS: OTHER:	☐ Yes ☐ No				☐ Yes ☐ No	
	☐ Grinding ☐ Welding ☐ Other:			GRINDERS: WELDERS: OTHER:	☐ Yes ☐ No				☐ Yes ☐ No	

C. Management Practices to Reduce Fugitive Emissions - FINISHING OPERATIONS

Provide description of preventative maintenance (PM) activities including PM schedules and work practice standards for each abatement device for finishing operations.

Section #	Abatement Device and Manufacturer/Model #	Description of Preventative Maintenance Activity and Work Practice Standards	Schedule of PM

C. Management Practices to Reduce Fugitive Emissions - FINISHING OPERATIONS

Provide description of other housekeeping measures to abate and/or minimize fugitive emissions of odors and/or particulate matter at sources or source areas.

Section #	Description of Housekeeping Measure	Purpose of Activity	Schedule of Activity

402.7 Sand Reclamation

B. Description of Operations - SAND RECLAMATION									
Section #	**Name of Sand Reclamation Equipment and Manufacturer/Model #**	**District S# and Applicable NESHAPs Section**	**Describe Type of Sand Reclamation Equipment**	**Abated Source**	**A#**	**Type of Abatement Device**	**Purpose of Abatement**	**Abatement Monitored**	**Monitoring Parameters**
				☐ Yes ☐ No				☐ Yes ☐ No	
				☐ Yes ☐ No				☐ Yes ☐ No	
				☐ Yes ☐ No				☐ Yes ☐ No	
				☐ Yes ☐ No				☐ Yes ☐ No	
				☐ Yes ☐ No				☐ Yes ☐ No	
				☐ Yes ☐ No				☐ Yes ☐ No	
				☐ Yes ☐ No				☐ Yes ☐ No	
				☐ Yes ☐ No				☐ Yes ☐ No	
				☐ Yes ☐ No				☐ Yes ☐ No	
				☐ Yes ☐ No				☐ Yes ☐ No	

C. Management Practices to Reduce Fugitive Emissions - SAND RECLAMATION

Provide description of preventative maintenance (PM) activities including PM schedules and work practice standards for each abatement device for sand reclamation operations.

Section #	Abatement Device and Manufacturer/Model #	Description of Preventative Maintenance Activity and Work Practice Standards	Schedule of PM

C. Management Practices to Reduce Fugitive Emissions - SAND RECLAMATION

Provide description of other housekeeping measures to abate and/or minimize fugitive emissions of odors and/or particulate matter at sources or source areas.

Section #	Description of Housekeeping Measure	Purpose of Activity	Schedule of Activity

402.9 Dross and Slag Management

B. Description of Operations - DROSS AND SLAG MANAGEMENT									
Section #	**Material**	**Describe Location for Cooling of Material**	**Abated Source**	**A#**	**Type of Abatement Device**	**Purpose of Abatement**	**Abatement Monitored**	**Monitoring Parameters**	**Material Disposition**
1	Dross		☐ Yes ☐ No				☐ Yes ☐ No		☐ Offsite Recycling ☐ Offsite Disposal ☐ Onsite Reprocessing
2	Slag		☐ Yes ☐ No				☐ Yes ☐ No		☐ Offsite Recycling ☐ Offsite Disposal ☐ Onsite Reprocessing

C. Management Practices to Reduce Fugitive Emissions - DROSS AND SLAG MANAGEMENT

Provide description of preventative maintenance (PM) activities including PM schedules and work practice standards for each abatement device for dross and slag operations.

Section #	Abatement Device and Manufacturer/ Model #	Description of Preventative Maintenance Activity and Work Practice Standards	Schedule of PM

C. Management Practices to Reduce Fugitive Emissions - DROSS AND SLAG MANAGEMENT

Provide description of other housekeeping measures to abate and/or minimize fugitive emissions of odors and/or particulate matter at sources or source areas.

Section #	Description of Housekeeping Measure	Purpose of Activity	Schedule of Activity

D. Description of Abatement and Control Equipment

Provide a comprehensive list of all abatement and control equipment for operations subject to 12-13-402 and identify the source(s) of operation in which it abates. If the abatement equipment abates multiple sources, provide a detailed description of how the abatement is designated to those sources.

Section #	Name of Abatement Equipment	District A#	Names of Source(s) Abated	District S#	Description of Abatement
1	Selective Catalytic Reduction Unit (SCR)	32	Kawasaki Multipurpose Continuous Annealing Line; Custom	174	NOx Catalytic Reduction Unit
2	Pickling Line Baghouse	26	Pickling Line Coil Processor, Butt Welder, and Stretch Leveler	166,167 and 168	Captures particulates

Technical Data
12-13-403.1

A. *Process Flow Diagram* – Facilities must indicate all operations in Section 12-13-402, the flow of materials used and identify all monitoring of processes, abatement and controls to minimize emissions beginning from material receipt to achievement of final product. Identify all abatement and control devices by District source numbers according to District Permit or as exempt from District Permit. Label the attachment with the corresponding Attachment #.

Attachment # B

B. *Facility Layout / Floor Plan* - Facilities must indicate all relative locations of processing equipment and monitoring and controls, all permitted and exempt sources identified in the process flow diagram per Section 12-13-403.1.1 and any other source(s) that may contribute to particulates and odors. Include all building walls, partitions, doors, windows, vents and openings and indicate all areas that have abatement for particulates and odors. Identify all metal melting and processing equipment by District source numbers according to District Permit or as exempt from District Permit. Label the attachment with the corresponding Attachment #.

Attachment # C

Five-Year Review of the EMP: Schedule for Implementation of the EMP Elements and Fugitive Emissions Reductions 12-13-410

A. Provide a list of existing or current EMP elements in place during the 5-year review period (March 1, 2016 – February 28, 2021). Include a list of equipment, processes and procedures installed or implemented to reduce fugitive emissions and indicate the permit status if applicable. Specify the purpose for implementation and detail any employee training that was conducted. Any associated training materials shall be made available for Air District review upon request.

B. Provide a list of new or future EMP elements to be implemented following APCO approval of the EMP. Include a description, the purpose and schedule of the element(s) to be implemented.

A. 12-13-410 SCHEDULE FOR IMPLEMENTATION OF THE EMP ELEMENTS AND FUGITIVE EMISSIONS REDUCTIONS REALIZED WITHIN THE LAST 5 YEARS (MARCH 1, 2016 – FEBRUARY 28, 2021)							
Section #	**Identify Type of Operation per Section 12-13-402**	**Description of Equipment, Processes or Procedures Implemented Between March 1, 2016 and February 28, 2021**	**Permit Status**		**Implementation Date**	**Purpose of Implementation**	**Description of Employee Training**
402.2	Metal Management	Limited the operating hours to less than 200 hours per year for 7 pieces of old diesel off-road equipment which were equipped with Tier 0 engines and used for material handling and transportion around the plant	☐ A/C ☐ P/O ☒ N/A	Application # (if applicable):	2018	Reduce diesel emissions	NA
402.2	Metal Management	Retired a forklift equipped with a Tier 0 engine	☐ A/C ☐ P/O ☒ N/A	Application # (if applicable):	2019	Reduce diesel emissions	NA
402.2	Metal Management	1) Retired 3 pieces of old diesel off-road equipment with Tier 0 engines; 2) Replaced a tractor with Tier 0 engine with a new tractor with Tier 4 final engine; 3) Leased a forklift with Tier 4i engine; and 4) Repowered a flatbed truck to replace its Tier 0 engine with a Tier 4 final engine	☐ A/C ☐ P/O ☒ N/A	Application # (if applicable):	2020	Reduce diesel emissions	NA
402.2	Metal Management	1) Repowered a flatbed truck to replace its Tier 0 engine with a Tier 4 final engine; 2) Leased a new backhoe and two forklifts with Tier 4 final engines; and 3) Bought a new tractor with Tier 4 final engine, and limited the opeating hour to less than 200 hours per year for an old tractor with Tier 0 engine	☐ A/C ☐ P/O ☒ N/A	Application # (if applicable):	2021	Reduce diesel emissions	NA
402.4	Forging Operations	Customized the data shown in the remote viewing software for the furnace at Kawasaki Multipurpose Continuous Annealing Line. Upgrades included: automated email notification system, timer for tracking startup period, system performance trending, etc.	☐ A/C ☐ P/O ☒ N/A	Application # (if applicable):	2021	For better monitoring of emissions and system performance	Operators were trained on the startup procedure. The air compliance engineer was trained on data access using the remote viewing software
			☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):			
			☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):			

			☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):			
			☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):			

B. 12-13-410 NEW OR FUTURE EMP ELEMENTS TO BE IMPLEMENTED					
Section #	**Identify Type of Operation per Section 12-13-402**	**List Specific Elements to be Implemented Following APCO Approval of the Updated EMP**	**Projected Implementation Date**	**Description of Elements to be Implemented**	**Purpose of Implementation**
402.2	Metal Management	Continue replacing, retireing or repowering off-road vehicles with old and dirty engines	2022	Off-road diesel equipment used at the plant for material handling and transporation	Reduce diesel emissions
402.2	Metal Management	Explore the possibility of transmitter automation on abatement devices	2022	PLTCM Entry Baghouse Differential Pressure Transmitter	Better monitoring of the abatement device's performance

Appendix

Insert any attachments and supplemental information within the corresponding sections of the EMP or at the end of this document. Label each attachment with the corresponding Attachment #.

In the table below, list each Attachment # and provide the Page # and Section # (if applicable) of the EMP where the material is referenced.

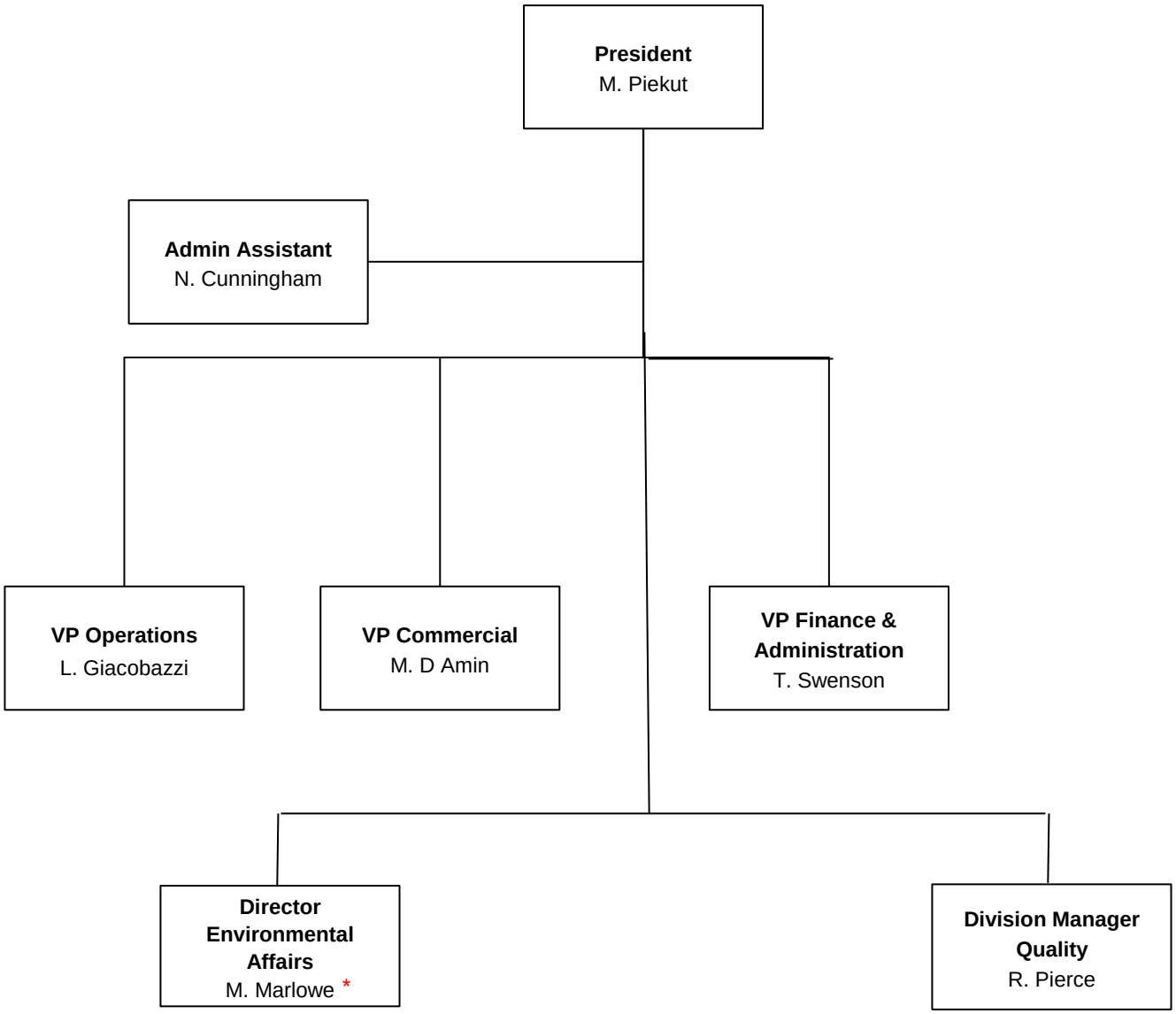
Attachment #	Reference to Page # and Section # of EMP
A	Page #7, Section #
B	Page #52, Section #
C	Page #52, Section #
D	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #

Attachment # A

Company Organizational Chart

UPI
A United States Steel Company

Executive Steering Team



January 2022

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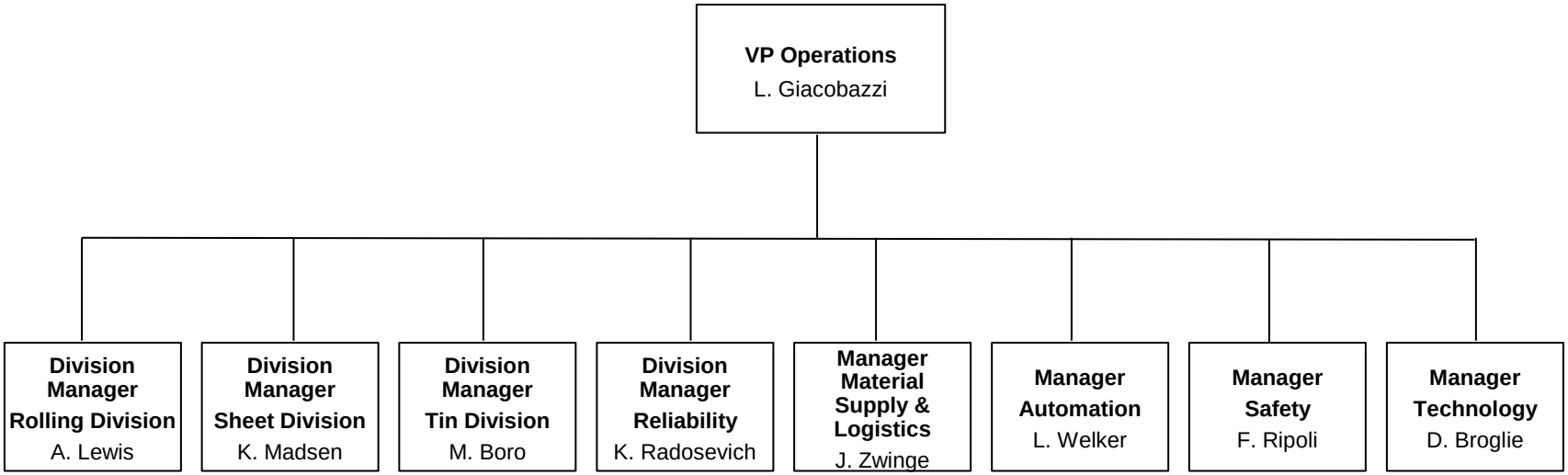
Operations



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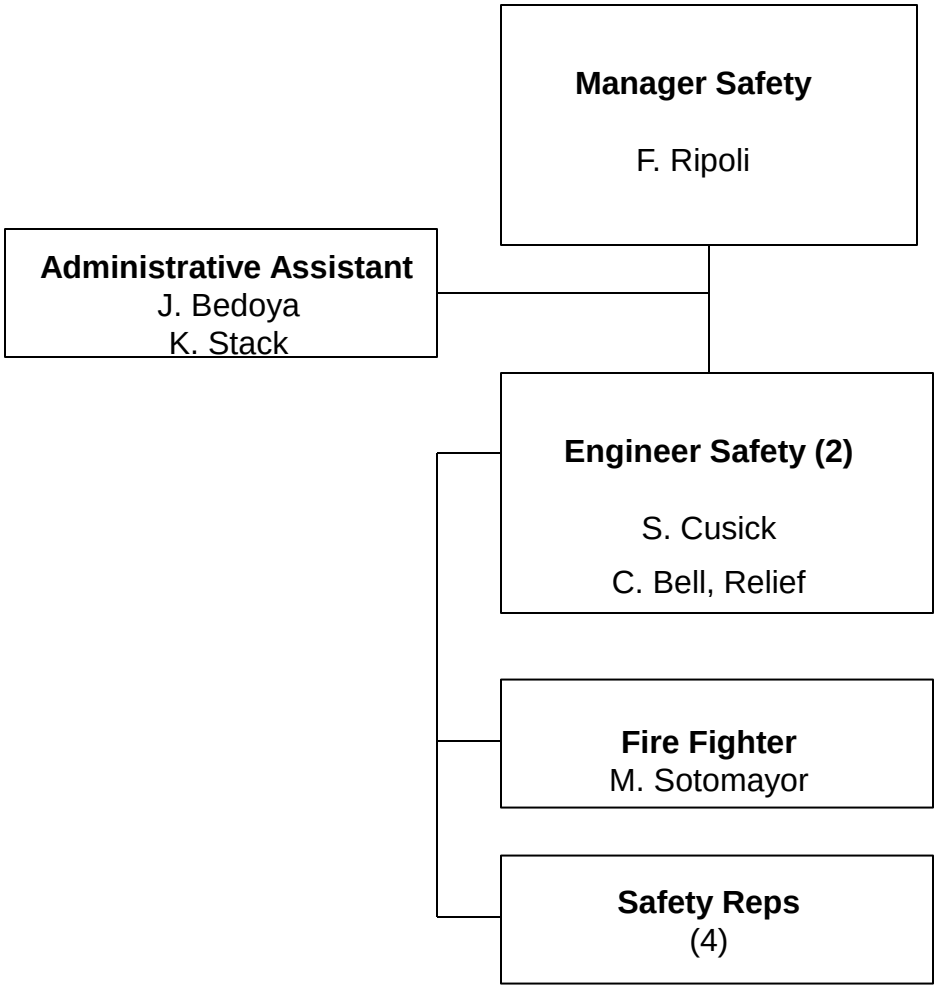
Operations - Safety



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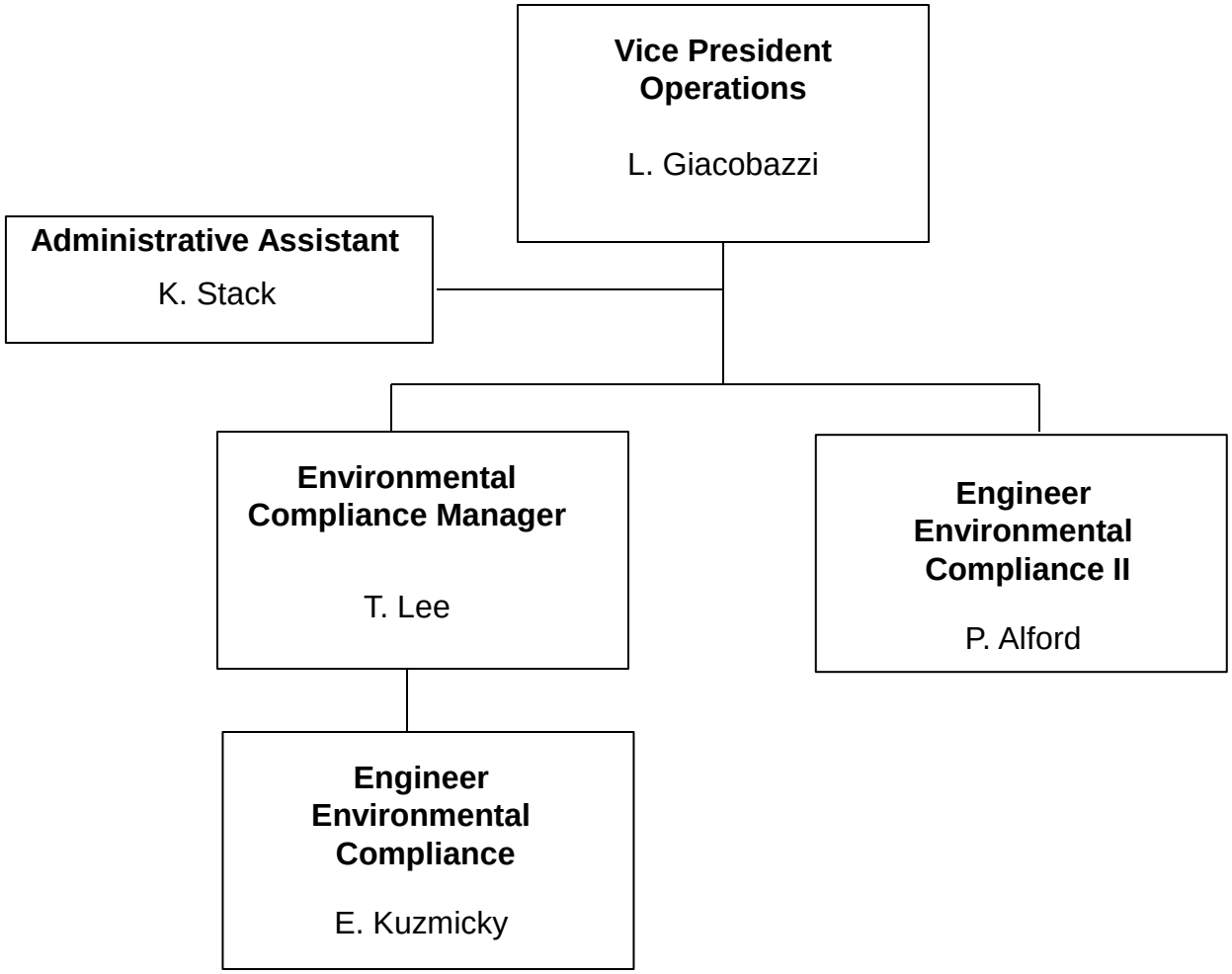
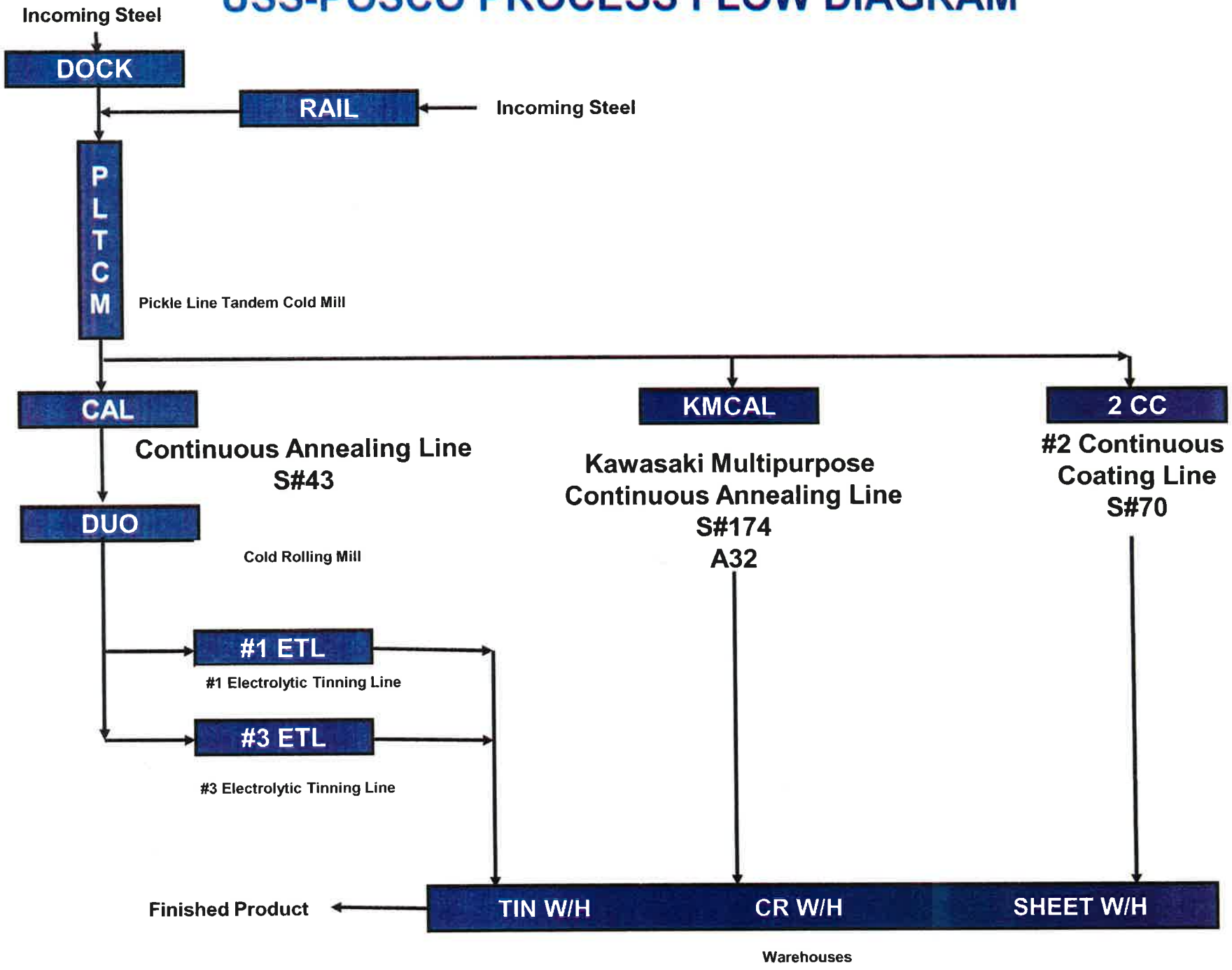
Environmental



Attachment # B

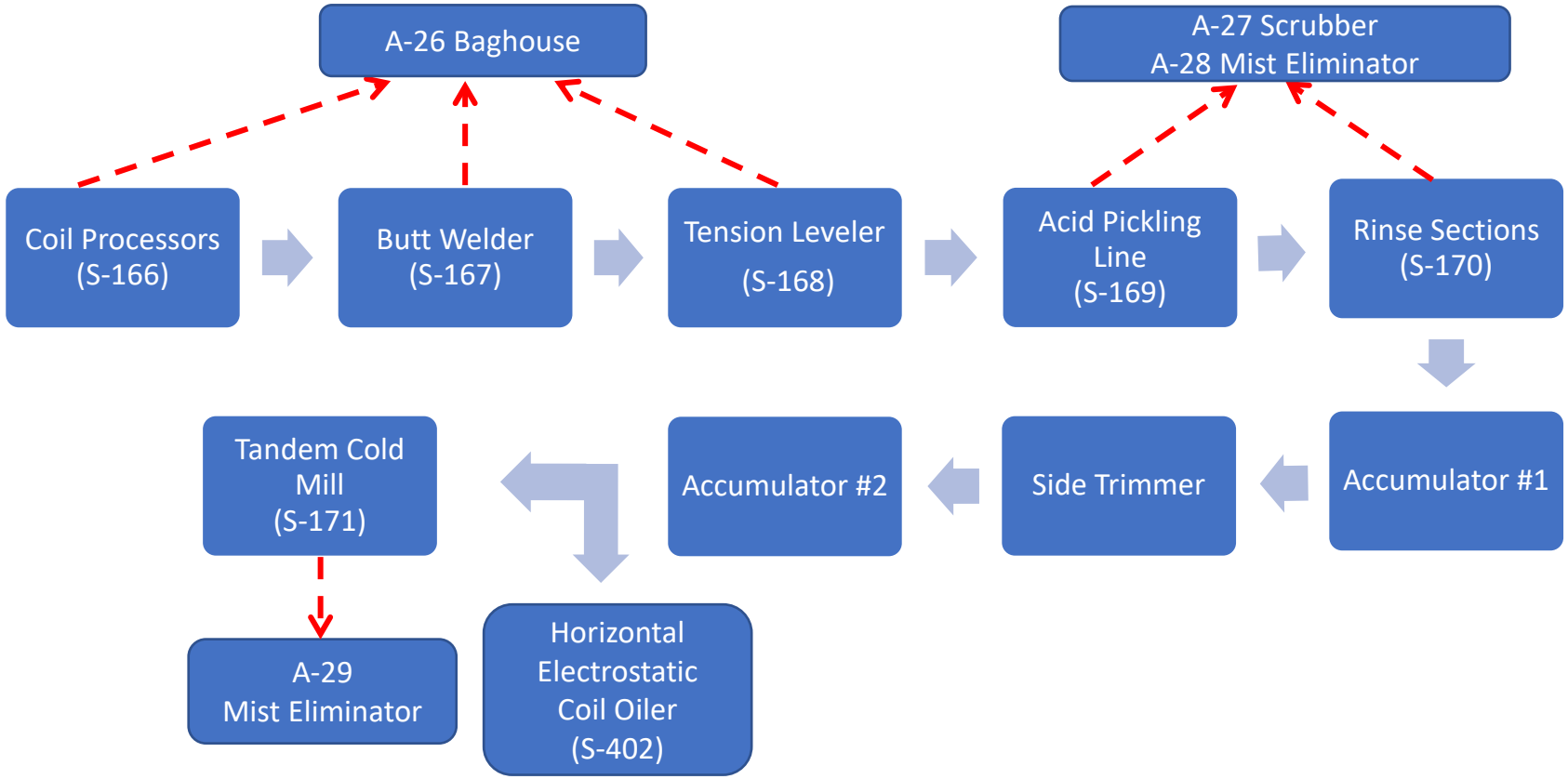
Process Flow Diagram

USS-POSCO PROCESS FLOW DIAGRAM



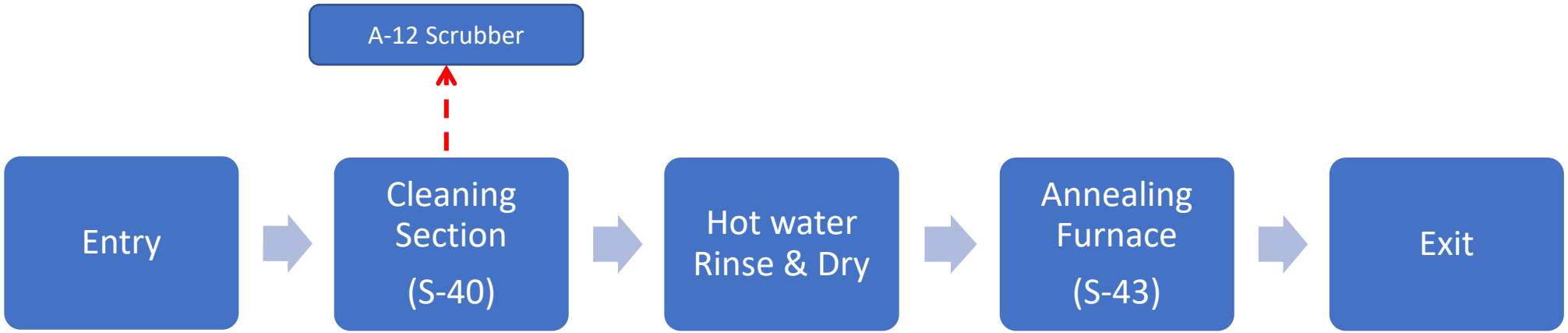
PLTCM

(Pickle Line and Tandem Cold Mill)



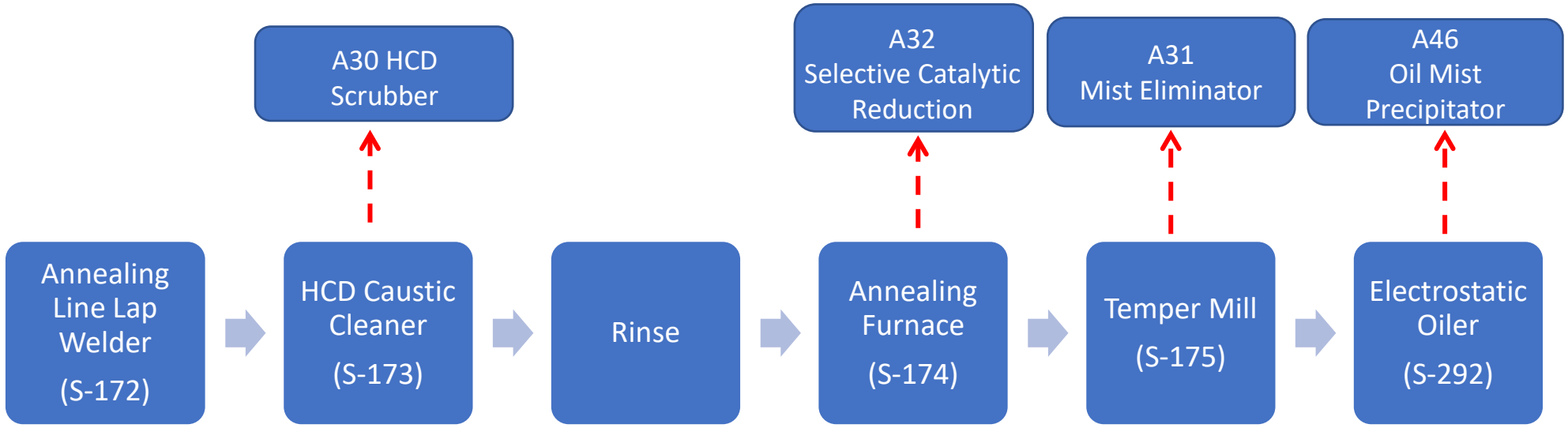
CA Line

(Continuous Annealing Line)



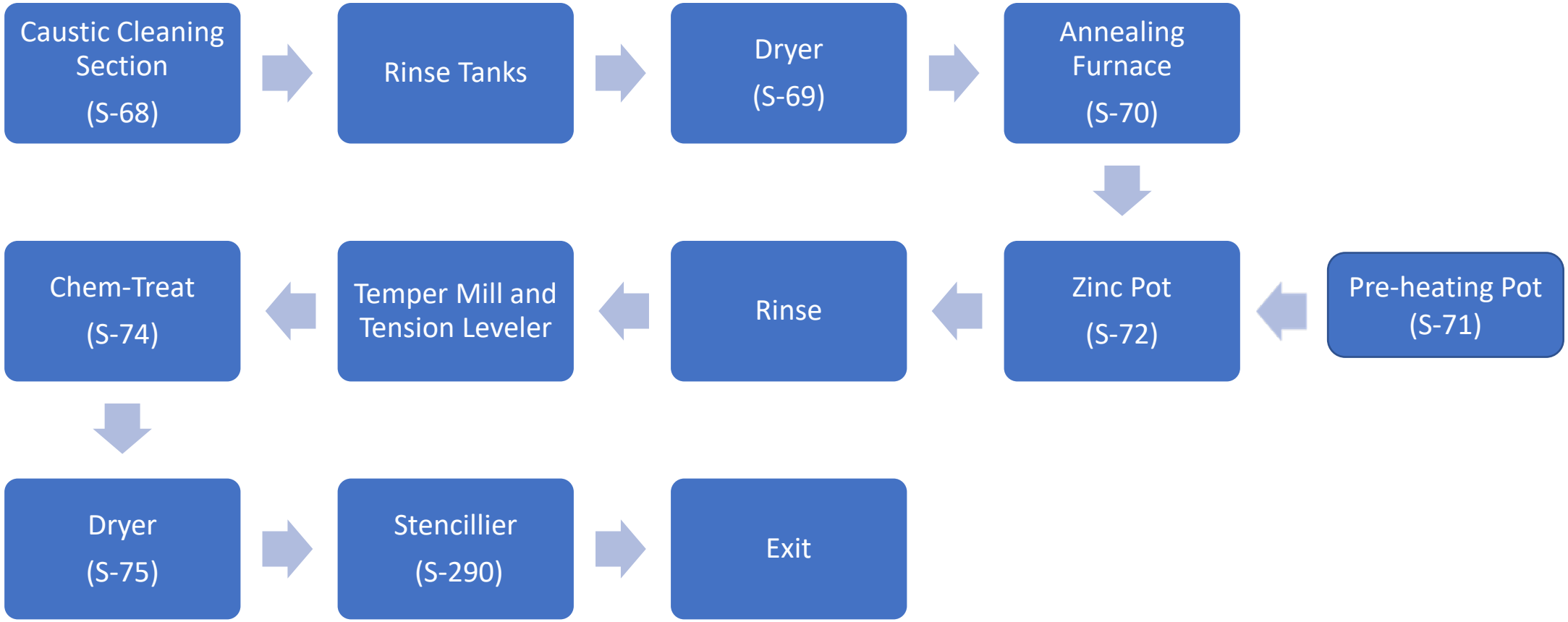
KMCAL

(Kawasaki Multipurpose Continuous Annealing Line)



CC#2

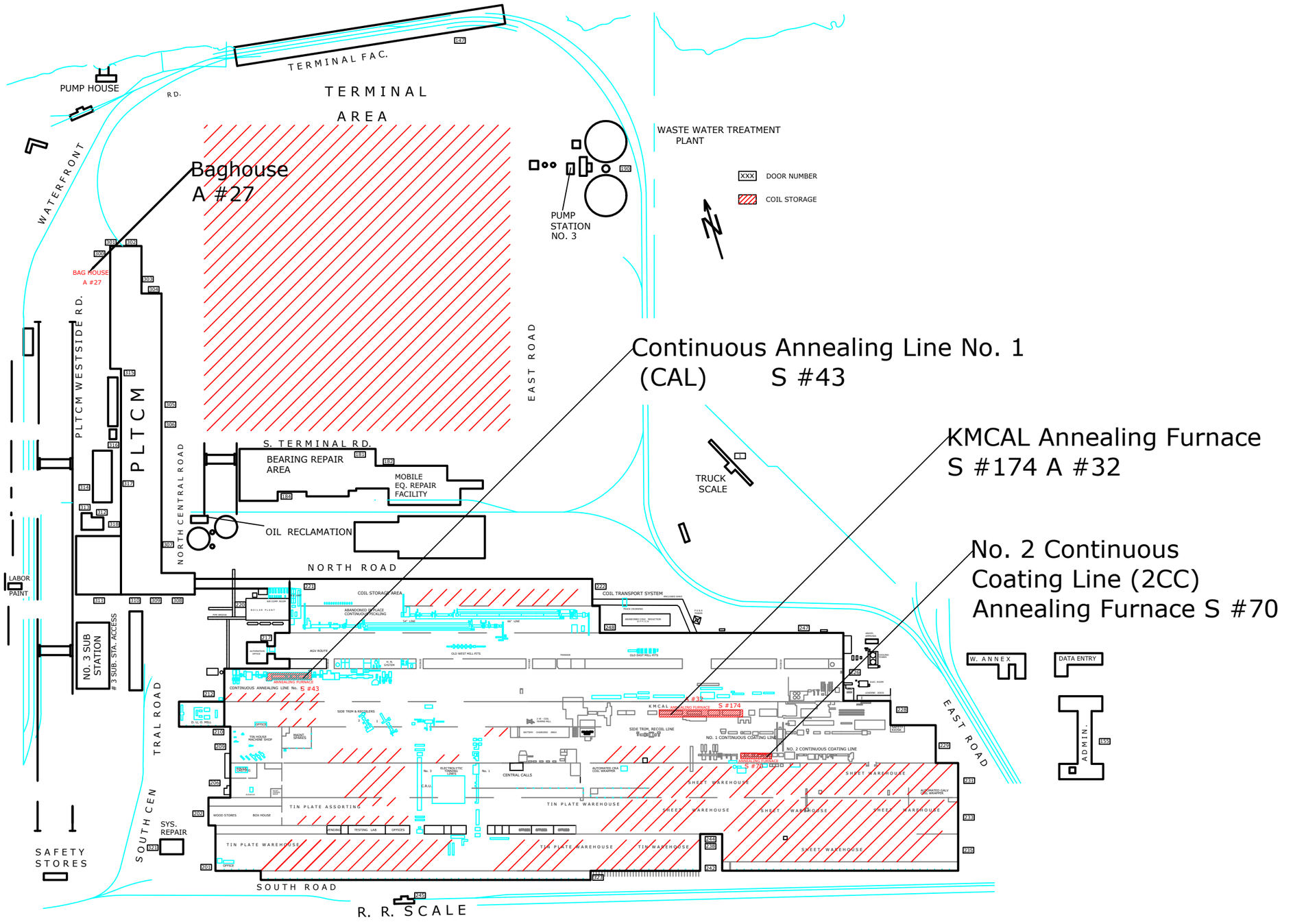
(Continuous Galvanizing Line #2)



Attachment # C

Facility Layout

UPI A United States Steel Company	DRAWN BY RPS	CHECKED BY	SCALE	Plant General - Environmental BAAQMD Emissions Map 2021 Application	375-HE-0001
	MANAGER TECHNOLOGY		DATE 4/22/2021		REVISIONS



Attachment # D

BAAQMD APCO Approval

Facility Name: USS UPI Date: March 16, 2022

APCO Recommendations to EMP and Determination of Approvability (12-13-405)

Provide determination of acceptance to APCO recommendations. Include the determination of acceptance by the facility's Responsible Manager and the basis for rejecting any APCO recommendations. If recommendation is accepted, include measures to implement APCO recommendation and the proposed date of implementation.

Section #	(AIR DISTRICT USE ONLY) APCO Recommendation	Acceptance of APCO Recommendation	If NO: Basis for Rejecting APCO Recommendation	If YES: Measures to Implement Recommendation	Proposed Date of Implementation	(AIR DISTRICT USE ONLY) Approval of Response
1		☐ Yes ☐ No				☐ Yes ☐ No
2		☐ Yes ☐ No				☐ Yes ☐ No
3		☐ Yes ☐ No				☐ Yes ☐ No
4		☐ Yes ☐ No				☐ Yes ☐ No
5		☐ Yes ☐ No				☐ Yes ☐ No

6		☐ Yes ☐ No				☐ Yes ☐ No
7		☐ Yes ☐ No				☐ Yes ☐ No
8		☐ Yes ☐ No				☐ Yes ☐ No
9		☐ Yes ☐ No				☐ Yes ☐ No