Bay Area Air Quality Management District

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Statement of Basis and Evaluation Report
for
MINOR REVISION
to the
Major Facility Review Permit

for

AB&I Foundry
Facility #A0062

Facility Address:
7825 San Leandro Street
Oakland, CA 94621

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May 2020

Application Engineer: M.K. Carol Lee
Site Engineer: M.K. Carol Lee

Application: 29310

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STATEMENT OF BASIS

This is minor permit revision pursuant to Regulation 2, Rule 6, section 215. The marked-up Title V sections are provided in the Appendix of the Evaluation Report (Application # 29219) that follows this Statement of Basis.

Section II

Table II B will be revised to add A-68 Baghouse #6 to the list of abatement devices.

Section IV

Table IV-B will be revised to include A-68.

Section VI

Section VI will be revised to amend permit conditions # 23650 and 25039 to add A-68 Baghouse #6. The text of the changes can be found in the Conditions Section of the Evaluation Report.

EVALUATION REPORT
AB&I Foundry
Application #29219 - Plant #62

I. BACKGROUND

AB&I Foundry has applied for an Authority to Construct the following abatement equipment:

A-68 Fabric Filter Baghouse (Baghouse #6), BHM, 459-6RA, 40,000 ACFM; to abate S-2 Pouring, Cooling and Shakeout

A-68 (Baghouse #6) is being added to AB&I's operation for increased control of ambient particulate within their facility for compliance with the Federal OSHA standards. S-2 (Pouring, Cooling, and Shakeout) is a part of their metal casting process where newly poured castings are separated from their sand molds. A-68 will add abatement to S-2 which is currently abated by A-14 (Baghouse #2), A-21 (Baghouse #5), and A-63 (Baghouse #4).

A-21 (Baghouse #5) abates during and just after the pouring at S-2. Next is A-63 (Baghouse #4) which abates the beginning stage of oscillators of S-2, where the first of the shakeout process occurs and the castings begin separating from the molds. A-68 (Baghouse #6) will be added to abate the middle stages of the shakeout, as well as the sand belt which returns the used sand to be recycled into new molds. A-14 (Baghouse #2) abates the last stage of the shakeout and parts of the grinding/finishing operation.

A-68 will be equipped with pressure differential bag monitors and bag leak detectors to ensure that it is operating correctly.

II. EMISSION CALCULATIONS

The addition of one baghouse to existing operations of S-2 will not result in an increase of emissions. AB&I has requested no increase of throughput at S-2, which has an existing permit limit of 36,000 tons/yr of metal cast. As a result, there is no cumulative increase estimated for the addition of A-68 and S-2 is not a modified source.

III. HEALTH RISK ANALYSIS (HRA)

A HRA form was not required with this application since there is no increase of emissions estimated as a result of this application.

IV. BEST AVAILABLE CONTROL TECHNOLOGY

Because there is no increase of emissions estimated and S-2 is not modified source by the addition of A-68, BACT is not triggered.

V. OFFSETS

Because there is no increase of emissions estimated and S-2 is not modified source by the addition of A-68, offsets are not triggered.

VI. STATEMENT OF COMPLIANCE

S-2 and A-68 are subject and will continue to comply with Regulation 6, Rule 1 "Particulate Matter – General Requirements. The PM10 abatement efficiency of A-68 is guaranteed by the

abatement manufacturer to have the following efficiency and grain loading rates:

Source S-#	Abated by A-#	Abatement Efficiency	Grain Loading Rate (gr/dscf)
S-2	A-68	99.0%	0.01

This project is considered to be exempt under the District's CEQA Regulation 2-1-312.2 for permit applications to install air pollution control or abatement equipment and therefore is not subject to CEQA review. A CEQA Notice of Exemption will be filed with Contra Costa County.

This project is over 1,000 ft from the nearest public school and is therefore not subject to the public notification requirements of Regulation 2-1-412.

NSPS
There is no applicable New Source Performance Standard for S-2.

NESHAP
AB&I is a Major Facility under Title V of the Federal Clean Air Act because its actual emissions of carbon monoxide (CO) exceeds 100 tons per year. In 2008, AB&I was also a Major Facility of Precursor Organic Compound (POCs), because its actual emissions of POCs exceeded 100 tons that year. AB&I was a Major Facility for hazardous air pollutants for trichloroethane which was a carrier solvent in their asphalt coating for pipe manufactured at the facility. After 2008, AB&I reformulated their coating operations and reduced POC and HAP emissions by eliminating trichloroethane and switching to a hot dip asphalt coating. AB&I is subject to the National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries (40 CFR 63, Subpart EEEEE).

S-2 Pouring, Cooling, and Shakeout is subject to emission limitations per Subsection 63.7690(a)(5) for pouring stations at existing iron and steel foundry. S-2 will continue to comply with applicable NESHAP requirements with the addition of A-68. They are required by NESHAP requirements to monitor every 6 months for opacity and source test every 5 years to verify compliance with the grain loading requirement of 0.01 gr/dscf. Their Title V permit includes these NESHAP requirements (see Section VIII).

VII. CONDITIONS

I recommend the following changes to Condition # 23650 for S-2 to reflect the addition of A-68 Baghouse #6: [strikethroughs indicate deletions while underlines indicate additions]

Condition # 23650

For S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse#2, A-63 Baghouse#4, ~~and~~ A-21 Baghouse#5, and A-68 Baghouse #6

1. The owner/operator shall abate S-2 Pouring, Cooling, Shakeout with A-14 Baghouse#2, A-21Baghouse#5, ~~and~~ A-63 Baghouse#4, and A-68 Baghouse #6 during all periods of operation. (basis: cumulative increase)

2. [Deleted. Replaced by CAM condition]

3. [Deleted. Replaced by CAM condition]

4. The owner/operator shall ensure A-14 Baghouse#2, A-21 Baghouse No.5, A-63 Baghouse #4, and A-68 Baghouse #6 outlet grain loading does not exceed 0.01 gr/dscf. (basis: cumulative increase; 40 CFR 63.7690(a)(5)(i))

5. [Deleted. Moved sand throughput limit to S-3 Sand Preparation]

6. Unless otherwise indicated in specific permit conditions, the owner/operator shall maintain the following records for S-2:
   a. monthly throughput of iron poured
   b. total material throughput for the preceding 12 months
   (basis: Regulation 2-1-403)

7. The owner/operator shall perform District-approved source test at least once every 5 years for VOC to demonstrate compliance with Regulation 8, Rule 2. The owner/operator shall obtain approval for all source test procedures from the District's Source Test Section prior to conducting any tests. The owner/operator shall comply with all applicable testing requirements as specified in Volume V of the District's Manual of Procedures. The owner/operator shall notify the District's Source Test Section in writing of the source test protocols and projected test dates at least 7 days prior to testing. All measurements, records, and data for each source test shall be retained by the owner/operator for at least five years and made available to the District upon request. (basis: Regulation 2-1-403)

8. The owner/operator shall ensure total iron cast in S-58 and S-59 at this facility shall not exceed 36,000 tons in any consecutive 12-month period. (basis: cumulative increase)

9. Not later than 60 days from the startup of A-68 Baghouse # 6, the owner/operator shall conduct District approved source tests to determine initial compliance with the limits in Part 4 for A-68. The owner/operator shall submit the source test results to the District staff no later than 60 days after the source test. (basis: BACT, Cumulative Increase)

10. The owner/operator shall obtain approval for all source test procedures from the District's Source Test Section prior to conducting any tests. The owner/operator shall comply with all applicable testing requirements as specified in Volume V of the District's Manual of Procedures. The owner/operator shall notify the District's Source Test Section, in writing, of the source test protocols and projected test dates at least 7 days prior to testing. (basis: BACT, Cumulative Increase)

I recommend the following changes of conditions to Condition # 25039 to reflect the addition of A-68 Baghouse #6 to the CAM conditions: [strikethroughs indicate deletions while underlines indicate additions]

Condition #25039
Compliance Assurance Monitoring (CAM) condition

Parts 1 through 13 apply to the following sources and abatement devices:
S-2 Pouring Cooling Shakeout abated by A-14 Baghouse #2
S-3 Sand Preparation abated by A-15 Baghouse #1
S-4 Wheelabrator Shot Blast (No.1) abated by A-17 Baghouse #3
S-5 Pangborn Shot Blast (No. 2) abated by A-17 Baghouse #3
S-27 Wheelabrator Shot Blast (No. 3) abated by A-17 Baghouse #3
S-30 Inline Shot Blast abated by A-17 Baghouse #3
S-49 Casting Grinding abated by A-14 Baghouse #2 (exempt source abated by the same abatement device as a regulated source subject to CAM)

1. The following definitions apply to the Compliance Assurance Monitoring plan for

sources with associated abatement device mentioned above to assure compliance with Regulation 6:

a. The following is defined as an exceedance:
    i. a visible emission detected using EPA Method 9 which is as dark or darker than No. 1 on the Ringelmann Chart, or of such opacity as to obscure an observer's view to an equivalent or greater degree for more than 3 minutes in any hour.
b. The following are defined as excursions:
    i. any visible emissions detected using EPA Method 22-like observation;
    ii. a pressure drop across a baghouse cell in inches of water column that is less than 2 inches or greater than 10 inches.
    (Basis: 40 CFR Part 64.6(c)(2))

2. The owner/operator shall perform at least one 6-minute EPA Method 22-like observation for qualitative visible emissions on the above sources and associated abatement devices at least once every week to ensure compliance with SIP Regulation 6-301. (basis: 40 CFR Part 64.6(c)(1); 40 CFR Part 64.6(c)(3))

3. The owner/operator shall equip the above abatement devices with differential pressure gauges that measure the pressure drop across each baghouse cell in inches of water column. The gauges shall have a minimum accuracy of 0.5 inches water column. (Basis: 40 CFR Part 64.6(c)(1))

4. The indicator range that assures no visible emissions from the above sources and their associated abatement devices shall be a pressure drop across a baghouse cell of 2 to 10 inches of water column. (40 CFR Part 64.3(a)(2))

5. The owner/operator shall take a reading of the differential pressure gauges at least once per day. The pressure readings shall be recorded in a District-approved log. (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))

6. The pressure gauges shall be visually inspected prior to use and the owner/operator shall ensure that the gauges are calibrated in accordance with AB&I's Operation and Maintenance Plan (non-NESHAP). (Basis: 40 CFR Part 64.3(b)(3) and (b)(2))

7. If an excursion occurs at any of the sources above, the owner/operator shall follow the corrective action plan contained in AB&I's Operation and Maintenance Plan (non-NESHAP). If excursions continue to occur, the District may require the owner/operator to develop and implement a Quality Improvement Plan (QIP). (Basis: 40 CFR Parts 64.6(c)(3), 64.7(d)(2), 64.8)

8. If 2 or more excursions at the same abatement device occur within two weeks, a certified observer shall perform a Method 9 observation on the associated abatement device within 48 hours of the second excursion. (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))

9. The owner/operator of the above sources and their associated abatement devices shall submit a monitoring report to the District in accordance with 40 CFR Part 70.6(a)(3)(iii)

(every six months). The report shall include all of the following information:

a. Summary information on the number, duration, and cause of excursions or exceedances and the corrective actions taken;
b. Summary information on the number, duration, and cause for monitor downtime incidents.

(Basis: 40 CFR Part 64.6(c)(3) and 40 CFR Part 64.9(a)(2))

10. The owner/operator shall inspect, operate and maintain each baghouse and monitoring device in accordance with AB&I's Operation and Maintenance Plan (non-NESHAP). (Basis: 40 CFR Part 64.6(c)(1)(iii))

11. The owner/operator shall perform source tests for the above sources and their associated abatement devices at least once every 5 years to demonstrate with compliance with PM limits and opacity limits. The owner/operator shall obtain approval for all source test procedures from the District's Source Test Section prior to conducting any tests. The owner/operator shall comply with all applicable testing requirements as specified in Volume V of the District's Manual of Procedures. The owner/operator shall notify the District's Source Test Section, in writing, of the source test protocols and projected test dates at least 7 days prior to testing, excluding Method 9 observations performed for Part 8 above. (Basis: Regulation 2-1-403)

12. The owner/operator shall keep the records, including dates and time, of the pressure drop measurements, visible emission observations, calibrations, inspections, maintenance, monitor downtime incidents, test results, excursions, exceedances, and corrective action taken for at least 5 years and shall make the records available to District staff upon request. (Basis: Regulation 2-6-501 Recordkeeping)

13. The owner/operator shall submit AB&I's Operation and Maintenance Plan (non-NESHAP) to the District's Engineering Division and Compliance and Enforcement Division for review and approval within 30 days of issuance of the Title V permit renewal in 2012. AB&I's Operation and Maintenance Plan (non-NESHAP) shall include a monitoring plan, a corrective action plan, a list of frequently needed spare parts that shall be kept onsite, details, procedures, and frequency of inspections, preventative maintenance, and recordkeeping, and documentation templates. Any changes to AB&I's Operation and Maintenance Plan (non-NESHAP) must be submitted to the District's Engineering Division and Compliance and Enforcement Division for review and approval 21 days prior to being implemented. If the District does not provide a response within 21 days, the facility may implement the plan. (Basis: 40 CFR Part 64.6(c)(1)(iii))

Parts 14 through 28 apply to the following sources and abatement devices equipped with bag leak detectors:
S-1 Cupola abated by A-20 and A-22 Afterburners and A-19 Baghouse
S-2 Pouring Cooling Shakeout abated by A-21 Baghouse #5, A-63 Baghouse #4, A-68 Baghouse #6

14. The following definitions apply to the Compliance Assurance Monitoring plan for sources with associated abatement devices mentioned above to assure compliance with Regulation 6:

a. The following is defined as an exceedance:
    i. a visible emission detected using EPA Method 9 which is as dark or darker than No. 1 on the Ringelmann Chart, or of such opacity as to obscure an observer's view to an equivalent or greater degree for more than 3 minutes in any hour.

b. The following are defined as excursions:
    i. Detection by the bag leak detector of particulate matter emissions at concentrations of greater than 10 milligrams per actual cubic meter for 15 minutes or longer;
    ii. a pressure drop across a baghouse cell in inches of water column that is less than 2 inches or greater than 10 inches.

(Basis: 40 CFR Part 64.6(c)(2))

15. The owner/operator shall equip each of the above abatement devices with a bag leak detector that complies with 40 CFR Part 63, Subpart EEEEE (NESHAPs for Iron and Steel Foundries) (Basis: 40 CFR Part 64.6(c)(1); 40 CFR Part 64.6(c)(3))

16. The owner/operator shall equip A-19, A-21, ~~and~~ A-63, and A-68 bag leak detection systems with an alarm system. Following an alarm, owner/operator shall follow the corrective action procedures in AB&I's Operation and Maintenance Plan (NESHAP), developed and maintained in accordance with 40 CFR Part 63, Subpart EEEEE. (Basis: 40 CFR Part 64.6(c)(1))

17. The concentration of particulate matter emissions that assures no visible emissions from A-19, A-21, and A-63 shall be less than 10 milligrams per actual cubic meter. (Basis: 40 CFR Part 64.3(a)(2))

18. The owner/operator shall visually inspect and test the bag leak detection sensors in accordance with AB&I's Operation and Maintenance Plan (NESHAP), developed and maintained in accordance with 40 CFR Part 63, Subpart EEEEE. (Basis: 40 CFR Part 64.3(b)(3) and (b)(2))

19. The owner/operator shall equip the above abatement devices with differential pressure gauges that measure the pressure drop across each baghouse cell in inches of water column. The gauges shall have a minimum accuracy of 0.5 inches water column. (Basis: 40 CFR Part 64.6(c)(1))

20. The indicator range that assures no visible emissions from the above sources and their associated abatement devices shall be a pressure drop across a baghouse cell of 2 to 10 inches of water column. (40 CFR Part 64.3(a)(2))

21. The owner/operator shall take a reading of the pressure gauges at least once per day. The pressure readings shall be recorded in a District-approved log. (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))

22. The pressure gauges shall be visually inspected prior to use and the owner/operator shall ensure that the gauges are calibrated in accordance with AB&I's Operation and Maintenance Plan (NESHAP), developed and maintained in accordance with 40 CFR

Part 63, Subpart EEEEE. (Basis: 40 CFR Part 64.3(b)(3) and (b)(2))

23. If an excursion occurs at any of the sources above, the owner/operator shall follow the corrective action plan contained in AB&I's Operation and Maintenance Plan (NESHAP), developed and maintained in accordance with 40 CFR Part 63, Subpart EEEEE. If excursions continue to occur, the District may require the owner/operator to develop and implement a Quality Improvement Plan (QIP). (Basis: 40 CFR Parts 64.6(c)(3), 64.7(d)(2), 64.8)

24. If 2 or more excursions at the same abatement device occur within two weeks, a certified observer shall conduct a Method 9 on the associated abatement device within 48 hours of the second excursion. (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))

25. The owner/operator of the above sources and their associated abatement devices shall submit a monitoring report to the District in accordance with 40 CFR Part 70.6(a)(3)(iii) (every six months). The report shall include all of the following information:
    a. Summary information on the number, duration, and cause of excursions or exceedances and the corrective actions taken;
    b. Summary information on the number, duration, and cause for monitor downtime incidents.

    (Basis: 40 CFR Part 64.6(c)(3) and 40 CFR Part 64.9(a)(2))

26. The owner/operator shall inspect each baghouse and monitoring system in accordance with AB&I's Operation and Maintenance Plan (NESHAP), developed and maintained in accordance with 40 CFR Part 63, Subpart EEEEE . (Basis: 40 CFR Part 64.6(c)(1)(iii))

27. The owner/operator shall perform source tests for the above sources and their associated abatement devices at least once every 5 years to demonstrate with compliance with PM limits and opacity limits. The owner/operator shall obtain approval for all source test procedures from the District's Source Test Section prior to conducting any tests. The owner/operator shall comply with all applicable testing requirements as specified in Volume V of the District's Manual of Procedures. The owner/operator shall notify the District's Source Test Section, in writing, of the source test protocols and projected test dates at least 7 days prior to testing, excluding the Method 9 observations taken per Part 24 above. (Basis: Regulation 2-1-403)

28. The owner/operator shall keep the records, including dates and time, of the pressure drop measurements, visible emission observations, calibrations, inspections, maintenance, monitor downtime incidents, test results, excursions, exceedances, and corrective action taken for at least 5 years and shall make the records available to District staff upon request. (Basis: Regulation 2-6-501 Recordkeeping)

VIII. TITLE V PERMIT

This facility is a Major Facility with a current Title V permit. The changes to Conditions # 23650 and 25039 will be changed in the Title V permit. In addition, proposed changes to Tables II and IV of the Title V permit are included in Appendix A of this evaluation. The facility has submitted a Title V permit application (Application # 29310) for the proposed changes.

IX. RECOMMENDATION

I recommend an Authority to Construct be issued to AB&I for the following:

A-68 Fabric Filter Baghouse (Baghouse #6), BHM, 459-6RA, 40,000 ACFM; to abate S-2 Pouring, Cooling and Shakeout

---
M.K. Carol Lee
Senior Air Quality Engineer
Engineering Division
Date:

Appendix A

The following are the proposed changes to Tables in sections II and IV and CAM Condition # 25039. The change to Condition # 23650 is indicated in Section VII of the evaluation report.

Table II B - Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Emission Limitation
A-14	Baghouse#2	S-2	BAAQMD Reg. 6-1-301	No visible emissions; pressure drop between 2 and 10 inches water column	Ringelmann 1
A-14	Baghouse#2	S-2	BAAQMD Reg. 6-1-310	No visible emissions; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.15 gr/dscf
A-14	Baghouse#2	S-2	BAAQMD Reg. 6-1-311	No visible emissions; pressure drop between 2 and 10 inches water column	$4.10P^{0.67}$ lb/hr, where P is source process weight in ton/hr
A-15	Baghouse#1	S-3	BAAQMD Condition 2237, part 4	No visible emissions; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.04 gr/dscf
A-15	Baghouse#1	S-3	BAAQMD Reg. 6-1-301	No visible emissions; pressure drop between 2 and 10 inches water column	Ringelmann 1
A-15	Baghouse#1	S-3	BAAQMD Reg. 6-1-310	No visible emissions; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.15 gr/dscf
A-15	Baghouse#1	S-3	BAAQMD Reg. 6-1-311	No visible emissions; pressure drop between 2 and 10 inches water column	$4.10P^{0.67}$ lb/hr, where P is source process weight in ton/hr

Table II B - Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Emission Limitation
A-17	Baghouse#3	S-4, S-5, S-27, S-30	BAAQMD Reg. 6-1-301	No visible emissions; pressure drop between 2 and 10 inches water column	Ringelmann 1
A-17	Baghouse#3	S-4, S-5, S-27, S-30	BAAQMD Reg. 6-1-310	No visible emissions; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.15 gr/dscf
A-17	Baghouse#3	S-4, S-5, S-27, S-30	BAAQMD Reg. 6-1-311	No visible emissions; pressure drop between 2 and 10 inches water column	$4.10P^{0.67}$ lb/hr, where P is source process weight in ton/hr
A-19	Cupola Baghouse	S-1, S-28	40 CFR 63.7690(a)(2)(i)	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.006 gr/dscf
A-19	Cupola Baghouse	S-1, S-28	BAAQMD Reg. 6-1-301	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	Ringelmann 1
A-19	Cupola Baghouse	S-1, S-28	BAAQMD Reg. 6-1-310	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.15 gr/dscf
A-19	Cupola Baghouse	S-1, S-28	BAAQMD Reg. 6-1-311	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	$4.10P^{0.67}$ lb/hr, where P is source process weight in ton/hr

Table II B - Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Emission Limitation
A-20	Afterburner # 1, 8 MMBtu/hr	S-1	40 CFR Part 63.7690(a)(8)	1300 degrees F minimum operating temperature, except as provided by 40 CFR 63.7690	20 ppmv VOHAP @ 10% O2
A-21	Baghouse # 5	S-2	40 CFR Part 63.7690(a)(5)(i); Condition # 17097, Part 4	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.01 gr/dscf
A-21	Baghouse # 5	S-2	BAAQMD Reg. 6-1-301	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	Ringelmann 1
A-21	Baghouse # 5	S-2	BAAQMD Reg. 6-1-310	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.15 gr/dscf
A-21	Baghouse # 5	S-2	BAAQMD Reg. 6-1-311	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	$4.10P^{0.67}$ lb/hr, where P is source process weight in ton/hr
A-22	Afterburner # 2, 8 MMBtu/hr	S-1	40 CFR Part 63.7690(a)(8)	1300 degrees F minimum operating temperature, except as provided by 40 CFR 63.7690	20 ppmv VOHAP @ 10% O2
A-25	Fume Baghouse	S-25	Condition # 9668, Part 4	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.002 gr/dscf

Table II B - Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Emission Limitation
A-25	Fume Baghouse	S-25	BAAQMD Reg. 6-1-301	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	Ringelmann 1
A-25	Fume Baghouse	S-25	BAAQMD Reg. 6-1-310	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.15 gr/dscf
A-25	Fume Baghouse	S-25	BAAQMD Reg. 6-1-311	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	$4.10P^{0.67}$ lb/hr, where P is source process weight in ton/hr
A-35	Fiber Bed Mist Collector	S-34, S-35, S-36	BAAQMD Reg. 7		15,000 DCFM
A-36	Mist Eliminator	S-34, S-35, S-36	BAAQMD Reg. 7		21,931 DCFM
A-63	Baghouse #4	S-2	BAAQMD Regulation 6-1-301	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	Ringelmann 1
A-63	Baghouse #4	S-2	BAAQMD Regulation 6-1-310	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	Grain loading not to exceed 0.15 gr/dscf
A-63	Baghouse #4	S-2	BAAQMD Regulation 6-1-311	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	$4.10P^{0.67}$ lb/hr, where P is source process weight in ton/hr

Table II B - Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Emission Limitation
A-68	Baghouse #6	S-2	BAAQMD Regulation 6-1-311	Bag Leak Detector < 10 mg/actual cubic meter; pressure drop between 2 and 10 inches water column	$4.10P^{0.67}$ lb/hr, where P is source process weight in ton/hr

Table IV - B
Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements
S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-63 Baghouse #4, ~~and~~ A-21 Baghouse #5, and A-68 Baghouse #6

Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
BAAQMD Regulation 6, Rule 1	**Particulate Matter (12/05/07)**						
6-1-301	Ringelmann 1.0 Limitation	OPACITY Ringelmann 1.0 < 3 min/hr	40 CFR 63.7740(b); CAM Condition #25039, Part 15 (A-21, A-63, A-68)	Bag leak detector C	Once every six months	Y	N
			CAM Condition #25039 Part 21 (A-21, A-63, A-68)	Pressure drop monitoring P/D	Once every six months	Y	N
			CAM Condition #25039 Part 2 (A-14, A-21, A-63, A-68)	Visible Emissions (M22) P/W	Once every six months	Y	N

Table IV - B
Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements
S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-63 Baghouse #4, ~~and~~ A-21 Baghouse #5, and A-68 Baghouse #6

Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
			CAM Condition #25039 Part 5 (A-14, A-63)	Pressure drop monitoring P/D	Once every six months	Y	N
			CAM Condition #25039, Part 11 (A-14, A-63) and Part 27 (A-21)	Source Test P/Every 5 years	Every 5 years	Y	N
6-1-305	Visible Particles						N
6-1-310	Particulate Weight Limitation	FILTERABLE PARTICULATE 0.15 gr/dscf	40 CFR 63.7740(b); CAM Condition #25039, Part 15 (A-21)	Bag leak detector C	Once every six months	Y	N
			CAM Condition #25039 Part 21 (A-21)	Pressure drop monitoring P/D	Once every six months	Y	N
			CAM Condition #25039 Part 2 (A-14, A-63)	Visible Emissions (M22) P/W	Once every six months	Y	N
			CAM Condition #25039 Part 5 (A-14, A-63)	Pressure drop monitoring P/D	Once every six months	Y	N

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Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements
S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-63 Baghouse #4, ~~and~~ A-21 Baghouse #5, and A-68 Baghouse #6

Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
			CAM Condition #25039, Part 11 (A-14, A-63) and Part 27 (A-21)	Source Test P/every 5 years	Every 5 years	Y	N
6-1-311	General Operations	FILTERABLE PARTICULATE $4.10P^{0.67}$ lb/hr where P is process weight, ton/hr	40 CFR 63.7740(b); CAM Condition #25039, Part 15 (A-21)	Bag leak detector C	Once every six months	Y	N
			CAM Condition #25039 Part 21 (A-21)	Pressure drop monitoring P/D	Once every six months	Y	N
			CAM Condition #25039 Part 2 (A-14, A-63)	Visible Emissions (M22) P/W	Once every six months	Y	N
			CAM Condition #25039 Part 5 (A-14, A-63)	Pressure drop monitoring P/D	Once every six months	Y	N
			CAM Condition #25039, Part 11 (A-14, A-63) and Part 27 (A-21)	Source Test P/every 5 years	Every 5 years	Y	N
6-1-401	Appearance of Emissions						N
6-1-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions						N
SIP Regulation 6	**Particulate Matter and Visible Emissions (09/04/98)**						

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S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-63 Baghouse #4, ~~and~~ A-21 Baghouse #5, and A-68 Baghouse #6

Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
6-301	Ringelmann 1.0 Limitation	OPACITY Ringelmann 1.0 < 3 min/hr	40 CFR 63.7740(b); CAM Condition #25039, Part 15 (A-21)	Bag leak detector C	Once every six months	Y	Y
			CAM Condition #25039 Part 21 (A-21)	Pressure drop monitoring P/D	Once every six months	Y	Y
			CAM Condition #25039 Part 2 (A-14, A-63)	Visible Emissions (M22) P/W	Once every six months	Y	Y
			CAM Condition #25039 Part 5 (A-14, A-63)	Pressure drop monitoring P/D	Once every six months	Y	Y
			CAM Condition #25039, Part 11 (A-14, A-63) and Part 27 (A-21)	Source Test P/every 5 years	Once every six months	Y	Y
6-305	Visible Particles						Y
6-310	Particulate Weight Limitation	FILTERABLE PARTICULATE 0.15 gr/dscf	40 CFR 63.7740(b); CAM Condition #25039, Part 15 (A-21)	Bag leak detector C	Once every six months	Y	Y

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Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements
S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-63 Baghouse #4, ~~and~~ A-21 Baghouse #5, and A-68 Baghouse #6

Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
			CAM Condition #25039 Part 21 (A-21)	Pressure drop monitoring P/D	Once every six months	Y	Y
			CAM Condition #25039 Part 2 (A-14~~, A-63~~)	Visible Emissions (M22) P/W	Once every six months	Y	Y
			CAM Condition #25039 Part 5 (A-14~~, A-63~~)	Pressure drop monitoring P/D	Once every six months	Y	Y
			CAM Condition #25039, Part 11 (A-14~~, A-63~~) and Part 27 (A-21, A-63, A-68)	Source Test P/every 5 years	Once every six months	Y	Y
6-311	General Operations	FILTERABLE PARTICULATE 4.10P0.67 lb/hr. where P is process weight, ton/hr	40 CFR 63.7740(b); CAM Condition #25039, Part 15 (A-21, A-63, A-68)	Bag leak detector C	Once every six months	Y	Y
			CAM Condition #25039 Part 21 (A-21, A-63, A-68)	Pressure drop monitoring P/D	Once every six months	Y	Y

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S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-63 Baghouse #4, ~~and~~ A-21 Baghouse #5, and A-68 Baghouse #6

Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
			CAM Condition #25039 Part 2 (A-14, ~~A-63~~)	Visible Emissions (M22) P/W	Once every six months	Y	Y
			CAM Condition #25039 Part 5 (A-14, ~~A-63~~)	Pressure drop monitoring P/D	Once every six months	Y	Y
			CAM Condition #25039, Part 11 (A-14, A-63) and Part 27 (A-21, A-63, A-68)	Source Test P/every 5 years	Once every six months	Y	Y
6-401	Appearance of Emissions						Y
6-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions						Y
BAAQMD Regulation 8, Rule 2	**Organic Compounds: Miscellaneous Operations (7/20/2005)**						
8-2-301	Miscellaneous Operations	VOC 15 lb/day and 300ppmd	BAAQMD Condition #23650, Part 7	Source Test P/Every 5 years	Every 5 years	Y	Y
8-2-601	Determination of Compliance						Y
NESHAP 40 CFR Part 63, Subpart EEEEE	**National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries (02/07/2008)**						
63.7681	Am I subject to this subpart?						Y

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Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements
S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-63 Baghouse #4, ~~and~~ A-21 Baghouse #5, and A-68 Baghouse #6

Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
63.7682	What parts of my foundry does this subpart cover?						Y
63.7683(a)	Existing source compliance deadline (April 23, 2007)						Y
63.7683(b)	Existing source compliance deadline for work practice standards (April 22, 2005)						Y
63.7683(f)	Notification and Schedule requirements (63.7750)						Y
63.7690(a)(5)	Emissions Limitations for each pouring station at existing iron and steel foundry	PM 0.010 gr/dscf; or 0.0008 gr/dscf of total metal HAP	63.7740(b)	Bag leak detector C	Once every six months	Y	Y
			63.7740(b)	Baghouse inspection P/varies			
			63.7731(a); 63.7743(a)(12)	Source Test P/Every 5 years			
63.7710(a)	Operate and maintain foundry consistent with good air pollution control practices						Y
63.7710(b)	Operation and maintenance plan for each capture and collection system and control device						Y
63.7710(b)(1)	Monthly inspections of abatement equipment						Y
63.7710(b)(3)	Preventative maintenance plan for each control device						Y

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S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-63 Baghouse #4, ~~and~~ A-21 Baghouse #5, and A-68 Baghouse #6

Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
63.7710(b)(4)	Monitoring plan for each bag leak detection system						Y
63.7710(b)(5)	Corrective action plan for each baghouse	Initiate corrective action to determine the cause of the alarm within 1 hour of the alarm, initiate corrective action to correct the cause of the problem within 24 hours	63.7745(a)(4)	Record keeping P/E	Once every six months	Y	Y
63.7710(b)(6)	Procedures for providing an ignition source to mold vents of sand mold systems						Y
63.7720(a)	General compliance requirements, exemption startup, shutdown, malfunction						Y
63.7720(c)	Develop a written startup, shutdown, and malfunction plan						Y
63.7730(a)	Initial performance test within 180 days of April 23, 2007	PM or total metal HAP: 63.7690(a)(5)	40 CFR Part 63.7(a)(2)	Initial performance test P/E	Initial	Y	Y
63.7730(b)	Initial demonstration of compliance with work practice standards and operation and maintenance requirements within 30 days of April 22, 2005						Y

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S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-63 Baghouse #4, ~~and~~ A-21 Baghouse #5, and A-68 Baghouse #6

Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
63.7731(a)	Subsequent performance tests for PM	PM or total metal HAP: 63.7690(a)(5)	63.7731(a)	Source Test P/Every 5 years	Every 5 years	Y	Y
63.7732	Test Methods						Y
63.7733	Procedures for establishing operating limits						Y
63.7734(a)(2)	Initial compliance demonstration for existing cupola						Y
63.7735	Initial compliance demonstration with work practice standards						Y
63.7736	Initial compliance demonstration with operation and maintenance requirements						Y
63.7740(b)	Monitoring requirements –for baghouse, use bag leak detection system						Y
63.7740(c)(1)	Monitoring requirements – Baghouse inspection requirements	Pressure drop Normal operating range	63.7740(c)(1)	Pressure drop monitoring P/D	Once every six months	Y	Y
63.7740(c)(2)	Monitoring requirements – Baghouse inspection requirements	Check dust removal from hoppers	63.7740(c)(2)	Visual inspection P/W	Once every six months	Y	Y
63.7740(c)(3)	Monitoring requirements – Baghouse inspection requirements	Adequate compressed air supply for pulse-jet baghouses	63.7740(c)(3)	Inspection P/D	Once every six months	Y	Y

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S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-63 Baghouse #4, ~~and~~ A-21 Baghouse #5, and A-68 Baghouse #6

Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
63.7740(c)(4)	Monitoring requirements – Baghouse inspection requirements	Monitor cleaning cycles	63.7740(c)(4)	Inspection P/A	Once every six months	Y	Y
63.7740(c)(5)	Monitoring requirements – Baghouse inspection requirements	Check bag cleaning mechanisms	63.7740(c)(5)	Visual inspection P/M	Once every six months	Y	Y
63.7740(c)(7)	Monitoring requirements – Baghouse inspection requirements	Check physical integrity of baghouses interior	63.7740(c)(7)	Visual inspection P/Q	Once every six months	Y	Y
63.7740(c)(8)	Monitoring requirements – Baghouse inspection requirements	Inspect fans for wear, material buildup, corrosion	63.7740(c)(8)	Visual inspection P/Q	Once every six months	Y	Y
63.7741(b) (1-5)	Install, operate, maintain a bag leak detection system						Y
63.7741(f) (1,2,3)	CPMS requirements						Y
63.7742	Monitoring and collection of data to demonstrate continuous compliance (excluding malfunctions, associated repairs, required quality assurance or control activities)						Y
63.7743(a)(5)	Continuous compliance demonstration for existing pouring station	Maintaining the average limits: PM 0.010 gr/dscf; or	63.7740(b)	Bag leak detector C	Once every six months	Y	Y

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S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-63 Baghouse #4, ~~and~~ A-21 Baghouse #5, and A-68 Baghouse #6

Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
		0.0008 gr/dscf of total metal HAP	63.7740 (c)	Baghouse inspection P/varies			
			63.7731(a); 63.7743(a)(12)	Source Test P/Every 5 years			
63.7743(a)(12)	Continuous compliance demonstration - subsequent performance tests for PM	PM or total metal HAP: 63.7690(a)(5)	63.7731(a)	Source Test P/Every 5 years	Every 5 years	Y	Y
63.7743(c)	Continuous compliance demonstration - baghouse			Inspections P/varies	Once every six months	Y	Y
63.7745(a)(1)	Continuous compliance demonstration – operation and maintenance requirements			Inspections, corrective action, record keeping P/M	Once every six months	Y	Y
63.7745	Igniting gasses from mold vents		63.7710(b)(6)	P/E			Y
63.7745(a)(2)	Continuous compliance demonstration – Preventative maintenance			Record keeping P/E	Once every six months	Y	Y

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S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-63 Baghouse #4, ~~and~~ A-21 Baghouse #5, and A-68 Baghouse #6

Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
63.7745(a)(3)	Continuous compliance demonstration – bag leak detection system			Record keeping P/E	Once every six months	Y	Y
63.7745(a)(4)	Continuous compliance demonstration – baghouse corrective action			Record keeping P/E	Once every six months	Y	Y
63.7745(b)	Maintain operation and maintenance plan onsite						Y
63.7746(a)	Deviations	Report deviations from emissions limitations, work practice standards, and operation and maintenance requirements, including startup, shutdown, malfunction	63.7746(a)	Record keeping P/E	Once every six months	Y	Y
63.7746(b)	Startup, shutdown, malfunction deviations are not violations						Y
63.7750	Notification requirements						Y
63.7751	Reporting requirements						Y
63.7752	Recordkeeping requirements						Y
63.7753	Recordkeeping requirements (5 years)						Y
63.7760	Table 1: Applicability of General Provisions (Subpart A)						Y
63.7761	Delegation						Y
63.7765	Definitions						Y

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S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-63 Baghouse #4, ~~and~~ A-21 Baghouse #5, and A-68 Baghouse #6

Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
BAAQMD Condition #23650							
Part 1	Abatement requirement with A-14 Baghouse #2, A-63 Baghouse #4 ~~and~~ A-21 Baghouse #5, and A-68 Baghouse #6 (basis: Cumulative Increase)						Y
Part 4	A-21 Baghouse #5, A-63 Baghouse #4, and A-68 Baghouse #6 outlet grain loading limit (basis: cumulative increase)	FILTERABLE PARTICULATE 0.01 gr/dscf	CAM Condition #25039, Part 13	Bag leak detector C	Once every six months	Y	Y
Part 6	Recordkeeping requirement (basis: Regulation 2-1-403)						Y
Part 7	Source test requirement for VOC every 5 years (basis: Regulation 2-1-403)						Y
Part 8	Iron cast in sand molds facility limit (Basis: Cumulative Increase)	Iron casting ≤ 36,000 tons/any consecutive 12-month period	BAAQMD Condition #2237, Part 6	Record keeping P/M	Once every six months	Y	Y
CAM Condition #25039							
For A-14 and A-63							
Part 1	Definition of exceedance: OPACITY Ringelmann 1.0 < 3 min/hr (Basis: 40 CFR Part 64.6(c)(2))						Y

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S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-63 Baghouse #4, ~~and~~ A-21 Baghouse #5, and A-68 Baghouse #6

Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 2	Definitions of excursion: i) any visible emissions (M22); or iii) Pressure drop less than 2 inches or greater than 10 inches water column (Basis: 40 CFR Part 64.6(c)(2))						Y
Part 3	Pressure gauge installation requirement (Basis: 40 CFR Part 64.6(c)(1))						Y
Part 4	Indicator range for pressure gauges: 2 to 10 inches of water column (40 CFR Part 64.3(a)(2))						Y
Part 5	Pressure gauge reading - Daily (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))						Y
Part 6	Pressure gauge calibration (Basis: 40 CFR Part 64.3(b)(3) and (b)(2))						Y
Part 7	Procedures for excursion (Basis: 40 CFR Parts 64.6(c)(3), 64.7(d)(2), 64.8)						Y
Part 8	Method 9 observation requirement after 2 or more excursions at the same abatement device occur within 2 weeks (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))						Y

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S-2 Pouring, Cooling, Shakeout abated by A-14 Baghouse #2, A-63 Baghouse #4, ~~and~~ A-21 Baghouse #5, and A-68 Baghouse #6

Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 9a	Reporting requirement – excursions, exceedances (Basis: 40 CFR Part 64.6(c)(3) and 40 CFR Part 64.9(a)(2))						Y
Part 9b	Reporting requirement – monitor downtime incidents (Basis: 40 CFR Part 64.6(c)(3) and 40 CFR Part 64.9(a)(2))						Y
Part 10	Inspection of baghouse (Basis: 40 CFR Part 64.6(c)(1)(iii))						Y
Part 11	Source test for compliance with SIP Regulation 6, sections 301, 310 and 311 – every 5 years (Basis: Regulation 2-1-403)						Y
Part 12	Recordkeeping requirements (Basis: Regulation 2-6-501 Recordkeeping)						Y
Part 13	Operation and Maintenance Plan (non-NESHAP) requirement (Basis: 40 CFR Part 64.6(c)(1)(iii))						Y
For A-21, A-63 and A-68							
Part 14a	Definition of exceedance: OPACITY Ringelmann 1.0 < 3 min/hr(Basis: 40 CFR Part 64.6(c)(2))						Y

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Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 14b	Definitions of excursion: i) 10 milligrams PM/actual cubic meter for 15 min; or ii) Pressure drop less than 2 inches or greater than 10 inches water column (Basis: 40 CFR Part 64.6(c)(2))						Y
Part 15	Bag leak detector requirement (Basis: 40 CFR Part 64.6(c)(1); 40 CFR Part 64.6(c)(3))						Y
Part 16	Bag leak detector alarm requirement (Basis: 40 CFR Part 64.6(c)(1))						Y
Part 17	Indicator range: PM<10 milligrams/actual cubic meter (Basis: 40 CFR Part 64.3(a)(2)						Y
Part 18	Visual inspection and testing requirement for bag leak detection sensors (Basis: 40 CFR Part 64.3(b)(3) and (b)(2))						Y
Part 19	Pressure gauge installation requirement (Basis: 40 CFR Part 64.6(c)(1))						Y
Part 20	Indicator range for pressure gauges: 2 to 10 inches of water column(40 CFR Part 64.3(a)(2))						Y

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Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements
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Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 21	Pressure gauge reading - Daily (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))						Y
Part 22	Pressure gauge calibration – quarterly(Basis: 40 CFR Part 64.3(b)(3) and (b)(2))						Y
Part 23	Procedures for excursion (Basis: 40 CFR Parts 64.6(c)(3), 64.7(d)(2), 64.8)						Y
Part 24	Method 9 observation requirement after 2 or more excursions at the same abatement device occur within 2 weeks (Basis: 40 CFR Part 64.6(c)(3); 40 CFR Part 64.3(b)(4)(iii))						Y
Part 25a	Reporting requirement – excursions, exceedances (Basis: 40 CFR Part 64.6(c)(3) and 40 CFR Part 64.9(a)(2))						Y
Part 25b	Reporting requirement – monitor downtime incidents(Basis: 40 CFR Part 64.6(c)(3) and 40 CFR Part 64.9(a)(2))						Y
Part 26	Inspection of baghouse and monitoring system (Basis: 40 CFR Part 64.6(c)(1)(iii))						Y
Part 27	Source test for PM and opacity – every 5 years (Basis: Regulation 2-1-403)						Y

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Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R*	FE
Part 28	Recordkeeping requirements (Basis: Regulation 2-6-501 Recordkeeping)						Y