

**MORE
THAN
JUST
PIPE.**



UNITED STATES PIPE AND FOUNDRY COMPANY, LLC

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

RECEIVED

January 25, 2012

2012 JAN 27 AM 11 50

BAY AREA AIR QUALITY
MANAGEMENT DISTRICT

Bay Area Air Quality Management District
Director of Enforcement
939 Ellis Street
San Francisco, CA 94109

Subject: Title V Monitoring Report – Facility #A0083

Dear Mr. Kelly Wee:

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 July 1 through December 31, 2011:

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 black ink, appearing to read "D. A. Hiestand", written over a horizontal line.

David A. Hiestand
Plant Manager

DAH: dma

cc: D.M. Araya, Environmental Coordinator

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

**Applicable Limits and Compliance Monitoring Requirements
Table VII-A
S-1 Cupola**

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AAW/RES/ECV
AIR QUALITY DISTRICT

Citation of Limit	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance		
						Yes	No	
Opacity	BAAQMD 6-301	Y	Ringelmann No. 1 for less than 3 minutes in any hour	BAAQMD cond #2274, Parts 4 and 5	C	temperature monitor, pressure drop monitor	Y	
	BAAQMD 6-301	Y	Ringelmann No. 1 for less than 3 minutes in any hour	BAAQMD Cond #2274, Part 8	P/D	preventative maintenance records	Y	
	BAAQMD 6-301	Y	Ringelmann No. 1 for less than 3 minutes in any hour	BAAQMD Cond #2274, Part 8	P/W	Visible emission monitoring	Y	
PM	BAAQMD 6-305	Y	Fallout of visible particles	BAAQMD cond #2274, Parts 4 and 5	C	temperature monitor, pressure drop monitor	Y	
FP	BAAQMD 6-310	Y	0.15 gr/dscf	BAAQMD cond #2274, Parts 4 and 5	C	temperature monitor, pressure drop monitor	Y	
FP	BAAQMD 6-311	Y	40 lb/hr	BAAQMD cond #2274, Parts 4 and 5	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	

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

**Applicable Limits and Compliance Monitoring Requirements
Table VII-A
S-1 Cupola**

Type of Limit	Citation of Limit	FF Y/ N	Future- Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
	BAAQMD 9-1-302	Y		sulfur emissions not to exceed 300 ppm, dry	BAAQMD condition #2274, part 7	P/E 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/B	Fuel certification	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	
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	BAAQMD Condition #2274, part 3	Y		1550oF	BAAQMD condition 2274, part 5	C	Continuous Temperature monitor	Y	

¹ Ground Level Concentration

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

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 6-301	Y		Ringelmann No. 1 for less than 3 minutes in any hour	BAAQMD cond #1783, Part 5	C	pressure drop monitor	Y	
	BAAQMD 6-301	Y		Ringelmann No. 1 for less than 3 minutes in any hour	BAAQMD Cond #1783, Part 6	P/W	preventative maintenance records	Y	
	BAAQMD 6-301	Y		Ringelmann No. 1 for less than 3 minutes in any hour	BAAQMD Cond #1783, Part 7	P/W	Visible emission monitoring	Y	
PM	BAAQMD 6-305	Y		Fallout of visible particles	BAAQMD cond #1783, Part 3	C	Pressure drop monitor	Y	
FP	BAAQMD 6-310	Y		0.15 gr/dscf	BAAQMD cond #1783, Part 3	C	Pressure drop monitor	Y	
FI	BAAQMD 6-311	Y		40 lb/hr	BAAQMD cond #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 500 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**

**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
Bag cleaning or replacement	BAAQMD Condition #1783, part 5	Y		Bag cleaning or replacement required when pressure drop exceeds 6 inches water column	BAAQMD Condition #1783, part 3	C	Pressure drop monitor	Y	

¹Ground Level Concentration.

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

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 6-301	Y		Ringelmann No.1 for less than 3 minutes in any hour	BAAQMD cond #14989, Part 1	P/D	preventative maintenance records	Y	
	BAAQMD 6-301	Y		Ringelmann No.1 for less than 3 minutes in any hour	BAAQMD Cond #14989, Part 2	P/W	Visible emission monitoring	Y	
	BAAQMD 6-305	Y		Fallout of visible particles		N		Y	
	BAAQMD 6-310	Y		0.15 gr/dscf		N		Y	
	BAAQMD 6-311	Y		40 lb/hr		N		Y	

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

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 6-301	Y		Ringelmann No. 1 for less than 3 minutes in any hour	BAAQMD cond #2212, Part 3	C	pressure drop monitor	Y	
	BAAQMD 6-301	Y		Ringelmann No. 1 for less than 3 minutes in any hour	BAAQMD Cond #2212, Part 4	P/W	Visible emission monitoring	Y	
PM	BAAQMD 6-305	Y		Fallout of visible particles	BAAQMD cond #2212, Part 3	C	pressure drop monitor	Y	
FP	BAAQMD 6-310	Y		0.15 gr/dscf	BAAQMD cond #2212, Part 3	C	pressure drop monitor	Y	
	BAAQMD 6-311	Y		40 lbs/hr	BAAQMD cond #2212, Part 3	C	pressure drop monitor	Y	
Bag cleaning or replacement	BAAQMD Condition #2212, part 2	Y		Bag cleaning or replacement required when pressure drop exceeds 6 inches 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**

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 6-301	Y		Ringelmann No.1 for less than 3 minutes in any hour	BAAQMD cond #14990, Part 1	PM	Visible emission monitoring	Y	
PM	BAAQMD 6-305	Y		Fallout of visible particles		N		Y	
FP ¹	BAAQMD 6-310	Y		0.15 gr/dscf		N		Y	
FP	BAAQMD 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**

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 6-301	Y		Ringelmann No. 1 for less than 3 minutes in any hour	BAAQMD cond #14991, Part 1	P/M	Visible emission monitoring	Y	
PM	BAAQMD 6-305	Y		Fallout of visible particles		N		Y	
FP	BAAQMD 6-310	Y		0.15 g/dscf		N		Y	
	BAAQMD 6-311	Y		40 lb/hr		N		Y	

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

Applicable Limits and Compliance Monitoring Requirements

**Table VII-G
S-17 Surface Coater**

Type of Limit	Citation of Limit	FF 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**

Applicable Limits and Compliance Monitoring Requirements

**Table VII-H
S-32 Pneumatic Dust 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 6-301	Y		Ringelmann No.1 for less than 3 minutes in any hour		N		N/A*	
PM	BAAQMD 6-505	Y		Fallout of visible particles		N		N/A*	
FP	BAAQMD 6-310	Y		0.15 gr/dscf		N		N/A*	
	BAAQMD 6-311	Y		40 lb/hr		N		N/A*	
FP	BAAQMD Condition #2676, part 3	Y		grain loading from A-19 Baghouse not to exceed 0.10 gr/dscf		N		N/A*	
Lead	BAAQMD 11-1-301	Y		15 lb/day		N		N/A*	
	BAAQMD 11-1-302	Y		GLC ¹ not to exceed 1.0 ug/m ³ averaged over 24 hrs		N		N/A*	
Hours of operation	BAAQMD Condition #2676, part 2	Y		11 hours per day	BAAQMD Condition #2676, part 5	P	Operating records	N/A*	

¹ Ground Level Concentration

*** Note: S-32 Pneumatic Dust Transport System has not been used during this reporting period.**

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

Applicable Limits and Compliance Monitoring Requirements

**Table VII-I
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	HAAQMD 8-7-301.10	N		minimum vapor recovery efficiency of lesser of 98% or CARD-certified efficiency for new or modified systems	BAAQMD Condition #18432, part 2	I/A	Source Test	Y	
	BAAQMD Regulation 8-7-313.1	N		Fugitives \leq 0.42 lb/1000 gallon		N		Y	
	HAAQMD Regulation 8-7-313.2	N		Spillage \leq 0.42 lb/1000 gallon		N		Y	
	BAAQMD Regulation 8-7-313.3	N		Liquid Retain + Spitting \leq 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**

Applicable Limits and Compliance Monitoring Requirements

**Table VII-J
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 (Y/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 1	Y		25 tons per 12-month period or 900 lbs per calendar day	BAAQMD Condition 13321, part 3	P/D	records	N/A*	

**Table VII-K
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 (Y/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		5 tons per 12-month period or 1000 lbs per calendar day	BAAQMD Condition 13321, part 6	P/D	records	N/A*	

* Note: S-40 Portable Abrasive Blasting Unit #1 has not been used during this reporting period.

* 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**

Applicable Limits and Compliance Monitoring Requirements

**Table VII-I.
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 (Y/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 one Cold Cleaner (S-42) has not been used during this reporting period.

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

Applicable Limits and Compliance Monitoring Requirements

**Table VII - M
S-51 STANDBY GENERATOR DIESEL ENGINE
S-52 STANDBY GENERATOR DIESEL ENGINE**

<u>Type of Limit</u>	<u>Citation of Limit</u>	<u>FE Y/N</u>	<u>Future Effective Date</u>	<u>Limit</u>	<u>Monitoring Requirement Citation</u>	<u>Monitoring Frequency (R/C/N)</u>	<u>Monitoring Type</u>	<u>Compliance</u>	
								<u>Yes</u>	<u>No</u>
<u>Opacity</u>	<u>BAAQMD 6-303.1</u>	<u>Y</u>		<u>> Ringelmann No. 2 for no more than 3 minutes in any hour</u>		<u>N</u>		<u>N/A*</u>	
<u>FP</u>	<u>BAAQMD 6-310</u>	<u>Y</u>		<u>0.15 grain/dscf</u>		<u>N</u>		<u>N/A*</u>	
	<u>BAAQMD 6-310.3</u>	<u>Y</u>		<u>0.15 grain/dscf @ 6% O2</u>		<u>N</u>		<u>N/A*</u>	
<u>SO2</u>	<u>BAAQMD 9-1-301</u>	<u>Y</u>		<u>GLC¹ of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours</u>	<u>BAAQMD Condition #20974, part 1</u>	<u>P/M</u>	<u>Fuel Certification Records</u>	<u>N/A*</u>	
	<u>BAAQMD 9-1-304</u>	<u>Y</u>		<u>sulfur emissions not to exceed 300 ppm, dry</u>	<u>BAAQMD Condition #20974, part 1</u>	<u>P/M</u>	<u>Fuel Certification Records</u>	<u>N/A*</u>	
<u>Operating hours</u>	<u>BAAQMD 9-8-330</u>	<u>Y</u>		<u>100 hours of reliability-related operation per calendar year</u>	<u>BAAQMD Regulation 9-8-530</u>	<u>P/M</u>	<u>Records of operation</u>	<u>N/A*</u>	

*** Note: Emergency Generators (S-51 & S-52) have 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

January 25, 2012

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 (NESHAAP) for Iron and Steel Foundries Area Sources. The following summary is provided for the Semi-Annual Compliance Report for the reporting period **July 1 through December 31, 2011:**

- **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 did not meet the July 1, 2011 due date for the Performance testing to demonstrate initial compliance with Applicable Emissions and Opacity Limits according to section 63.10898 because of the installation of a new metal melting emissions control device (Cupola baghouse). To assure long term compliance with Subpart ZZZZZ, US Pipe installed a new Cupola baghouse at a cost of about \$4 Million. The new baghouse installation project required California CEQA review and BAAQMD permitting and these agencies were informed and aware of the project timing.*

Mr. Doug McDaniel
January 25, 2012
Page 2

The Performance testing was done on January 18, 23 & 24, 2012. Test results will be submitted to EPA and BAAQMD within 60 days of the Performance testing date.

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. Dion Arza at 510-441-5865.

Sincerely,

UNITED STATES PIPE AND FOUNDRY COMPANY, LLC



David Hiestand
Plant Manager

Cc: Mr. Kelly Wee - Compliance Director, Bay Area Air Quality Management District