

Title V Permit Evaluation

Site Number: A0062

Application Number: 25865

Site Name: American Brass & Iron Foundry

Reviewing Engineer: DTJ

Site Address: 7825 San Leandro Street, Oakland, CA 94621

Periodic Monitoring:

Summary Tables

TSP Sources

S# & Description	Federally Enforceable Emission Limit Citation	Federally Enforceable Emission Limit	Potential to Emit: tpy	Monitoring
S-1 Cupola (coke)	BAAQMD 6-301	Ringelmann No.1	N/A	1. Preventive maintenance records; periodic, weekly (proposed) 2. Visible Emission Evaluation; periodic, weekly (proposed)
	BAAQMD 6-310	0.15 grain/dscf	N/A	Preventive maintenance records; periodic, weekly (proposed)
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight in ton/hr	N/A	Preventive maintenance records; periodic, weekly (proposed)
S-2 Vibrating Tubular Shakeout	BAAQMD 6-301	Ringelmann No.1	N/A	1. Preventive maintenance records; periodic, weekly (proposed) 2. Visible Emission Evaluation; periodic, weekly (proposed)
	BAAQMD 6-310	0.15 grain/dscf	N/A	Preventive maintenance records; periodic, weekly (proposed)
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight in ton/hr	N/A	Preventive maintenance records; periodic, weekly (proposed)

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S-3 Sand Muller	BAAQMD 6-301	Ringelmann No.1	N/A	1. Preventive maintenance records; periodic, weekly (proposed) 2. Visible Emission Evaluation; periodic, weekly (proposed)
	BAAQMD 6-310	0.15 grain/dscf	N/A	Preventive maintenance records; periodic, weekly (proposed)
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight in ton/hr	N/A	Preventive maintenance records; periodic, weekly (proposed)
S-4 Shot Blast Cleaning Machine	BAAQMD 6-301	Ringelmann No.1	N/A	1. Preventive maintenance records; periodic, weekly (proposed) 2. Visible Emission Evaluation; periodic, weekly (proposed)
	BAAQMD 6-310	0.15 grain/dscf	NA	Preventive maintenance records; periodic, weekly (proposed)
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight in ton/hr	N/A	Preventive maintenance records; periodic, weekly (proposed)
S-5 Shot Blast Cleaning Machine	BAAQMD 6-301	Ringelmann No.1	N/A	1. Preventive maintenance records; periodic, weekly (proposed) 2. Visible Emission Evaluation; periodic, weekly (proposed)
	BAAQMD 6-310	0.15 grain/dscf	N/A	Preventive maintenance records; periodic, weekly (proposed)
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight in ton/hr	N/A	Preventive maintenance records; periodic, weekly (proposed)

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S# & Description	Federally Enforceable Emission Limit Citation	Federally Enforceable Emission Limit	Potential to Emit: tpy	Monitoring
S-21 Sand Cooler	BAAQMD 6-301	Ringelmann No.1	N/A	1. Preventive maintenance records; periodic, weekly (proposed) 2. Visible Emission Evaluation; periodic, weekly (proposed)
	BAAQMD 6-310	0.15 grain/dscf	N/A	Preventive maintenance records; periodic, weekly (proposed)
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight in ton/hr	N/A	Preventive maintenance records; periodic, weekly (proposed)
S-25 Holding Furnace	BAAQMD 6-301	Ringelmann No.1	N/A	1. Preventive maintenance records; periodic, weekly (proposed) 2. Visible Emission Evaluation; periodic, weekly (proposed)
	BAAQMD 6-310	0.15 grain/dscf	N/A	Preventive maintenance records; periodic, weekly (proposed)
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight in ton/hr	N/A	Preventive maintenance records; periodic, weekly (proposed)
S-27 Shot Blast Machine	BAAQMD 6-301	Ringelmann No.1	N/A	1. Preventive maintenance records; periodic, weekly (proposed) 2. Visible Emission Evaluation; periodic, weekly (proposed)
	BAAQMD 6-310	0.15 grain/dscf	N/A	Preventive maintenance records; periodic, weekly (proposed)
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight in ton/hr	N/A	Preventive maintenance records; periodic, weekly (proposed)

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S# & Description	Federally Enforceable Emission Limit Citation	Federally Enforceable Emission Limit	Potential to Emit: tpy	Monitoring
S-28 Storage Silo	BAAQMD 6-301	Ringelmann No.1	N/A	<ol style="list-style-type: none"> 1. Preventive maintenance records; periodic, weekly (proposed) 2. Visible Emission Evaluation; periodic, weekly (proposed) 3. Pressure Drop Monitoring; periodic, weekly
	BAAQMD 6-310	0.15 grain/dscf	N/A	Preventive maintenance records; periodic, weekly (proposed)
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight in ton/hr	N/A	Preventive maintenance records; periodic, weekly (proposed)

Discussion

All of the particulate sources listed above are abated by baghouses that should never exhibit visible emissions under normal operating conditions. Therefore, records of baghouse preventive maintenance activities and periodic visual evaluation of each baghouse exhaust are sufficient to insure ongoing compliance with the Ringelmann No. 1 limitation.

Under normal operating conditions, all baghouses should comply with the grain loading emission standard of 0.15 gr/dscf. Violations of this standard would only occur during a failure of a filter bag. Therefore, records of baghouse preventive maintenance activities are sufficient to insure ongoing compliance with this emission standard.

Under normal operating conditions, all baghouses should comply with the mass emission rate standard of Regulation 6-311. Violations of this standard would only occur during a failure of a filter bag. Therefore, records of baghouse preventive maintenance activities are sufficient to insure ongoing compliance with this emission standard.

SO₂ Sources

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S# & Description	Federally Enforceable Emission Limit Citation	Federally Enforceable Emission Limit	Potential to Emit: tpy	Monitoring
S-1 Cupola (coke-fired)	BAAQMD 9-1-302	300 ppmv (dry)	11.3	Sulfur Content of Coke; periodic, event basis (proposed)

Discussion

Because the SO₂ emissions from S-1 are a function of the sulfur content of the coke burned at S-1, periodic testing of coke sulfur content is deemed sufficient to insure compliance with the applicable SO₂ emission limit. Furthermore, BAAQMD source testing has demonstrated that the SO₂ emission rate from the cupola stack should be well below 300 ppmvd, even if the coke fired has the maximum allowable sulfur content of 1 percent by weight.

POC Sources

S# & Description	Federally Enforceable Emission Limit Citation	Federally Enforceable Emission Limit	Potential to Emit: tpy	Monitoring
S-13 Coating Dip Tank	BAAQMD 8-19-302	Coating VOC Content Limit of 2.8 lb/gal	50	Coating Records (existing)
S-26 Stencil Coating Wheel	BAAQMD 8-4-302.1	5 ton/year	1	Coating Records (existing)
S-23 Coating Storage Tank	BAAQMD Permit Condition #6575, part 1	Coating throughput limit of 110,000 gallons per year	0.02	Material Throughput Records (existing)
S-24 Solvent Storage Tank	BAAQMD Permit Condition #6575, part 3	Solvent throughput limit of 20,000 gallons per year	0.2	Material Throughput Records (existing)

Discussion

Because the POC emissions from S-13 and S-26 are solely based upon the quantity of coating consumed at those sources, records of coating usage are deemed sufficient to insure compliance with applicable POC emission limits.

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Because the POC emissions from S-23 and S-24 are solely a function of the throughput of materials stored at those sources, records of material throughput are deemed sufficient to insure compliance with applicable POC emission limits.

Throughput limit

Compliance with all throughput limits will be assured by recordkeeping.

Permit Shield:

No permit shield was requested.

Alternate Operating Scenario:

No alternate operating scenarios were requested.

Compliance Status:

See attached Compliance Review Memorandum dated 12/21/00.

Alignment of Information in Application and Proposed Permit:

There are no discrepancies between the content of the application and the proposed permit.