Emissions Minimization Plan

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

USS-POSCO Industries
District Site #2371
900 Loveridge Road
Pittsburg, CA 94565

Table of Contents

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:* 10/29/14

Freddy Ripoli, Environmental Health and Safety Manager

Responsible Manager

Designation of Confidential Business Information

Describe the information you designate as "CONFIDENTIAL" that are 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

The USS-POSCO Industries (UPI) steel finishing plant is owned and operated by USS-POSCO Industries (UPI), a joint venture company established by U.S. Steel Corporation and POSCO, of the Republic of Korea.

UPI is a flat-rolled steel fininshing facility that converts hot bands to cold rolled and galvanized sheet, and tinplate product. Production processes include pickling, cold rolling, cleaning, annealing, hot-dip galvanizing, temper rolling, side-trimming, and electrolytic tin and Cr/CrO coating. Hot bands are received by ship or rail, and finished product is shipped by truck or rail.

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

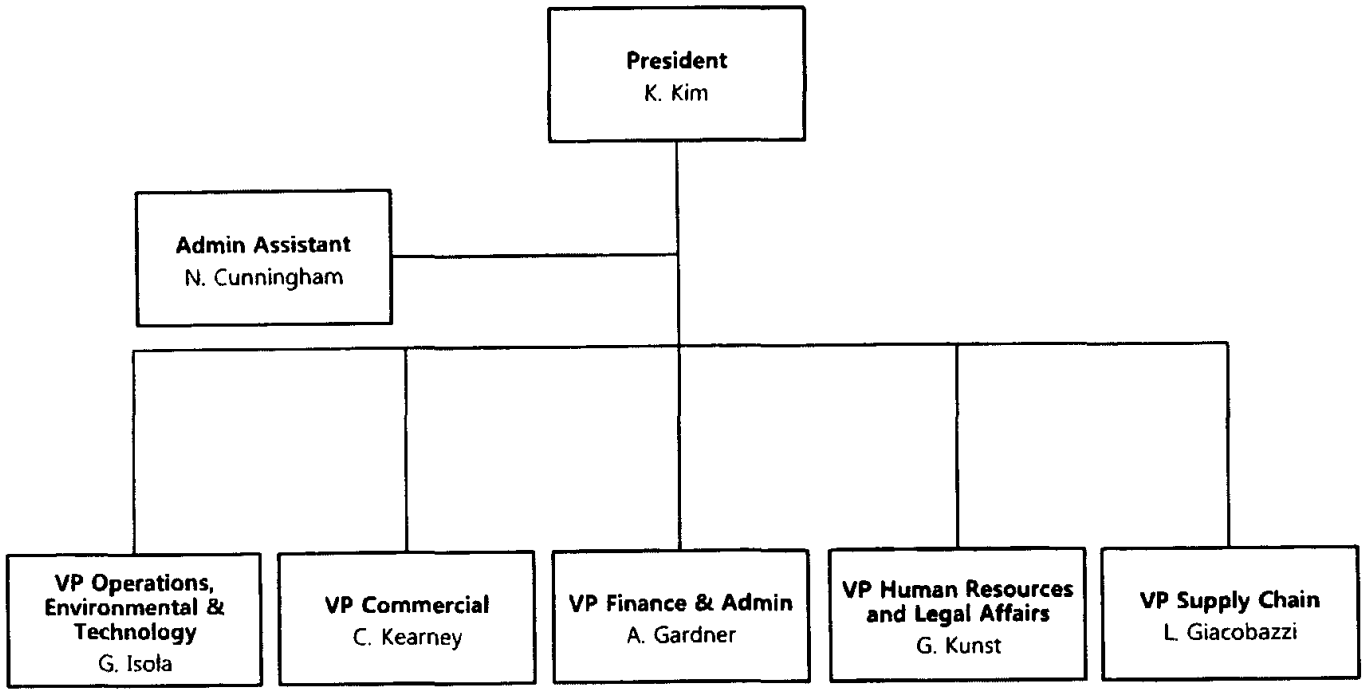
A. *Company Organizational Chart-* Attach a copy of the organizational chart of the company, which describes the business structure and includes the name of the facility's Responsible Official.

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.

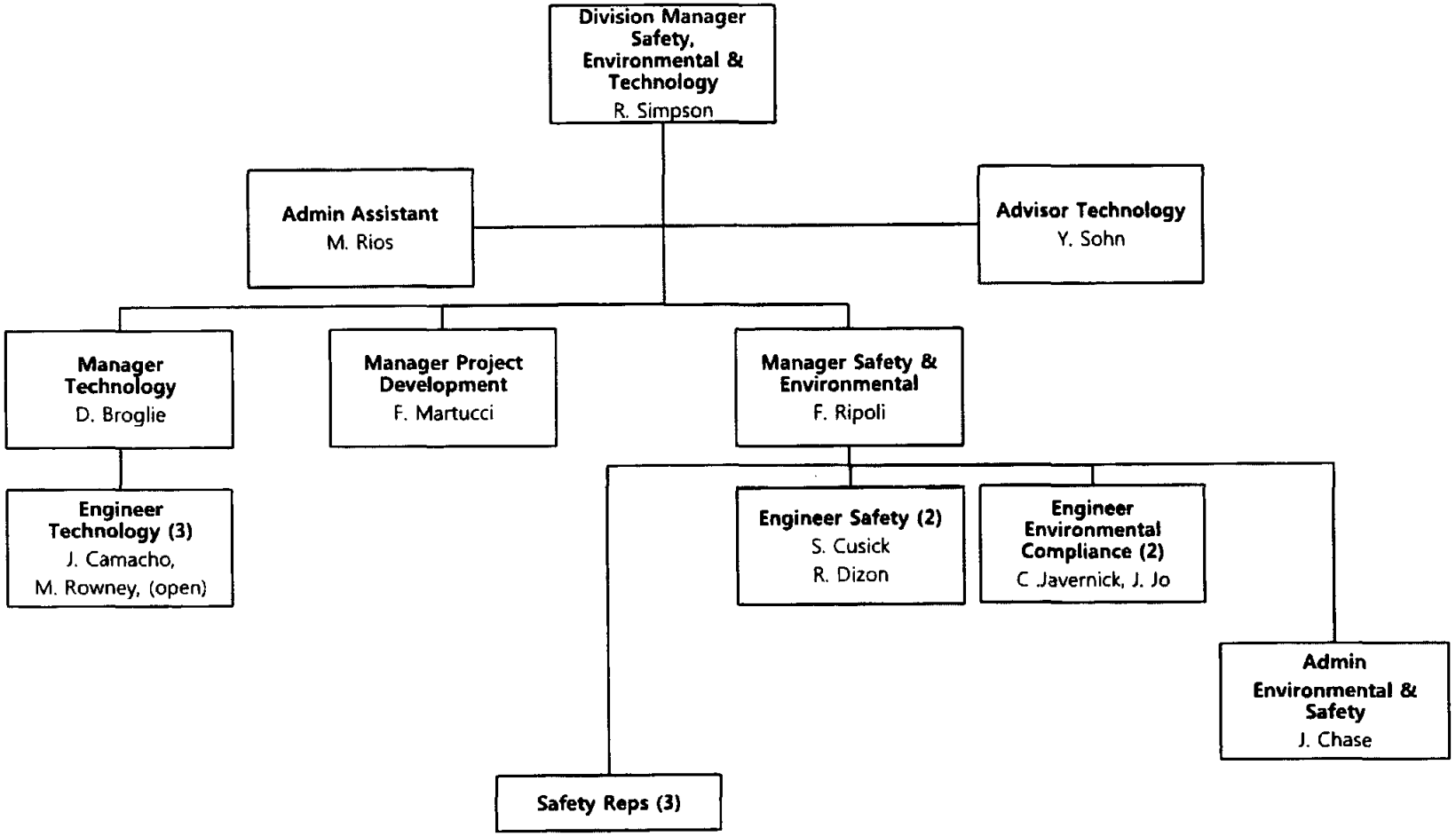
A. Company Organizational Chart

See following pages.

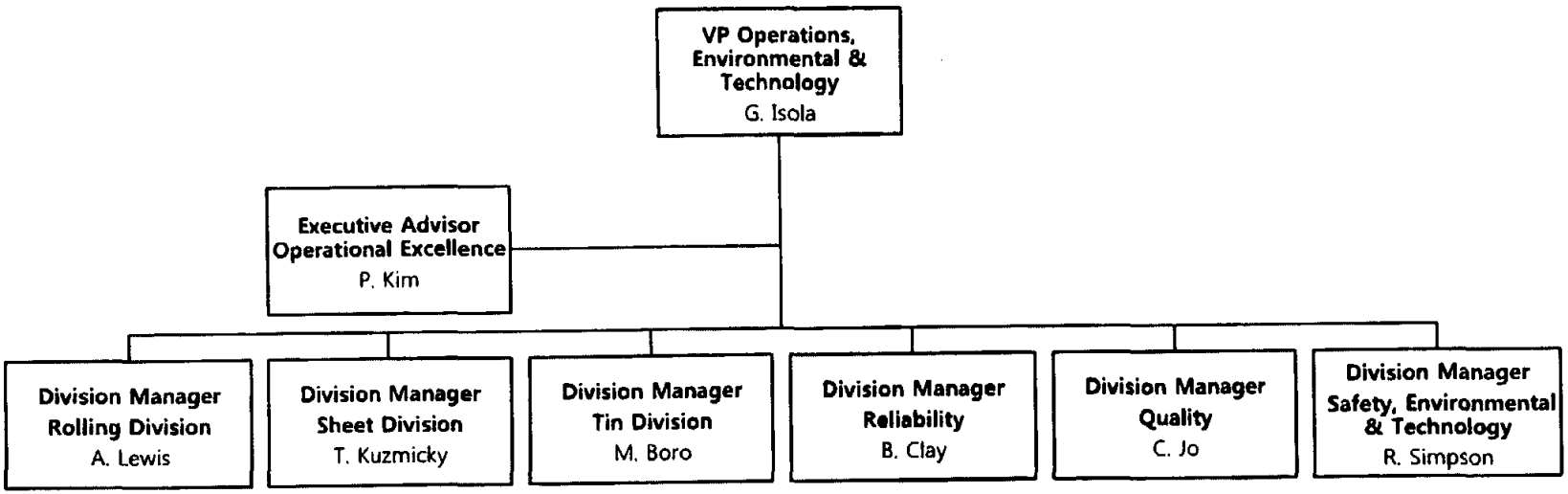
Executive Steering Team



Operations Support



Operations


VP Operations, Environmental & Technology
G. Isola
Executive Advisor Operational Excellence
P. Kim
Division Manager Rolling Division
A. Lewis
Division Manager Sheet Division
T. Kuzmicky
Division Manager Tin Division
M. Boro
Division Manager Reliability
B. Clay
Division Manager Quality
C. Jo
Division Manager Safety, Environmental & Technology
R. Simpson

B. Schedule of Management Operators

Onsite Responsible Manager(s)

Name: Rod Simpson
Title: Division Manager Operating Support
Phone: 925-439-6442
Email: rsimpson@ussposco.com
Schedule/Shift: Monday-Friday, 7-4

Name: Freddy Ripoli
Title: EH&S Manager
Phone: 925-439-6316
Email: freddyripoli@ussposco.com
Schedule/Shift: Monday-Friday, 7-4

Onsite Alternate Contact(s)

Name: Coree Javernick
Title: Environmental Compliance Engineer
Phone: 925-439-6728
Email: coreejavernick@ussposco.com
Schedule/Shift: Monday- Friday, 7-4

Name: James Jo
Title: Environmental Compliance Engineer
Phone: 925-439-6653
Email: jamesjo@ussposco.com
Schedule/Shift: Monday-Friday, 7-4

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

Contents of the EMP

12-13-403

The owner of 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 in which 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, seven 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, seven 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

			NAME OF MATERIALS USED IN MOLDING OPERATIONS					ABATEMENT					
Section #	Equipment Name and Manufacturer /Model #	District S# and Applicable NESHAPs Section	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 (%):
				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 anindividual 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	
		☐ 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 Coating 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	NOx reduction	☒ Yes ☐ No	Not to exceed 10 ppmv at 3% oxygen, averaged over 3 consecutive clock hours; Be reduced by at least a 90%, by weight, averaged over 3 consecutive clock hours, by the A32 Selective Catalytic Reduction (SCR) Unit; or For a period when UP1 is firing natural gas at a rate less than 65,000 scfh, such as when running a thin gauge coil (<0.0300 inch) or during a line stoppage, NOx shall be reduced by at least 80%, by weight, averaged over three consecutive clock hours, by the A32 Selective Catalytic Reduction (SCR) Unit. If the duration of firing natural gas at a rate less than 65,000 scfh is less than three clock hours, the averaging period shall be the entire period.
						☐ 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 sample pump diaphragms -Replacement of sample pump diaphragms -Replace oxygen analyzer fuel cell -Replace NOx analyzer chamber pumps -Control panel service routines,	-Daily -Once a year -Once a year -Once a year -Quarterly -Twice a year

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 consumption	The gas consumption is checked daily to ensure there isn't an abnormal amount of gas being used. If there was a leak or fugitive emissions, the gas consumption would increase	Daily
2	Set Combustion	The combustion technicians "set"the combustion levels to ensure the appropriate ration of air intake to fuel intake to ensure all combustion gases are being burned	Every start up
3	Regular Maintenance	All burners and furnace equipment are maintained on a weekly or monthly basis to ensure they are in optimal operating conditions with no damage or leaks	Weekly/monthly

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	
					☐ 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 - 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	
				☐ 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 - 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	
				☐ 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 making 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 Tandem Cold Mill (PLTCM)	171	Captures particulates

Technical Data

12-13-403.1

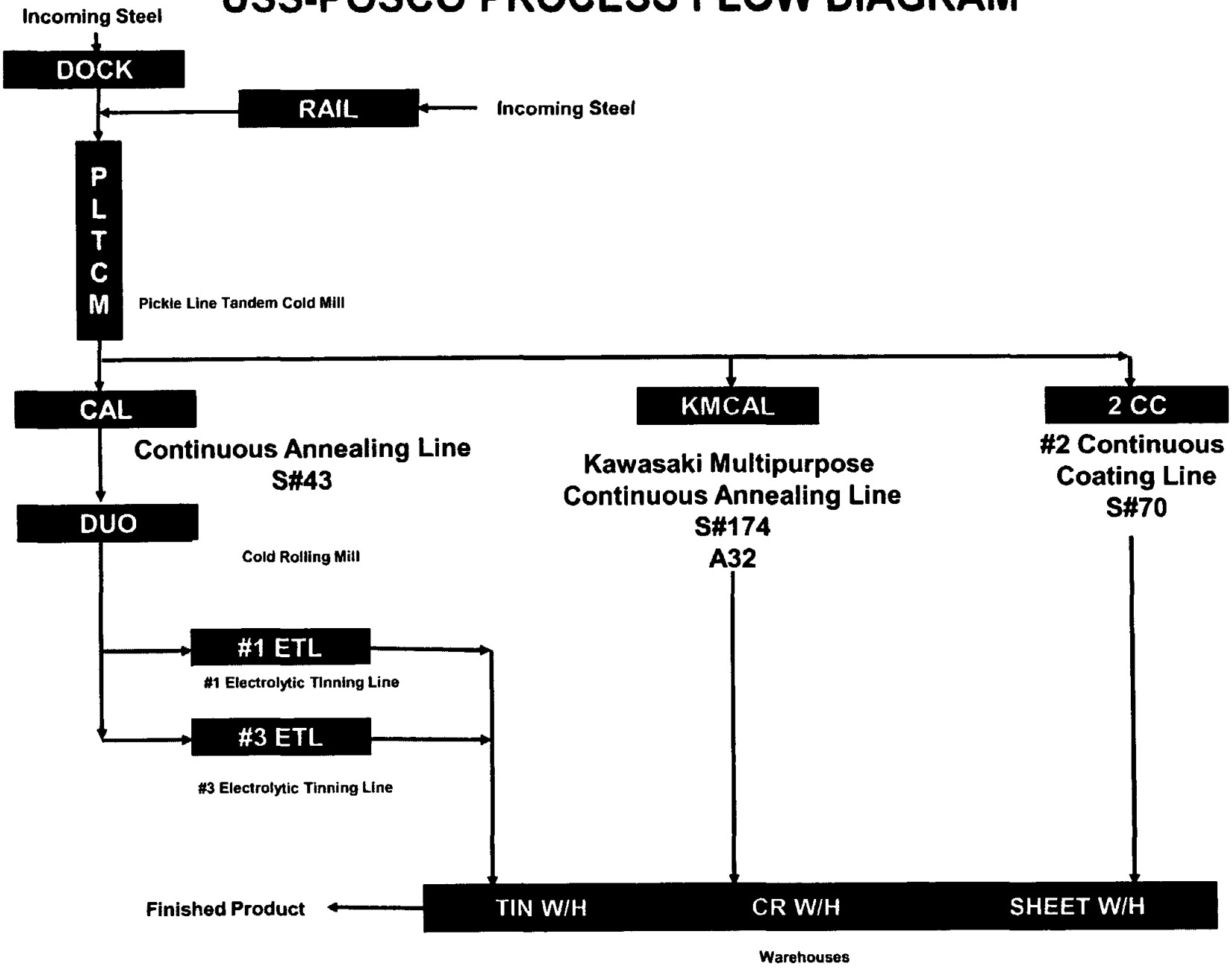
A. *Process Flow Diagram* – Facilities must indicate all operations in Section 12-13-402, the flow of materials used and identify all monitoring of processes, abatement and controls to minimize emissions beginning from material receipt to achievement of final product. Identify all abatement and control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

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.

A. Process Flow Diagram

The Process Flow Diagram can be found on the following page.

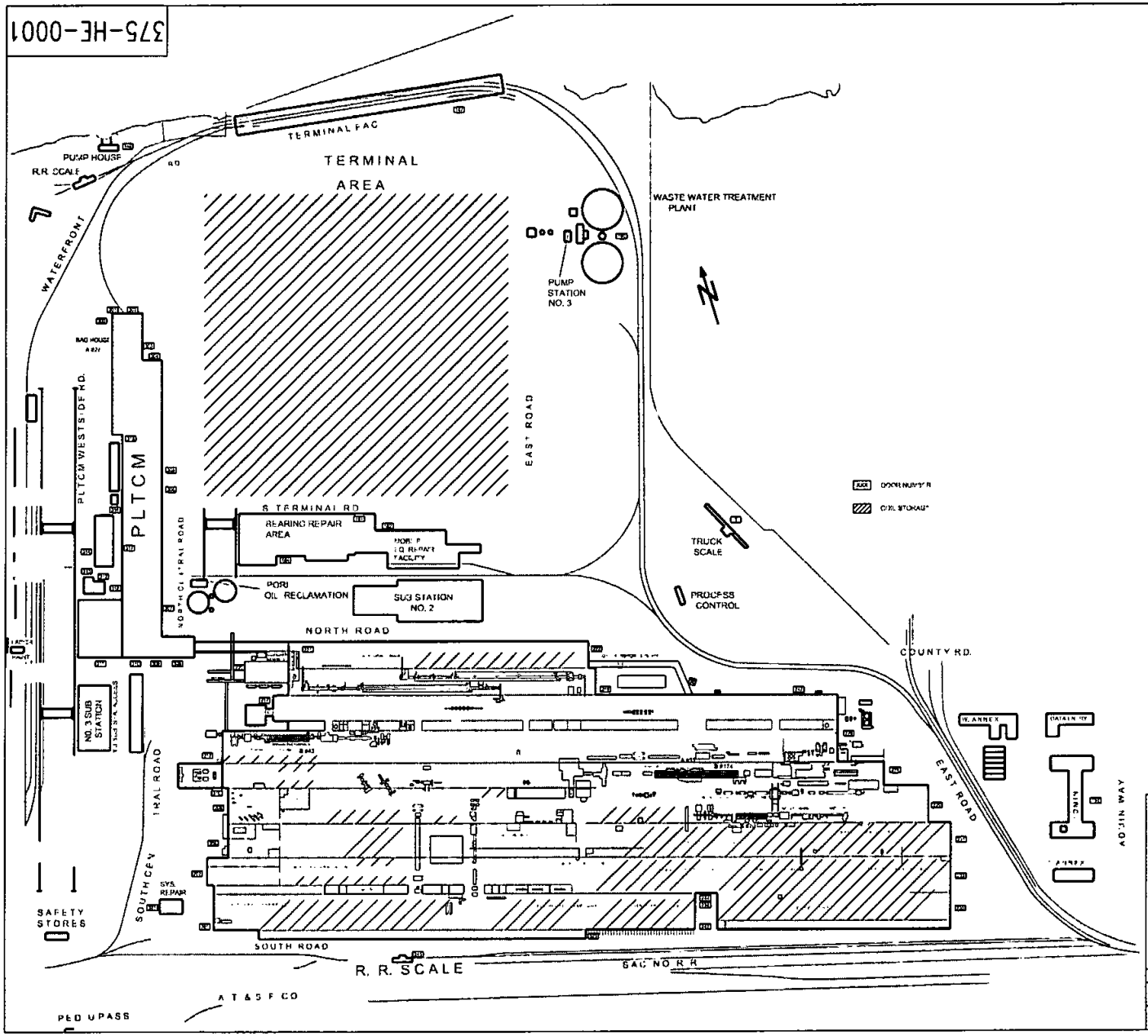
USS-POSCO PROCESS FLOW DIAGRAM



B. Facility Layout / Floor Plan

The Facility Layout can be found on the following page.

375-HE-0001



NO.	TITLE
	REFERENCES

USS-POSCO INDUSTRIES
PITTSBURG, CALIFORNIA

PLANT GENERAL ENVIRONMENTAL PERMIT BAAQMD EMISSIONS MAP

DRAWN BY	CHECKED BY	SCALE
JY		

NO	REVISIONS	BY	DATE
	SAFETY FIRST		

MANAGER ENGINEERING

DATE

375-HE-0001

Fugitive Emissions Reductions Previously Realized

12-13-403.2

Facilities must provide a description of the equipment, processes and procedures installed or implemented within the last five years to reduce fugitive emissions. Include the purpose for implementation and detail any employee training that was conducted for that equipment, process or procedure and the frequency of any ongoing training.

12-13-403.2 FUGITIVE EMISSIONS PREVIOUSLY REALIZED						
Section #	Identify Type of Operation per Section 12-13-402	Description of Equipment, Processes or Procedures Previously Realized	Implementation Date	Purpose of Implementation	Employee Training Conducted	Description of Employee Training and Frequency of Training
I	Metal Management	Baghouse	2001	To capture the particulate emissions that come off of the coils as they are unrolled to be processed	☐ Yes ☒ No	
					☐ Yes ☐ No	
					☐ Yes ☐ No	
					☐ Yes ☐ No	
					☐ Yes ☐ No	
					☐ Yes ☐ No	
					☐ Yes ☐ No	
					☐ Yes ☐ No	
					☐ Yes ☐ No	

Schedule for the Implementation of the EMP Elements

12-13-403.3

A. Provide a list of existing or current EMP elements in place pursuant to and under a District Authority to Construct as of the initial date of EMP submittal (on or before May 1, 2014). Include a description, the purpose and schedule of the element(s).

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. 12-13-403.3.1 SCHEDULE FOR THE IMPLEMENTATION OF THE EMP ELEMENTS (on or before May 1, 2014)					
Section #	Identify Type of Operation per Section 12-13-402	List Specific Elements to be Implemented on or before May 1, 2014	Implementation Date	Description of Elements to be Implemented	Purpose of Implementation

B. 12-13-403.3.2 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 EMP	Implementation Date	Description of Elements to be Implemented	Purpose of Implementation

Compliance Schedule for the EMP

12-13-405

A. *APCO Recommendations to EMP and Determination of Approvability–* Acknowledge acceptance or rejection of each of the APCO's recommendations. For each of the accepted recommendations, describe the measures to be implemented and include the date of proposed implementation. If the facility rejects a recommendation, provide a detailed basis for that rejection.

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

Date of EMP: **5/19/15**

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 #	Date of APCO Recommendation	(FOR APCO 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	(APCO USE ONLY) Implementation Verified by APCO
1	4/1/15	Pave all areas used to store or transport scrap metal to and from operations.	☐ Yes ☒ No	Due to the nature of our operations, it would not be economically feasible to pave all areas that are used to store or transport scrap metal. Furthermore, the scrap metal that is being stored and transported in non-paved areas is not emitting or contributing to any air emissions.			☒ Yes ☐ No
2	4/1/15	Consider including the pickling line as a source of fugitive emissions of odors and identify any measures or controls to minimize emissions.	☐ Yes ☒ No	The pickling line is a closed operation except for where the strip being processed enters and exits the process. It is not an odorous process. Whenever in operation, it is vented to a packed bed scrubber that utilizes a caustic solution to minimize any emissions.			☒ Yes ☐ No
3	4/1/15	Install bag break detectors and audible alarms at baghouses.	☐ Yes ☒ No	All baghouses are permitted under our Title V permit. They are visually inspected monthly to ensure they are in correct operating order.			☒ Yes ☐ No
			☐ Yes ☐ No				☐ Yes ☐ No

Appendix

If additional information are to be included in the EMP, identify the associated Appendix # as "*#*" in the text box of the specific table.

In the table below, note the Appendix # and provide the Page # and Section # of the EMP where the material references.

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