

**IOWA DEPARTMENT OF NATURAL RESOURCES
ADMINISTRATIVE CONSENT ORDER**

IN THE MATTER OF:

**GRIFFIN PIPE PRODUCTS CO.,
LLC**

Pottawattamie County, Iowa

ADMINISTRATIVE CONSENT
ORDER

NO. 2015-AQ- 02

TO: Griffin Pipe Products Co., LLC
2601 9th Avenue
Council Bluffs, IA 51501

CT Corporation System, Registered Agent
500 East Court Avenue
Des Moines, Iowa 50309

I. SUMMARY

This administrative consent order is entered into between Griffin Pipe Products Co., LLC (Griffin Pipe) and the Iowa Department of Natural Resources (DNR) for the purpose of addressing monitored lead concentrations in Council Bluffs, Iowa, that do not meet the lead National Ambient Air Quality Standards (NAAQS). This administrative consent order shall create enforceable control measures for Griffin Pipe to meet requirements of the State Implementation Plan (SIP) for the lead nonattainment area in Council Bluffs, Iowa. This administrative consent order establishes time schedules for completion of such control measures. The parties have agreed to the provisions below.

Questions regarding this administrative consent order should be directed to:

Anne Preziosi, Attorney
DNR – Legal Services
7900 Hickman Road, Suite 1
Windsor Heights, Iowa 50324
(515) 725-9551

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II. JURISDICTION

The administrative consent order is issued pursuant to the provisions of Iowa Code sections 455B.134(9) and 455B.138(1) which authorize the Director to issue orders necessary to secure compliance with or prevent a violation of Iowa Code chapter 455B, Division II, and the rules promulgated or permits pursuant thereto, and to prevent, abate, and control air pollution.

III. STATEMENT OF FACTS

1. Griffin Pipe owns a ductile iron foundry located in Council Bluffs, Iowa (the “Facility”). Griffin Pipe manufactures ductile iron pressure pipe for potable water transmission and wastewater collection.

2. On November 12, 2008, EPA published in the Federal Register (73 FR 66964) a final rule that lowered the level of the lead NAAQS from 1.5 to 0.15 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) of air. The revised standard requires that the maximum monitored 3-month rolling average not exceed 0.15 $\mu\text{g}/\text{m}^3$. DNR adopted the revised lead NAAQS in 2009 and the adoption became effective on November 11, 2009.

3. DNR sited a source-oriented ambient lead monitor near the Facility in 2009. The monitor is near the intersection of 8th Avenue and South 27th Street in Council Bluffs, Iowa. In 2010, six 3-month rolling averages over the 0.15 $\mu\text{g}/\text{m}^3$ lead NAAQS were measured by DNR at this monitor. Those six values did not meet the lead health standard. The maximum 3-month average measured by DNR in 2010 occurred during the June-August period and was 0.26 $\mu\text{g}/\text{m}^3$. (In 2012, four 3-month rolling averages over the 0.15 $\mu\text{g}/\text{m}^3$ lead NAAQS were monitored. Those four values did not meet the lead health standard. The maximum 3-month average measured by DNR in 2012 occurred during the August-October period and was 0.20 $\mu\text{g}/\text{m}^3$.)

4. On November 22, 2011, EPA published in the Federal Register (76 FR 72097) a nonattainment designation for portions of Pottawattamie County, Iowa. The nonattainment area includes the Facility and the designation became effective December 31, 2011.

5. The State of Iowa must submit a SIP revision that meets the requirements of Clean Air Act section 172(c) and provides for attainment of the 2008 Lead NAAQS as expeditiously as practicable, but no later than December 31, 2016.

6. DNR air quality dispersion modeling of Griffin Pipe has predicted that the Facility was a contributor to the monitored lead NAAQS violations. The Facility is not the sole source of lead emissions in the nonattainment area.

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7. On May 3, 2014, Griffin Pipe idled operations at its Council Bluffs plant. Griffin Pipe does not presently plan to rescind its current DNR air quality permits.

8. DNR and Griffin Pipe have been working together to quantify lead emissions, identify sources that may need controls upgraded or added, and develop options for implementing changes to achieve attainment and maintenance of the 2008 Lead NAAQS. The DNR and Griffin Pipe are entering into this administrative consent order to create two enforceable control strategies. Each control strategy contains control measures and timelines for implementation. Griffin Pipe may choose which strategy to implement.

9. Amendments to this administrative consent order and the attachments constitute a revision to the SIP and must be submitted to the EPA for approval.

10. By agreeing to the terms of this administrative consent order Griffin Pipe does not admit that the facility caused or contributed to monitored lead levels above the NAAQS.

IV. CONCLUSIONS OF LAW

1. The emission sources located at the Facility include “air contaminant sources” as defined by Iowa Code section 455B.131(2), and “stationary sources” as defined by 567 Iowa Administrative Code (IAC) 20.2.

2. 567 IAC 28.1 states that the ambient air quality standards for the State of Iowa shall be the NAAQS located at 40 Code of Federal Regulations (CFR) Part 50, as amended through June 22, 2010. 40 CFR 50 states that the lead NAAQS is 0.15 µg/m³, arithmetic mean concentration over a 3-month period. The monitoring data near Griffin Pipe measured 3-month average lead concentrations in 2010 (and 2012) that did not meet the lead NAAQS. The NAAQS violations in this case constitute “air pollution” as defined in Iowa Code section 455B.131(3).

3. Effective December 31, 2011, the Facility is located in a lead nonattainment area. The lead nonattainment area is delineated according to the boundary definitions in 40 CFR 81.316.

4. Section 191(a) of the Clean Air Act provides that “[a]ny State containing an area designated or redesignated under [Clean Air Act] section 107(d) as nonattainment with respect to the national primary ambient air quality standards for...lead... shall submit to the Administrator...an applicable implementation plan meeting the requirements of this part.” Clean Air Act Section 172(c) requires that “[s]uch plan provisions shall include enforceable emission limitations, and such other control measures...as well as schedules and timetables for compliance, as may be necessary or appropriate to provide for attainment of such standard in such area by the applicable attainment date....”

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5. Iowa Code sections 455B.134(9) and 455B.138(1) authorize the Director to issue orders necessary to secure compliance with or prevent a violation of Iowa Code chapter 455B, Division II, and the rules promulgated or permits issued pursuant thereto, and to prevent, abate, and control air pollution. This administrative consent order creates enforceable control measures to address the lead concentrations in ambient air in Council Bluffs.

V. ORDER

THEREFORE, DNR and Griffin Pipe agree to the following:

1. Griffin Pipe shall either (1) implement the control measures contained in Attachment A, or (2) implement the control measures contained in Attachment B to this administrative consent order. Griffin Pipe may (but is not required under this administrative consent order to) install and operate additional emission control projects and may improve the emission controls listed in the attachments as necessary to further reduce ambient lead concentrations in Council Bluffs, Iowa, in compliance with applicable laws and administrative rules and with prior approval of the DNR;

2. Griffin Pipe shall either (1) meet all emission limits and all point source characteristics specified in Attachment A, or (2) meet all emissions limits and all point source characteristics specified in Attachment B to this administrative consent order;

3. The requirements contained in this order and Attachments A and B may be modified with the written approval of DNR and Griffin Pipe. Any request for modification to any requirements contained in this order or an attachment must be approved by the DNR prior to its respective deadline. Any modifications to this order or an attachment may be subject to approval of the US EPA and may result in the requirement to complete a modeled attainment demonstration using approved dispersion modeling techniques, if requested by DNR;

4. Griffin Pipe shall comply with the following requirements:

A. With respect to performance testing, Griffin Pipe shall either (1), if opting to implement the control measures contained in Attachment A, complete performance testing to demonstrate compliance with the lead emission limits contained in Attachment A in accordance with the frequency and timelines specified therein, or (2), if opting to implement the control measures contained in Attachment B, complete performance testing to demonstrate compliance with the lead emission limits contained in Attachment B in accordance with the frequency and timelines specified therein.

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In the event any performance testing conducted by Griffin Pipe demonstrates an exceedance, Griffin Pipe shall communicate to the DNR how the exceedance will be corrected and establish with DNR a compliance plan to address the exceedance.

B. With respect to work practices Griffin Pipe shall either (1) follow the monitoring, recordkeeping and reporting requirements contained in Attachment A to this administrative consent order when implementing the control measures specified in Attachment A beginning on the date this administrative consent order is signed by the Director, unless otherwise specified in Attachment A, or (2) follow the monitoring, recordkeeping and reporting requirements contained in Attachment B to this administrative consent order when implementing the control measures specified in Attachment B beginning on the date this administrative consent order is signed by the Director, unless otherwise specified in Attachment B.

If a monitoring, recordkeeping, or reporting requirement(s) specified in Attachment A or Attachment B cannot be completed due to unforeseen circumstances, then the conditions which prevented the completion of the requirement(s) shall be documented, including the time period during which the conditions preventing completion of the requirements existed and the actions taken to remedy the situation.

From the date this order is issued until the date the Facility resumes operations the monitoring, recordkeeping and reporting requirements contained in Paragraph 4 of this order shall be suspended. Resume(s) operations shall mean the resumption of pipe products manufacture and production operations, including resumption of the cupola operations at the Facility

C. The performance testing and work practices requirements may be adjusted after performance testing is completed to more accurately represent the observed operating ranges of the equipment during the successful demonstration of compliance;

5. Nothing in this Administrative Consent Order prevents Griffin Pipe from opting to comply with Attachment A, and thereafter opting (at its discretion) to comply with the requirements contained in Attachment B.

6. Griffin Pipe shall certify compliance with the provisions of this administrative consent order as part of Griffin Pipe's compliance certification obligations pursuant to its Title V Operating permit for this facility;

7. Griffin Pipe shall notify the DNR in writing at least 60 days prior to the date the Facility resumes operations and thereafter shall notify the DNR in writing within 14 days of suspending plant operations;

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8. In the event Griffin Pipe opts to proceed with the implementation of the control measures contained in Attachment B, Griffin Pipe shall notify the DNR in writing at least 180 days prior to implementing the control measures in Attachment B. The notification shall include complete construction permit applications that incorporate the conditions in Attachment B;

9. Nothing in this order shall excuse Griffin Pipe from compliance with any applicable law.

VI. WAIVER OF APPEAL RIGHTS

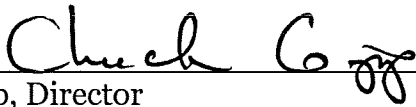
This administrative consent order is entered into knowingly by and with the consent of Griffin Pipe. For that reason, Griffin Pipe waives the right to appeal this administrative consent order.

VII. NONCOMPLIANCE

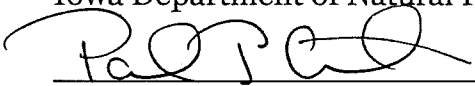
Failure to comply with this administrative consent order may result in the imposition of administrative penalties or referral to the Attorney General to obtain injunctive relief and civil penalties pursuant to Iowa Code section 455B.146.

VIII. TERMINATION OF THIS ADMINISTRATIVE CONSENT ORDER

A termination of this administrative consent order shall not occur unless: (1) this administrative consent order is superseded; (2) construction permits, with equivalent or more stringent requirements than those listed in either of the attachments to this administrative consent order, have been issued, construction is completed, and all construction permits respecting such requirements have been incorporated into the Iowa SIP and approved by US EPA; or (3) the Facility is permanently closed and all permits have been rescinded.



Chuck Gipp, Director
Iowa Department of Natural Resources



Paul Ciolino, President
Griffin Pipe Products Co., LLC

Dated this 29th day of
January, 2015

Dated this 27th day of
JANUARY, 2014
2015

#78-01-012; Matthew Johnson, DNR Air Quality; Jim McGraw, DNR Air Quality;
Anne Preziosi

ATTACHMENT A

Plant Name: Griffin Pipe Products Company

Equipment Location: 2601 9th Avenue
Council Bluffs, Iowa 51501

Plant Number: 78-01-012

The following emission units shall conform to the requirements specified in condition A-1:

A-1. Emission Unit Description

Emission Unit	Maximum Rated Capacity	Control Equipment
Cupola (EU-1)	60 Tons/hr	Baghouse (CE-10)
Desulfurization (EU-2)	60 Tons/hr	Baghouse (CE-11)
Bull Ladle (EU-3)	60 Tons/hr	
Magnesium Inoculation (EU-4)	60 Tons/hr	
Small Diameter Casting (EU-6)	60 Tons/hr	None
Desulfurization (EU-2)-Uncaptured	60 Tons/hr	None
Bull Ladle (EU-3)-Uncaptured	60 Tons/hr	
Magnesium Inoculation (EU-4)-Uncaptured	60 Tons/hr	None
Large Diameter Casting (EU-29)	40 Tons/hr	None
Cupola Charge Handling (EU-17)	60 Tons/hr	None
Traffic Pathways	NA	Paved Road Sweeping

A-2. Lead (Pb) Emission Limits

The following lead (Pb) emission limits shall not be exceeded:

Source Description	EP ID	lb/hr ¹	tons/yr ²	Additional Limits	Justification
Cupola (EU-1)	EP-2A	0.282 ³	NA	NA	RACT
		0.046 ⁴	NA	NA	See Note 4
Desulfurization (EU-2)	EP-3	0.0018 ³	NA	NA	RACT
Bull Ladle (EU-3)					
Magnesium Inoculation (EU-4)	EP-7A	0.0026 ³	NA	NA	RACT
Magnesium Inoculation-Uncaptured (EU-4)					
Ladle Preheat-Uncaptured (EU-19)	EP-7B	0.0372 ³	NA	NA	RACT
Desulfurization-Uncaptured (EU-2)					
Bull Ladle-Uncaptured (EU-3)	EP-6A	0.0043 ³	NA	NA	RACT
Small Diameter Casting (EU-6)					
Small Diameter Casting (EU-6)	EP-6B	0.0025 ³	NA	NA	RACT
Building Emissions	EP-29	0.0025 ³	NA	NA	RACT
Large Diameter Casting (EU-29)	EP-29A				
Cupola Charge Handling (EU-17)	FUG1	0.00143 ³	NA ⁵	NA ⁶	RACT
Traffic Pathways	NA	NA			RACT, 23.3(2)“c”

¹ The emission limit is expressed as the average of three (3) runs.

² The emission limit is a twelve (12) month rolling total.

³ The lead limit is established to address the nonattainment designation for a portion of Pottawattamie County published in the Federal Register (76 FR 72097) on November 22, 2011.

⁴ The lead limit is an applicable requirement established in a federally enforceable Consent Decree entered in United States v. Griffin Pipe Products Co., LLC, (Civil Action No. 1:14-cv-00027-JAJ-RAW)

⁵ The lead limit is established at 0.002 tons of lead per rolling 3-month total; that correlates to a lead silt loading content of 0.00016 g/m² and maximum potential operation (all raw material/product is shipped or received by truck). The lead limit is based on 95% reduction over baseline lead levels and is established to address the nonattainment designation for a portion of Pottawattamie County published in the Federal Register (76 FR 72097) on November 22, 2011.

⁶ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond lot line of the property.

A-3. Emission Point Characteristics

These emission points shall conform to the specifications listed below:

EP ID	Stack Height, Feet	Discharge Style	Stack Opening, inches
EP-2A	100	Vertical Unobstructed	80 diameter
EP-3	100	Vertical Unobstructed	72 diameter
EP-7A	49	Vertical Unobstructed	122 diameter
EP-7B	49	Vertical Unobstructed	122 diameter
EP-6A	49	Vertical Unobstructed	80 diameter
EP-6B	49	Vertical Unobstructed	80 diameter
EP-29	48	Vertical Unobstructed	72 x 72
EP-29A	48	Vertical Unobstructed	72 x 72

A-4. Lead (Pb) Compliance Demonstration(s)

Emission Point ID	Compliance Demonstration	Compliance Methodology	Frequency
EP-2A	Yes	Performance Testing	Annual ²
EP-3	Yes	Performance Testing	Annual ²
EP-7A	Yes	Performance Testing	Annual ²
EP-7B	Yes	Performance Testing	Annual ²
EP-6A	Yes	Performance Testing	Once Every 3-years ²
EP-6B	Yes	Performance Testing	Once Every 3-years ^{2,3}
EP-29	Yes	Performance Testing ¹	Once Every 3-years ²
EP-29A	Yes	Performance Testing ¹	Once Every 3-years ²
FUG1	Yes	Work Practice	NA
Traffic Pathways	Yes	Silt Load Sampling	Monthly ⁴

¹ Performance testing for lead shall be conducted on EP-29 and EP-29A simultaneously to demonstrate compliance with emission limit as specified in condition A-2.

² Following a written request by Griffin Pipe Products Company and approval by Iowa DNR, the testing frequency may be decreased following initial or subsequent performance testing.

³ Maximum operating capacity shall be based on the Cupola (EU-1) charge rate.

⁴ Following 12 monthly sampling events, based on a written request by Griffin Pipe Products Company and approval by Iowa DNR, the silt loading sampling may be reduced or eliminated.

Performance Testing Requirements

If a compliance demonstration specified above is performance testing, the owner or the owner's authorized agent shall verify compliance with the emission limitations contained in Condition A-2 within 6 months after the restart date of the equipment.

If subsequent performance testing is specified above, the owner or the owner's authorized agent shall verify compliance with the emission limitations contained in Condition A-2 according to the frequency and timeframe noted above.

If testing is required, the owner or the owner's authorized agent shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
Pb	1 hour	40 CFR 60, Appendix A, Method 12 or Method 29

Each performance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A-4. Lead (Pb) Compliance Demonstration(s) (continued)

Per 567 IAC 25.1(7)“a”, at the Department’s request, for each performance test a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol for each performance test shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner’s intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Silt Load Sampling Requirements

For each sampling event, silt loading sampling shall be done for at least 3 different locations. Sampling shall be completed at locations that are representative of normal conditions and shall not be conducted within 4 hours after paved road sweeping has occurred. The three sampled locations shall then be averaged to determine the silt loading for that month. Silt load testing shall be conducted according to the procedures outlined in AP-42, Appendix C.1 Procedures for Sampling Surface/Bulk Dust Loading and C.2 Procedures for Laboratory Analysis of Surface/Bulk Dust Loading Samples.

The owner or operator shall commence silt load sampling to verify compliance with the haul road operating limitations contained in Condition A-5.L during the first 30-days the facility resumes operations and subsequent sampling of haul road surface silt loading shall be completed on a monthly basis.

After 3 consecutive months of haul road surface silt loading sampling and every month thereafter, the owner or operator shall calculate the 3-month rolling average total silt loading content to determine compliance with the operating limit included in Condition A-5.L. As an alternative, the owner or operator may analyze the samples for lead content and calculate the 3-month rolling average lead silt loading to demonstrate compliance with the pollutant specific operating limit provided in Condition A-5.L.

If the 3-month rolling average silt loading limit is exceeded, the owner or operator shall immediately double the frequency of sweeping. The increased sweeping frequency shall occur until the lead silt loading results are obtained and demonstrate compliance with the 3-month rolling lead silt loading limit provided in Condition A-5.L or until such time as additional silt loading samples demonstrate compliance with the 3-month rolling total silt loading limit provided in Condition A-5.L. The owner or operator shall maintain records onsite that detail the date the measured silt loading exceeded Condition A-5.L, the date in which increased sweeping frequency was enacted and the date that compliance was demonstrated with Condition A-5.L.

The owner or operator shall develop and submit a silt/lead sampling protocol to the Department for approval 30-days prior to resuming operation. The submitted silt/lead sampling protocol shall detail procedures for sample chain of custody, identification, storage, and lead analysis. The approved silt/lead sampling protocol shall be implemented and retained onsite.

A-5. Operating Limits

Operating limits shall be:

- A. The production rate shall not exceed 235,150 tons of metal charged per rolling twelve-month period.
- B. All emission units specified in Table 1 below are limited to operating 1,250 hours per rolling 3-month period.

Table 1: Scrap Melting Activities

Emission Unit
Cupola (EU-1)
Desulfurization (EU-2)
Bull Ladle (EU-3)
Magnesium Inoculation (EU-4)
Small Diameter Casting (EU-6)
Desulfurization (EU-2)-Uncaptured
Bull Ladle (EU-3)-Uncaptured
Magnesium Inoculation (EU-4)-Uncaptured
Large Diameter Casting (EU-29)
Cupola Charge Handling (EU-17)

- C. The pressure drop across the baghouse (CE-10) shall be between 3.5 to 10.0 inches of water column based on a 5-minute average.
- D. The pressure drop across the baghouse (CE-11) shall be between 3.5 to 10.0 inches of water column based on a 5-minute average.
- E. Maintain Baghouse (CE-10) according to manufacturer specifications and maintenance schedule.
- F. Maintain Baghouse (CE-11) according to manufacturer specifications and maintenance schedule.
- G. The owner or operator shall implement work practice standards as specified in Standard Operating Procedure (SOP) Melt180CB to minimize emissions from Cupola Charge Handling (EU-17).
- H. The owner or operator shall implement the scrap management plan as specified in Standard Operating Procedure (SOP) Melt220CB.
- I. Limit public access. The owner or operator shall restrict public access to the facility at all property boundary lines. The restriction does not apply to company employees, contractors, delivery/shipping personnel, federal, state or local officials, emergency and maintenance service personnel (both private and public section), or others who have a legitimate reason for accessing the property.
- J. Fugitive dust emissions generated from truck traffic on the paved haul roads shall, at a minimum, be controlled by sweeping once per day except as noted in Conditions A-5.J (i) through (iv). All sweeping must be completed using a Tynco DST-4 Sweeper or functionally equivalent sweeper type (as approved by the Department).
 - i. Paved road sweeping shall begin within seven (7) days after resuming operations at Griffin Pipe Products Company (Plant No. 78-01-012).
 - ii. If sweeping cannot be accomplished because the ambient air temperature (as measured at the facility during daylight operating hours) will be less than 35° F (1.7° C) or conditions due to weather could create hazardous driving conditions, then the sweeping shall be postponed and accomplished as soon after the scheduled date as the conditions preventing the sweeping have abated.
 - iii. Paved road sweeping need not occur when a rain gauge located at the site indicates that at least 0.2 inches of precipitation (water equivalent) has occurred within the preceding 24-hour time period. However, paved road sweeping shall resume within 24-hours after the precipitation event has ended.
 - iv. Paved road sweeping need not occur when the facility experiences no production or shipping activities on that calendar day.

A-5. Operating Limits (continued)

- K. If sweeping cannot be accomplished for the entire month due to ambient temperatures or hazardous weather, silt load testing is not required for that month.
 - L. The haul road surface total silt loading or lead silt loading shall not exceed 0.64 g/m^2 or 0.00016 g/m^2 , respectively, based on a 3-month rolling average.
 - M. Bulk material shipments or deliveries of product, waste and raw materials shall only occur from 7 am to 5 pm daily.
 - N. Best Management Practices (BMP) – The owner or operator shall implement “good housekeeping” or best management practices to minimize fugitive emissions. Such practices include but are not limited to:
 - i. Clean up spills of lead containing raw materials on the haul road surface as expeditiously as possible and in a manner consistent with good practice for minimizing emissions.
 - ii. Clean areas where lead containing materials are processed and where lead containing dust may be generated such as scrap melting areas in a manner consistent with minimizing fugitive lead emissions.
 - iii. Post and maintain speed limit (15 mph) signs.
 - iv. Clean up of possible lead containing materials (i.e. baghouse dust) around the cupola and desulfurization baghouse buildings.
 - O. Contingency Measures
 - i. After November 30, 2014, the owner or operator shall increase the frequency of cleaning/sweeping of the haul roads to twice per day within seven (7) days after notification by the Department that a monitored exceedance of the lead NAAQS occurred. The owner or operator shall also submit sweeping data to the Department and continue daily cleaning/sweeping until notified by the Department that a different cleaning/sweeping frequency shall be used.
 - ii. After November 30, 2014, the owner or operator shall implement good housekeeping practices on paved haul road surfaces within seven (7) days after notification by the Department that a monitored exceedance of the lead NAAQS occurred during months in which the inclement weather provision as specified in condition A-5.J.ii applied. The good housekeeping practices shall include but are not limited to daily removal of material piles that have accumulated on haul road surfaces and decreasing vehicle speeds on paved road surfaces from 15 mph to 5 mph. The owner or operator shall continue good housekeeping practices on paved road surfaces until paved road sweeping resumes.
 - iii. If a monitored exceedance of the lead NAAQS occurs after the provisions of Condition A-5.O.i or A-5.O.ii have been implemented for three (3) full calendar months the owner or operator will submit an emissions evaluation meeting the criteria and timeline specified by the Department.
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A-6. Operating Condition Monitoring and Recordkeeping

Unless specified by a federal regulation, all records shall be kept on-site (in hardcopy or electronic form) for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The cumulative tons of metal charged on a rolling-12-month total for each month of operation.
- B. Record on a monthly basis, the number of hours that Cupola (EU-1) is operated. Calculate and record 3-month rolling totals.
- C. Calculate and record the average pressure drop across the baghouse (CE-10) in inches of water column. The average pressure drop shall be expressed and recorded as the average of all pressure drop data measured during each 5-minute period.
- D. Calculate and record the average pressure drop across the baghouse (CE-11) in inches of water column. The average pressure drop shall be expressed and recorded as the average of all pressure drop data measured during each 5-minute period.

A-6. Operating Condition Monitoring and Recordkeeping (continued)

- E. Maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of Baghouse (CE-10).
 - F. Maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of Baghouse (CE-11).
 - G. Retain on-site a copy of Standard Operating Procedure (SOP) Melt180CB and all records required by the plan to minimize emissions from Cupola Charge Handling (EU-17).
 - H. Retain on-site a copy of the approved Standard Operating Procedure (SOP) Melt220CB and all records required by the plan.
 - I. The owner or operator shall record the frequency of cleaning/sweeping performed on the haul roads. If the roads are not cleaned due to weather, a written record must be kept on site outlining the conditions.
 - J. The owner or operator shall record daily the date and time of bulk raw material, waste material and product received or shipped via truck.
 - K. The owner or operator shall maintain a log of each silt load sampling event that contains the following:
 - i. The date and time that sweeping was conducted;
 - ii. The date and time of silt load sampling event;
 - iii. The location of the sample taken;
 - iv. The measured silt content in grams;
 - v. Sample area used for silt load sampling in meters; and,
 - vi. The operator's initials.
 - L. The owner or operator shall maintain a record of the 3-month rolling average of each monthly average sampling event in g/m^2 to determine compliance with Condition A-5.L.
 - M. Prior to resuming facility operations the owner or operator shall develop a written plan to implement, at a minimum, the Best Management Practices as specified in condition A-5.N. The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.
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ATTACHMENT B

Plant Name: Griffin Pipe Products Company

Equipment Location: 2601 9th Avenue
Council Bluffs, Iowa 51501

Plant Number: 78-01-012

The following emission units shall conform to the requirements specified in condition B-1:

B-1. Emission Unit Description

Emission Unit	Maximum Rated Capacity	Control Equipment
Cupola (EU-1)	60 Tons/hr	Baghouse (CE-10)
Desulfurization (EU-2)	60 Tons/hr	Baghouse (CE-11)
Bull Ladle (EU-3)	60 Tons/hr	
Magnesium Inoculation (EU-4)	60 Tons/hr	
Small Diameter Casting (EU-6)	60 Tons/hr	None
Desulfurization (EU-2)-Uncaptured	60 Tons/hr	Baghouse (CE-12)
Bull Ladle (EU-3)-Uncaptured	60 Tons/hr	
Magnesium Inoculation (EU-4)-Uncaptured	60 Tons/hr	None
Large Diameter Casting (EU-29)	40 Tons/hr	None
Cupola Charge Handling (EU-17)	60 Tons/hr	None
Traffic Pathways	NA	Paved Road Sweeping

B-2. Lead (Pb) Emission Limits

The following lead (Pb) emission limits shall not be exceeded:

Source Description	EP ID	lb/hr ¹	tons/yr ²	Additional Limits	Justification
Cupola (EU-1)	EP-2A	0.282 ³	NA	NA	RACT
		0.046 ⁴	NA	NA	See Note 4
Desulfurization (EU-2)	EP-3	0.02 ³	NA	NA	RACT
Bull Ladle (EU-3)					
Magnesium Inoculation (EU-4)					
Magnesium Inoculation-Uncaptured (EU-4)	EP-7A	0.0075 ³	NA	NA	RACT
Ladle Preheat-Uncaptured (EU-19)					
Desulfurization-Secondary Capture (EU-2)	EP-7B	0.0025 ³	NA	NA	RACT
Bull Ladle-Secondary Capture (EU-3)					
Small Diameter Casting (EU-6)					
Small Diameter Casting (EU-6)	EP-6A	0.0043 ³	NA	NA	RACT
Building Emissions	EP-6B	0.0015 ³	NA	NA	RACT
Large Diameter Casting (EU-29)	EP-29	0.0025 ³	NA	NA	RACT
	EP-29A				
Cupola Charge Handling (EU-17)	FUG1	0.00143 ³	NA ⁵	NA ⁶	RACT
Traffic Pathways	NA	NA			RACT, 23.3(2)“c”

¹ The emission limit is expressed as the average of three (3) runs.

² The emission limit is a twelve (12) month rolling total.

³ The lead limit is established to address the nonattainment designation for a portion of Pottawattamie County published in the Federal Register (76 FR 72097) on November 22, 2011.

⁴ The lead limit is an applicable requirement established in a federally enforceable Consent Decree entered in United States v. Griffin Pipe Products Co., LLC, (Civil Action No. 1:14-cv-00027-JAJ-RAW)

⁵ The lead limit is established at 0.004 tons of lead per rolling 3-month total; that correlates to a lead silt loading content of 0.00032 g/m² and maximum potential operation (all raw material/product is shipped or received by truck). The lead limit is based on 90% reduction over baseline lead levels and is established to address the nonattainment designation for a portion of Pottawattamie County published in the Federal Register (76 FR 72097) on November 22, 2011.

⁶ The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond lot line of the property.

B-3. Emission Point Characteristics

These emission points shall conform to the specifications listed below:

EP ID	Stack Height, Feet	Discharge Style	Stack Opening, inches
EP-2A	100	Vertical Unobstructed	80 diameter
EP-3	100	Vertical Unobstructed	72 diameter
EP-7A	49	Vertical Unobstructed	122 diameter
EP-7B	100	Vertical Unobstructed	68 diameter
EP-6A	49	Vertical Unobstructed	80 diameter
EP-6B	49	Vertical Unobstructed	80 diameter
EP-29	48	Vertical Unobstructed	72 x 72
EP-29A	48	Vertical Unobstructed	72 x 72

B-4. Lead (Pb) Compliance Demonstration(s)

Emission Point ID	Compliance Demonstration	Compliance Methodology	Frequency
EP-2A	Yes	Performance Testing	Annual ²
EP-3	Yes	Performance Testing	Annual ²
EP-7A	Yes	Performance Testing	Annual ²
EP-7B	Yes	Performance Testing	Annual ²
EP-6A	Yes	Performance Testing	Once Every 3-years ²
EP-6B	Yes	Performance Testing	Once Every 3-years ^{2,3}
EP-29	Yes	Performance Testing ¹	Once Every 3-years ²
EP-29A	Yes	Performance Testing ¹	Once Every 3-years ²
FUG1	Yes	Work Practice	NA
Traffic Pathways	Yes	Silt Load Sampling	Monthly ⁴

¹ Performance testing for lead shall be conducted on EP-29 and EP-29A simultaneously to demonstrate compliance with emission limit as specified in condition B-2.

² Following a written request by Griffin Pipe Products Company and approval by Iowa DNR, the testing frequency may be decreased following initial or subsequent performance testing.

³ Maximum operating capacity shall be based on the Cupola (EU-1) charge rate.

⁴ Following 12 monthly sampling events, based on a written request by Griffin Pipe Products Company and approval by Iowa DNR, the silt loading sampling may be reduced or eliminated.

Performance Testing Requirements

If an initial compliance demonstration specified above is performance testing, the owner or the owner's authorized agent shall verify compliance with the emission limitations contained in Condition B-2 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the equipment.

If subsequent performance testing is specified above, the owner or the owner's authorized agent shall verify compliance with the emission limitations contained in Condition B-2 according to the frequency and timeframe noted above.

If testing is required, the owner or the owner's authorized agent shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
Pb	1 hour	40 CFR 60, Appendix A, Method 12 or Method 29

B-4. Lead (Pb) Compliance Demonstration(s) (continued)

Each performance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)“a”, at the Department’s request, for each performance test a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol for each performance test shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Silt Load Sampling Requirements

For each sampling event, silt loading sampling shall be done for at least 3 different locations. Sampling shall be completed at locations that are representative of normal conditions and shall not be conducted within 4 hours after paved road sweeping has occurred. The three sampled locations shall then be averaged to determine the silt loading for that month. Silt load testing shall be conducted according to the procedures outlined in AP-42, Appendix C.1 Procedures for Sampling Surface/Bulk Dust Loading and C.2 Procedures for Laboratory Analysis of Surface/Bulk Dust Loading Samples.

The owner or operator shall commence silt load sampling to verify compliance with the haul road operating limitations contained in Condition B-5.M during the first 30-days the facility resumes operations and subsequent sampling of haul road surface silt loading shall be completed on a monthly basis.

After 3 consecutive months of haul road surface silt loading sampling and every month thereafter, the owner or operator shall calculate the 3-month rolling average total silt loading content to determine compliance with the operating limit included in Condition B-5.M. As an alternative, the owner or operator may analyze the samples for lead content and calculate the 3-month rolling average lead silt loading to demonstrate compliance with the pollutant specific operating limit provided in Condition B-5.M.

If the 3-month rolling average silt loading limit is exceeded, the owner or operator shall immediately double the frequency of sweeping. The increased sweeping frequency shall occur until the lead silt loading results are obtained and demonstrate compliance with the 3-month rolling lead silt loading limit provided in Condition B-5.M or until such time as additional silt loading samples demonstrate compliance with the 3-month rolling total silt loading limit provided in Condition B-5.M. The owner or operator shall maintain records onsite that detail the date the measured silt loading exceeded Condition B-5.M, the date in which increased sweeping frequency was enacted and the date that compliance was demonstrated with Condition B-5.M.

The owner or operator shall develop and submit a silt/lead sampling protocol to the Department for approval 30-days prior to resuming operation. The submitted silt/lead sampling protocol shall detail procedures for sample chain of custody, identification, storage, and lead analysis. The approved silt/lead sampling protocol shall be implemented and retained onsite.

B-5. Operating Limits

Operating limits shall be:

- A. The production rate shall not exceed 235,150 tons of metal charged per rolling twelve-month period.
- B. The pressure drop across the baghouse (CE-10) shall be between 3.5 to 10.0 inches of water column based on a 5-minute average.
- C. The pressure drop across the baghouse (CE-11) shall be between 3.5 to 10.0 inches of water column based on a 5-minute average.
- D. The pressure drop across the baghouse (CE-12) shall be between 3.5 to 10.0 inches of water column based on a 5-minute average.
- E. Maintain Baghouse (CE-10) according to manufacturer specifications and maintenance schedule.
- F. Maintain Baghouse (CE-11) according to manufacturer specifications and maintenance schedule.
- G. Maintain Baghouse (CE-12) according to manufacturer specifications and maintenance schedule.
- H. The owner or operator shall implement work practice standards as specified in Standard Operating Procedure (SOP) Melt180CB to minimize emissions from Cupola Charge Handling (EU-17).
- I. The owner or operator shall implement the scrap management plan as specified in Standard Operating Procedure (SOP) Melt220CB.
- J. Limit public access. The owner or operator shall restrict public access to the facility at all property boundary lines. The restriction does not apply to company employees, contractors, delivery/shipping personnel, federal, state or local officials, emergency and maintenance service personnel (both private and public section), or others who have a legitimate reason for accessing the property.
- K. Fugitive dust emissions generated from truck traffic on the paved haul roads shall, at a minimum, be controlled by:
 - i. Sweeping 3 times a week when the haul roads are used six (6) days in a week, with a maximum of one day between sweeping events except as noted in Conditions B-5.K (iii) through (vi). All sweeping must be completed using a Tymco DST-4 Sweeper or functionally equivalent sweeper type (as approved by the Department).
 - ii. Sweeping 4 times a week when the haul roads are used seven (7) days in a week except as noted in Conditions B-5.K (iii) through (vi). All sweeping must be completed using a Tymco DST-4 Sweeper or functionally equivalent sweeper type (as approved by the Department).
 - iii. Paved road sweeping shall begin within seven (7) days after resuming operations at Griffin Pipe Products Company (Plant No. 78-01-012).
 - iv. If sweeping cannot be accomplished because the ambient air temperature (as measured at the facility during daylight operating hours) will be less than 35° F (1.7° C) or conditions due to weather could create hazardous driving conditions, then the sweeping shall be postponed and accomplished as soon after the scheduled date as the conditions preventing the sweeping have abated.
 - v. Paved road sweeping need not occur when a rain gauge located at the site indicates that at least 0.2 inches of precipitation (water equivalent) has occurred within the preceding 24-hour time period. However, paved road sweeping shall resume within 24-hours after the precipitation event has ended.
 - vi. Paved road sweeping need not occur when the facility experiences no production or shipping activities on that calendar day.
- L. If sweeping cannot be accomplished for the entire month due to ambient temperatures or hazardous weather, silt load testing is not required for that month.
- M. The haul road surface total silt loading or lead silt loading shall not exceed 1.28 g/m² or 0.00032 g/m², respectively, based on a 3-month rolling average.

B-5. Operating Limits (continued)

- N. Best Management Practices (BMP) – The owner or operator shall implement “good housekeeping” or best management practices to minimize fugitive emissions. Such practices include but are not limited to:
- i. Clean up spills of lead containing raw materials on the haul road surface as expeditiously as possible and in a manner consistent with good practice for minimizing emissions.
 - ii. Clean areas where lead containing materials are processed and where lead containing dust may be generated such as scrap melting areas in a manner consistent with minimizing fugitive lead emissions.
 - iii. Post and maintain speed limit (15 mph) signs.
 - iv. Clean up of possible lead containing materials (i.e. baghouse dust) around the cupola and desulfurization baghouse buildings.
- O. Contingency Measures
- i. After November 30, 2014, the owner or operator shall increase the frequency of cleaning/sweeping of the haul roads to once per day within seven (7) days after notification by the Department that a monitored exceedance of the lead NAAQS occurred. The owner or operator shall also submit sweeping data to the Department and continue daily cleaning/sweeping until notified by the Department that a different cleaning/sweeping frequency shall be used.
 - ii. After November 30, 2014, the owner or operator shall implement good housekeeping practices on paved haul road surfaces within seven (7) days after notification by the Department that a monitored exceedance of the lead NAAQS occurred during months in which the inclement weather provision as specified in condition B-5.K.iv applied. The good housekeeping practices shall include but are not limited to daily removal of material piles that have accumulated on haul road surfaces and decreasing vehicle speeds on paved road surfaces from 15 mph to 5 mph. The owner or operator shall continue good housekeeping practices on paved road surfaces until paved road sweeping resumes.
 - iii. If a monitored exceedance of the lead NAAQS occurs after the provisions of Condition B-5.O.i or B-5.O.ii have been implemented for three (3) full calendar months the owner or operator will submit an emissions evaluation meeting the criteria and timeline specified by the Department.
-

B-6. Operating Condition Monitoring and Recordkeeping

Unless specified by a federal regulation, all records shall be kept on-site (in hardcopy or electronic form) for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The cumulative tons of metal charged on a rolling-12-month total for each month of operation.
- B. Calculate and record the average pressure drop across the baghouse (CE-10) in inches of water column. The average pressure drop shall be expressed and recorded as the average of all pressure drop data measured during each 5-minute period.
- C. Calculate and record the average pressure drop across the baghouse (CE-11) in inches of water column. The average pressure drop shall be expressed and recorded as the average of all pressure drop data measured during each 5-minute period.
- D. Calculate and record the average pressure drop across the baghouse (CE-12) in inches of water column. The average pressure drop shall be expressed and recorded as the average of all pressure drop data measured during each 5-minute period.
- E. Maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of Baghouse (CE-10).
- F. Maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of Baghouse (CE-11).

B-6. Operating Condition Monitoring and Recordkeeping (continued)

- G. Maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of Baghouse (CE-12).
 - H. Retain on-site a copy of Standard Operating Procedure (SOP) Melt180CB and all records required by the plan to minimize emissions from Cupola Charge Handling (EU-17).
 - I. Retain on-site a copy of the approved Standard Operating Procedure (SOP) Melt220CB and all records required by the plan.
 - J. The owner or operator shall record the frequency of cleaning/sweeping performed on the haul roads. If the roads are not cleaned due to weather, a written record must be kept on site outlining the conditions.
 - K. The owner or operator shall maintain a log of each silt load sampling event that contains the following:
 - i. The date and time that sweeping was conducted;
 - ii. The date and time of silt load sampling event;
 - iii. The location of the sample taken;
 - iv. The measured silt content in grams;
 - v. Sample area used for silt load sampling in meters; and,
 - vi. The operator's initials.
 - L. The owner or operator shall maintain a record of the 3-month rolling average of each monthly average sampling event in g/m^2 to determine compliance with Condition B-5.M.
 - M. Prior to resuming facility operations the owner or operator shall develop a written plan to implement, at a minimum, the Best Management Practices as specified in condition B-5.N. The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.
-

B-1. Griffin Pipe's Melt180CB & Melt220CB Standard Operating Procedures

These documents are referenced by, but not directly appended to, the ACO.



GRIFFIN PIPE PRODUCTS CO.

COUNCIL BLUFFS PLANT

STANDARD OPERATING PROCEDURE

Title: Scrap Inspection
& Charge Handling

Instruction #: Melt180CB

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Issue Date:

Revision #: 3

Date: 10-20-2014

1.0 SCOPE

This work instruction describes the steps taken when inspecting scrap for cupola melting and for handling of the cupola charge in such a manner as to minimize fugitive dust emissions.

2.0 EQUIPMENT

- (1) Proper safety equipment including hardhat, ear and eye protection and steel-toed boots with metatarsal guard.
- (2) Radiation Detector Handheld (Backup)
- (3) Radiation Detector Fixed Mount
- (4) S-101CB Shredded Scrap (Frag) -Latest Revision
- (5) S-102CB No. 2 Steel Scrap- Latest Revision
- (6) Melt180CB-1 Scrap Inspection Checklist-Latest Revision
- (7) Supplier Incident Report- F-741002
- (8) Iowa DNR- RADIOACTIVE MATERIAL DETECTION
SYSTEMS FOR SCRAP METAL FACILITIES
REGULATORY GUIDE Rev 7/1/05
- (9) 0.25 μ Radiation Test puck

3.0 GENERAL REQUIREMENTS FOR SCRAP INSPECTION & CHARGE HANDLING

- (1) **Caution** must always be exercised when walking on railcars and entering into the scrap yard. Ensure the crane operators are aware of your intentions to enter the scrap yard.
- (2) All personnel to inspect loads are required to be trained on all of the requirements of this procedure and with the S-101CB Shredded and S-102CB No. 2 Steel Scrap Specifications
- (3) Inspection Personnel are required to fill out the Melt180CB-1 Scrap Inspection Checklist.
- (4) Purchasing issues supplier numbers specific to each yard and this will be recorded to ensure traceability of materials. Record this number on Melt 180CB-1 Scrap Inspection Checklist
- (5) Crane operators must be aware at all times of other people, vehicles, and equipment that may be present in the scrap yard for short durations
- (6) Crane operators will only move scrap metal with a scrap magnet



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4.0 INSTRUCTIONS FOR SCRAP INSPECTION OF TRUCKS

- (1) All trucks must pass thru the radiation detector located in the shipping area. Max speed is 3mph.
If radiation detector goes off, contact maintenance to verify the operation of the detector. Test the detector using 0.25μ test puck. Retest the truck as needed. Load can be verified with hand held unit. If radiation is still present reject the entire load. **Do not dump any rejected loads to search for source of radiation.**
- (2) Visual inspection for non-conforming products on the load can be done by any trained personnel this is typically done by the crane operator.
- (3) Crane operator will clean the area for unloading then authorize the driver to dump the truckload.
- (4) Once dumped on the ground visual inspection for any non-conforming products is done. Once placed continue to check the load by inspecting the material as it is handled by the magnet. Inspect the ground carefully when cleaning up as this is when nonmagnetic contamination will be readily visible
- (5) Notify supervision and purchasing department of non-conformance following Supplier Incident Reporting.

5.0 INSTRUCTIONS FOR RAILCAR INSPECTION

- (1) All railcars are radiation detected by the as they cross the scale. The top of all railcars are visually inspected for non-conforming products via cameras located in the storeroom office.
 - i. If manual inspection of the railcar is necessary, contact the crane operators and/or engine operators so that they are aware of you intention to check the railcar. Climb the railcar ladder and visually inspect the top surface for non-conforming product.
 - ii. If fixed mount radiation detector is inoperable the handheld unit will be used to scan all the railcars in the lineup
- (2) Once placed in the lineup continue to check the railcar by inspecting the material as it is handled by the magnet. Also use the mirror on crane to inspect the car carefully when empty as this is when nonmagnetic contamination will be readily visible.
- (3) Notify supervision and purchasing department of non-conformance following Supplier Incident Reporting.

6.0 INSTRUCTION FOR SCRAP DOCUMENTATION

- (1) Document time of load, scrap supplier, and trucking company or railcar # and initial sheet for all loads that are rejected on form Melt180CB-1.



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- i. Any loads rejected for mercury, lead, and VOC containing products are documented by rating Zero (0) the Environment section of Melt180CB-1.
 - ii. Notify supervision, purchasing and the environmental department of the non-conforming product.
- (2) Sizing-This is any material that does not meet requirement of S-101 or S-102 that are excessively large, heavy, or small and low density.
- (3) Chemistry-This is any materials that visually or chemically when melted do not meet the requirements of S-101 or S-102 Such as elevated Cr, Cu, Sn - Stainless materials and brasses etc.
- (4) Environmental-These are items that do not meet environmental requirements such as Pb limits, mercury switches, Zinc plated and radiation, excess dirt, debris, fines, etc.
- (5) Waste- These are materials that are not to be placed in the cupola and include excess rust fines and non-ferrous materials such as wood, plastic, garbage, dirt and mud etc.
- (6) Each inspection category should be rated using the following guidelines.
 - i. (2) No visible non-conformance is seen score as a two (2)
 - ii. (1) Minor visible non-conformance material that can be see and can be removed without hindering operations, score this as one(1)
 - iii. (0) Excessive visible non-conformance seen, score this as (0)
 - iv. Combine these scores to create a total score. Any rejected load will score a total score of Zero (0) even if other areas meet requirements.
 - v. Chemistry scores may be adjusted down after melting the load results in iron with chemistry above acceptance limits.
- (7) Notify Supervisor, Purchasing and the Environmental Engineer to all Zero Ratings as soon as practical.
- (8) Forward completed forms to purchasing will compile ratings of specific yards into a database and create a feedback report to maintain control of incoming materials.
 - i. Any supplier with a total score of 4-5 will be notified of potential rejection and potential disqualification.
 - ii. Two loads receiving a zero score in one month period is cause for disqualifications an approved supplier.
- (9) A Supplier Incident Report (SIR) is to be completed for non-conforming products. A formal Corrective Action Request (CAR) will be done for major SIR (i.e. a rejection of a load score of Zero (0)) or a supplier has more than three environmental SIR in a year period. Purchases from that supplier will be limited until the CAR is completed to GPP satisfaction.



GRIFFIN PIPE PRODUCTS CO.

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7.0 INSTRUCTIONS FOR CHARGE HANDLING

Fugitive dust emissions associated with charge handling shall be minimized by the following

- (1) All scrap metal will be handled with a scrap magnet in order to minimize non-ferrous materials and fines in the charge makeup
- (2) Crane operators will minimize the height from which scrap is dropped when unloading railcars, while loading scrap into the weight hopper and skip hoist, and at other times when scrap is being moved within the scrapyard
- (3) As necessary, the scrap truck dump area on the east side of the scrap yard will be cleared using the front-end loader to push the scrap west onto the main scrap pile.
- (4) The scrap truck dump area will be periodically cleaned of fines from dirt, dust, and rust by means of scraping the area with the front-end loader. Materials collected from this cleanup will be placed in the lime shed for proper disposal.
- (5) Plant scrap specifications shall limit the amount of fines, dirt, mud and other fine particulate matter in the scrap
- (6) A four-sided enclosure shall be maintained around the bottom position of the skip hoist as a means to minimize emissions when scrap is dropped from the weight hopper into the skip hoist

8.0 REVISION LOG

Date	Revision #	Description
2/22/2011	1	Testing for radiation at shipping. Inspection and reporting non-compliant product. Wording changes.
04/08/2013	2	Wording change and clarified changes in daily inspection sheet 180CB-1
10/20/2014	3	Updated to cover Change Handling procedures with minor updated to other sections

9.0 REVIEW AND APPROVAL

Jeff Suing 10/21/2014
Production Superintendent Date

Douglas Brunow 10/21/2014
Operations Manager Date



GRIFFIN PIPE PRODUCTS CO.

COUNCIL BLUFFS PLANT

STANDARD OPERATING PROCEDURE

Title: Scrap Management Plan

Instruction #: Melt220CB

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Issue Date: October 3, 2012

Revision #: 01

Date: October 30, 2014

1.0 SCOPE

This plan is designed to meet the requirements under 40 CFR 63.10885 Iron and Steel Foundry Area Source NESHAP Subpart ZZZZZ and as outlined in section 14. G. of Permit 10-A-270-P. This plan outlines how the plant intends to minimize contaminants, especially lead, in metallic scrap processed by the plant.

2.0 SCRAP SPECIFICATIONS

- 2.1 All scrap purchased from vendors will conform to scrap specifications S101CB- Shredded Steel Scrap, S102CB- No2 Metal Scrap and S103CB- Plate & Structural Scrap.
- 2.2 All vendors who supply automotive scrap will be participants in the National Vehicle Mercury Switch Recovery Program to minimize the presence of mercury in purchased scrap.
- 2.3 Unrestricted Scrap, to include factory bundles, demolition debris, home scrap, return scrap, rail, flashings, and similar uncontaminated, non-motor vehicle scrap, are presumed to be free of contaminants.

3.0 VERIFICATION OF COMPLIANCE

- 3.1 Scrap crane operators will follow the Scrap Inspection SOP for inspecting and reporting non-conforming loads.
- 3.2 Non-conforming material such as liquids, non-ferris metal, and plastics are limited by use of magnetic cranes for sorting prior to charging.
- 3.3 Griffin will conduct a semiannual review of the End of Life Vehicle Solutions Database to ensure all vehicle scrap suppliers are active members of the NVMSRP or another EPA approved program, or in the case of a broker, that all vehicle scrap supplied comes from participating members.

4.0 RECORD KEEPING

- 4.1 Scrap crane operators will record visual inspections of rail cars and trucks once per shift on the Scrap Inspection Checklist.
- 4.2 Completed checklists will be kept for a minimum of five (5) years.
- 4.3 Records of rejected loads for reasons of non-conforming content will be kept for a minimum of five (5) years. Reports for non-conforming scrap will follow the Scrap Inspection SOP.



GRIFFIN PIPE PRODUCTS CO.

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Issue Date: October 3, 2012

Revision #: 01

Date: October 30, 2014

Date	Revision #	Description
10/30/2014	01	Review, add Instruction #, S103CB ref, & reissue with new signatures

5.0 REVIEW AND APPROVAL

Douglas Brunow
Production Superintendent

10/31/14
Date

Jeffrey Swing
Operations Manager

10/31/14
Date

Griffin Pipe Administrative Consent Order No. 2015-AQ-02

EPA Rulemakings

CFR:	40 C.F.R. 52.820(d)(110)
FRM:	81 FR 9770 (2/26/16)
PRM:	80 FR 59695 (10/2/15)
State Submission:	2/9/15
State Final:	State effective date 1/29/15
APDB File:	IA-168; EPA-R07-OAR-2015-0582, effective 3/28/16
Description:	EPA approves Administrative Consent Order No. 2015-AQ-02; Griffin Pipe Products
Co., LLC.	