

EPA Finalizes Rules for Iron and Steel Foundries

The Environmental Protection Agency (EPA) promulgated national emission standards for hazardous air pollutants for iron and steel foundries area sources on January 2, 2008 (*73 Federal Register 225*) located in 40 Code of Regulations (CFR) Part 63 Subpart ZZZZZ. This rule will require all sources meeting the applicability requirements within this category to meet hazardous air pollutant emission standards reflecting the application of the generally available control technology (GACT).

You may be subject to this subpart if you own or operate an iron and steel foundry facility at an area source of hazardous air pollutants (HAP). An area source is a facility that has the potential to emit <10 tons per year (TPY) of individual hazardous air pollutants (HAP) or 25 TPY of combined HAP. An iron and steel foundry is defined as a facility or a portion of a facility that melts scrap, ingot, and/or other forms of iron and/or steel and pours the resulting molten metal into molds to produce final or near final shape products for introduction into commerce.

The following facilities are exempt from this rule:

- Research and development facilities
- Operations that only produce non-commerce castings
- Operations associated with nonferrous metal production
 - Nonferrous metal means any pure metal other than iron or any metal alloy for which an element other than iron is its major metal constituent in percent by weight.

Following is a brief summary of the compliance requirements. The final rule provides a more detailed explanation regarding applicability and exemptions and should be reviewed prior to making an applicability determination.

Compliance Requirements

- Different standards apply to large and small foundries. A large foundry has an annual metal melt production greater than 20,000 tons (for an existing affected source) or greater than 10,000 tons (for a new affected source).
- Small Foundries
 - If you use scrap metal in your process, meet the requirements for mercury and other contaminants in the scrap.
 - Do not use a binder chemical formulation that contains methanol as a specific ingredient of the catalyst formulation for a furfuryl alcohol warm box mold or core making line.
- Large Foundries
 - Meet the requirements for mercury, contaminants in scrap other than mercury; binder formulations; particulate matter (PM) or total metal HAP; and opacity.
 - Prepare an operation and maintenance plan.
 - Conduct an initial performance test.

All existing foundries (facilities which started up before September 17, 2007) must comply with the requirements for contaminants in scrap other than mercury and binder formulations by January 2, 2009 and with the requirements for mercury by January 4, 2010. Large existing foundries must comply with the PM and opacity limits within 2 years of the date of the initial notification of size classification. Facilities which started up after September 17, 2007 must comply upon startup.

If you are subject to 40 CFR 63 Subpart ZZZZZ, you must complete and submit notification of size classification by January 2, 2009 (for an existing foundry) or no later than 120 days after startup for a new foundry. The notification form is located on the NDEQ website at www.deq.state.ne.us under Publications & Forms, Air Toxics Program, Applications and Forms. If you are located in the city limits of Omaha or Lancaster County, your notification must be sent to the Omaha Air Quality Control or Lincoln Lancaster County Health Department, respectively.

Please refer to the Federal Register notice containing the final rule and EPA's brochure at <http://www.epa.gov/ttn/atw/area/arearules.html>.