

40 CFR Part 63 - Subpart ZZZZZ NESHAP for Iron and Steel Foundries Area Sources

Promulgation Date: 1/2/08

Rule Summary:

EPA promulgated this rule on January 2, 2008. The NESHAP for iron and steel foundries applies to minor (area) sources of hazardous air pollutants (HAP). An area source of HAP has the potential to emit (PTE) <10 tons per year of a single HAP or <25 TPY of a combination of HAP.

Who is Subject?

An iron and steel foundry that is an area source of HAP emissions (PTE <10 TPY of a single HAP or < 25TPY of a combination of HAP).

Iron and steel foundry means a facility or 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. Research and development facilities, operations that only produce non-commercial castings, and operations associated with nonferrous metal production are not included in this definition.

What Are The Permitting Requirements?

- Iron and steel foundry area sources are not required to obtain a title V permit provided they are not required to obtain a permit for another reason.

Am I a New or Existing Facility?

- **Existing Facility:** the affected source commenced construction or reconstruction before 9/17/07.
- **New Facility:** the affected source commenced construction or reconstruction on or after 9/17/07.
- **If your iron and steel foundry becomes a major source** (as defined in 40 CFR 63.2) **on or after January 2, 2008**, you must meet the requirements of 40 CFR 63, subpart EEEEE.

What is the Compliance Date?

Existing Sources:

- **January 2, 2009**-Must comply with the pollution prevention management practices for metallic scrap in 63.10885(a) and binder formulations in 63.10886.
- **January 4, 2010**-Must comply with the pollution prevention management practices for mercury in 63.10885(b).

New Sources:

- If you are a new source which the initial startup date is **on or before January 2, 2008** you must comply with this subpart by **January 2, 2008**.
- If you are a new source which the initial startup date is **after January 2, 2008** you must comply with this subpart **upon startup of the affected source**.

Am I a Small or Large Foundry?

The rule establishes different requirements for foundries based on size.

- **Existing Sources:**
 - **How to Calculate Annual Melt:** Existing sources (commenced construction or reconstruction before 10/17/07) must look at your facility's metal melt production for calendar year 2008. If that facility's annual metal melt is \leq 20,000 tons you are a small foundry.
 - Your existing foundry is a "**small foundry**" if it has an annual metal melt production of \leq 20,000 tons.
 - Your existing foundry is a "**large foundry**" if it has an annual metal melt production for calendar year 2008 of $>$ 20,000 tons.
- **New sources:**
 - **How to Calculate Annual Melt:** New sources (commenced construction or reconstruction after 10/17/07) must look at your facility's metal melting capacity at startup.
 - Your new foundry is a "**small foundry**" if it has an annual metal melt capacity of \leq 10,000 tons.
 - Your new foundry is a "**large foundry**" if it has an annual metal melt capacity of $>$ 10,000 tons.

What are the Compliance Requirements?

Small Foundries: are required to comply with pollution prevention management practices for metallic scrap, the removal of mercury switches, and binder formulations.

Large Foundries: are required to comply with the same pollution prevention management practices as small foundries in addition to emissions standards for PM or total metal HAP from melting furnaces and opacity limits from foundry operations.

What Reports are Required?

Existing sources:

- Must submit a written notification to the Administrator that identifies your foundry as a small or large foundry by **January 2, 2009**.
- Beginning January 1, 2010, if the annual metal melt production of your small foundry exceeds 20,000 tons during the preceding calendar year, **you must submit a notification of foundry reclassification to the Administrator within 30 days** and comply with the requirements in paragraphs (d)(1)(i) or (ii) (below) as applicable.
 - (i) If your small foundry has never been classified as a large foundry, you must comply with the requirements for a large foundry no later than 2 years after the date of your foundry's notification that the annual metal melt production exceeded 20,000 tons.
 - (ii) If your small foundry had previously been classified as a large foundry, you must comply with the requirements for a large foundry no later than the date of your foundry's most recent notification that the annual metal melt production exceeded 20,000 tons.
- If your facility is initially classified as a large foundry (or your small foundry subsequently becomes a large foundry), you must comply with the requirements for a large foundry for at least 3 years **before reclassifying your facility as a small foundry**, even if your annual metal melt production falls below 20,000 tons. After 3 years, you may reclassify your facility as a small foundry provided your annual metal melt production for the preceding calendar year was 20,000 tons or less. **If you reclassify your large foundry as a small foundry**, you must submit a notification of reclassification to the Administrator within 30 days and comply with the requirements for a small foundry no later than the date you notify the Administrator of the reclassification. **If the annual metal melt production exceeds 20,000 tons during a subsequent year**, you must submit a notification of reclassification to the Administrator within 30 days and comply with the requirements for a large foundry no later than the date you notify the Administrator of the reclassification.

New Sources:

- Must submit a written notification to the Administrator that identifies your foundry as a small or large foundry **no later than 120 days after startup**.
- **If you increase the annual metal melt capacity of your small foundry to exceed 10,000 tons**, you must submit a notification of reclassification to the Administrator within 30 days and comply with the requirements for a large foundry no later than the startup date for the new equipment, if applicable, or the date of issuance for your revised State or Federal operating permit.
- **If your facility is initially classified as a large foundry** (or your small foundry subsequently becomes a large foundry), you must comply with the requirements for a large foundry for at least 3 years before reclassifying your facility as a small foundry. After 3 years, you may reclassify your facility as a small foundry provided your most recent annual metal melt capacity is 10,000 tons or less. If you reclassify your large foundry as a small foundry, you must notify the Administrator within 30 days and comply with the requirements for a small foundry no later than the date your melting equipment was removed or taken out of service, if applicable, or the date of issuance for your revised State or Federal operating permit.