What Reports and Records Are Required?

Reporting:

- Submit a notification of size classification by January 2, 2009 (for an existing foundry) or no later than 120 days after startup for a new foundry.
- Submit a notification of compliance status (including a certification of compliance) for the requirements for contaminants in scrap other than mercury, binder formulations, operation and maintenance plan, and capture system by March 2, 2009 (for an existing source); by March 4, 2010 for mercury; and March 2, 2011 for the PM and opacity limits (unless you must conduct a performance test) for an existing source or 60 days after compliance date (for a new source).
- If you must conduct a performance test, conduct the test by June 2, 2011 (for an existing source) or within 180 days of your compliance date (for a new source) and submit the notification of compliance status within 60 days of completing the test.
- Submit semiannual compliance reports for deviations.
- If you are subject to the site-specific plan for mercury, submit semiannual reports of the number of switches or weight of mercury removed, number of vehicles processed, and an estimate of the percent of mercury switches removed. Also submit a certification that you have performed the required inspections (other means of corroboration) of your scrap providers.
- Submit reports to your permitting authority if your state has accepted delegation of this rule, to the EPA regional office if not, or contact your state representative at the link given in "**For More Information"** if you do not know.

Recordkeeping:

- For site-specific plan for mercury, keep records of mercury removed, vehicles processed, and percent of mercury switches removed.
- Keep records identifying each scrap provider and documenting their participation in an EPA-approved program. If you purchase scrap from a broker, keep records identifying each broker and documenting that the scrap provided by the broker was from scrap providers participating in an approved program.
- Keep records to show compliance with requirements for metallic scrap, binder formulations, metal melt production, and notifications.
- Large foundries must keep records of capture system and control device inspections and maintenance, pounds per ton emissions rate for emission averaging groups, records for bag leak detection systems, and conformance with specifications for monitoring systems.

You can also contact your Regional EPA air toxics office at the following numbers:

Address	States	Website/ Phone Number
Region 1 1 Congress Street Suite 1100 Boston, MA 02114-2023	CT, MA, ME, NH, RI, VT	www.epa.gov/region1 (888) 372-7341 (617) 918-1650
Region 2 290 Broadway New York, NY 10007-1866	NJ, NY, PR, VI	www.epa.gov/region2 (212) 637-4023
Region 3 1650 Arch Street Philadelphia, PA 19103-2029	DE, MD, PA, VA, WV, DC	www.epa.gov/region3 (215) 814-2068
Region 4 Atlanta Federal Center 61 Forsyth Street, SW Atlanta, GA 30303-8960	FL, NC, SC, KY TN, GA, AL, MS	www.epa.gov/region4 (404) 562-9131 (800) 241-1754
Region 5 77 West Jackson Blvd. Chicago, IL 60604-3507	IL, IN, MI, WI, MN, OH	www.epa.gov/region5 (312) 886-6812 (312) 353-6684 (312) 886-6798
Region 6 1445 Ross Avenue Suite 1200 Dallas, TX 75202-2733	AR, LA, NM, OK, TX	www.epa.gov/region6 (800) 887-6063 (214) 665-7250 (214) 665-7224
Region 7 901 North Fifth Street Kansas City, KS 66101	IA, KS, MO, NE	www.epa.gov/region7 (800) 223-0425 (913) 551-7003
Region 8 1595 Wynkoop St. Denver, CO 80202-1129	CO, MT, ND, SD, UT, WY	www.epa.gov/region8 (800) 227-8917* (303) 312-6460
Region 9 75 Hawthorne Street San Francisco, CA 94105	CA, AZ, HI, NV, GU, AS, MP	www.epa.gov/region9 (415) 947-8715
Region 10 1200 6th Ave. Suite 900, AWT-107 Seattle, WA 98101	AK, ID WA, OR	www.epa.gov/region10 (800) 424-4372* (206) 553-6220

* For sources within the Region only.

For More Information

This brochure is a general guide only; review the rule for your specific requirements at:
http://www.epa.gov/ttn/atw/area/arearules.html

For more information on state requirements, please contact your state representatives at: http://www.epa.gov/ttn/atw/area/table_state_contacts.doc or, http://www.4cleanair.org/contactUsaLevel.asp

United States Environmental Protection Agency
April 2008
www.epa.gov/ttn/atw/eparules.html

Office of Air Quality Planning & Standards (EI 43-02)

EPA

Summary of Regulations Controlling Air Emissions from

IRON AND STEEL FOUNDRIES AREA SOURCES

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS NESHAP (SUBPART ZZZZZ)

FINAL RULE

IRON AND STEEL FOUNDRIES AREA SOURCES (SUBPART ZZZZZ)

What Is an Area Source?

- Any source that is not a major source. (A major source is a facility that emits, or has the potential to emit in the absence of controls, at least 10 tons per year (TPY) of individual hazardous air pollutants (HAP) or 25 TPY of combined HAP.)

Who Does This Rule Apply To?

- This rule applies to existing or new iron and steel foundries that are area sources. The affected source is each iron and steel foundry.
- 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). Follow the procedures in the rule to determine your initial size classification or to change your size classification.

What Am I Required To Do for a Small Iron and Steel Foundry?

- Comply with the requirements for mercury, contaminants in scrap other than mercury, and binder formulations. (See Table 1.)

What Am I Required To Do for a Large Iron and Steel Foundry?

- Meet the requirements for mercury, contaminants in scrap other than mercury; binder formulations; particulate matter (PM) or total metal HAP; and opacity. (See Table 1.)
- Prepare operation and maintenance plan.
- Conduct an initial performance test for PM emissions from metal melting furnaces and opacity of emissions from foundry operations, or submit the result of a prior performance test if it was conducted within the past 5 years using the procedures specified in the rule.

Table 1. National Air Toxics Standards for Iron and Steel Foundries 40 CFR 63, Subpart ZZZZZ

For...	You must...
Mercury	Comply with one of the following options for each scrap provider, contract or shipment. You may have one scrap provider, contract or shipment subject to one option and others subject to other options. 1. Prepare, submit for approval, and implement a detailed site-specific plan for the removal of mercury switches from motor vehicle scrap; 2. Certify that you participate in and purchase motor vehicle scrap only from scrap providers who participate in an EPA-approved program for the removal of mercury switches; 3. Certify that the only materials from motor vehicles in the scrap are those recovered for their specialty alloy content and that the scrap is not reasonably expected to contain mercury switches; or 4. Certify that the scrap does not contain motor vehicle scrap.
Contaminants in scrap other than mercury	Comply with one of the following options. You may have certain scrap subject to one option and other scrap subject to the other option if the scrap remains segregated until charge make-up. 1. Prepare and operate by written material specifications for the purchase and use of only materials that do not include post-consumer automotive body scrap, engine blocks, oil filters, oily turnings, lead components, chlorinated plastics, or free liquids. 2. Prepare and operate by written material specifications for the purchase and use of only iron and steel scrap that has been depleted (to the extent practicable) of organics and HAP metals in the charge materials used by the foundry.
Binder formulations	• 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. (This does not apply to the resin portion of the binder system.)
Particulate matter (PM) (Large foundries only)	• Install, operate, and maintain a capture system that collects emissions from each metal melting furnace (except for an uncontrolled furnace in an emissions averaging group). • For an existing foundry, meet a PM limit of 0.8 pounds of PM per ton of metal charged or 0.06 pounds of total metal HAP per ton of metal charged for each metal melting furnace or group of metal melting furnaces. • For a new foundry, meet a PM limit of 0.1 pounds of PM per ton of metal charged or 0.008 pounds of total metal HAP per ton of metal charged.
Opacity (Large foundries only	Maintain the opacity of fugitive emissions from foundry operations no greater than 20 percent (except for one 6-minute average per hour up to 30 percent).

- For an existing foundry, make initial and subsequent visual inspections of PM control devices for metal melting furnaces. A new foundry must monitor control device operating parameters or install bag leak detection systems.

Are Title V Permits Required?

- No, provided you are not otherwise required to obtain a permit under 40 CFR part 70 or 71.

What Are The Compliance Dates?

- All existing foundries 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.
- New sources (affected sources constructed since September 17, 2007) must comply by January 2, 2008 or upon startup if startup occurs after January 2, 2008.
- Large existing foundries must comply with the PM and opacity limits within 2 years of the date of the initial notification of size classification.