



## Initial Notification/Compliance Status NESHAP for Iron and Steel Foundry Area Sources 40 CFR Part 63, Subpart ZZZZZ (Parts 63.10880 – 63.10906)

### Instructions

#### 1. Who Must Complete This Form?

On January 2, 2008, the U.S. Environmental Protection Agency (U.S. EPA) promulgated a National Emissions Standard for Hazardous Air Pollutants (NESHAP) for iron and steel foundries. Iron and steel foundries that meet the definition of an area source are required to submit notifications to the U.S. EPA and the Michigan Department of Environmental Quality (DEQ).

#### 2. Definitions

An **iron and steel foundry** is 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 sale. Research and development facilities, operations that only produce non-commercial castings, and operations associated with nonferrous metal production are not included in this definition.

An **area source** has the potential to emit less than 10 tons per year of a single hazardous air pollutant (HAP) and less than 25 tons per year of any combination of HAPs. If a facility emits more than these amounts, they are "*major sources*" and not subject to this Rule.

An **existing source** means that the foundry startup or reconstruction occurred *on or before* September 17, 2007.

A **new source** means the initial startup of the foundry or reconstruction occurred *after* September 17, 2007.

**Reconstruction** means that the fixed capital costs exceed 50 percent of the fixed capital cost that would be required to construct a comparable new foundry.

**Small and Large Foundries.** If your foundry is an existing source, determine your metal melt production for the calendar year 2008. If the production is equal to or less than 20,000 tons, then your foundry is considered *small*. If production is more than 20,000 tons, it is considered *large*. If your foundry is a new source and the annual melt capacity is equal to or less than 10,000 tons, then your foundry is considered *small*. If it is more than 10,000 tons, then your foundry is considered *large*.

Annual metal melt production means the total quantity of metal charged to all metal melting furnaces at the foundry in a given calendar year.

Annual metal melt capacity depends on whether or not the furnace(s) are permitted by the DEQ, Air Quality Division. If not, then the capacity is determined by assuming the furnaces are operating at 8,760 hours per year. If they are permitted, then the capacity is determined by the maximum permitted production rate calculated on an annual basis. If the permit limits the operating hours of the furnaces, then the permitted hours are used in annualizing the maximum permitted metal production rate.

#### 3. What Sections of the Form Must Be Completed?

This form is a combined form that can be used to satisfy the following requirements for both small and large foundries.

1. Initial Notification (Part A of form)
2. Notification of Size Classification (Part B of form)
3. Notification of Compliance Status: Management Practices for Metallic Scrap and Binder Formulation (Part C of form)
4. Notification of Compliance Status: Management Practices for Mercury Switch Removal (Part D of form)

## INITIAL NOTIFICATION / COMPLIANCE STATUS

Always complete the Facility Information and Certification sections of the form each time you submit the form. One form submittal can address more than one of the four notification requirements. For example, if you did not complete an Initial Notification on time, you can take care of that requirement when making your Notification of Size Classification. In this example, you would complete Parts A and B of the form. It is recommended that you comply with all of the notifications, even if the deadline has passed.

There are additional notification requirements for iron and steel foundries that are designated as “large.” Below is a table summarizing the types of notification and due dates. This form cannot be used to comply with these notification requirements. Refer to the NESHAP to identify what information must be submitted.

<b>Other Notifications Applicable to Large Foundries Only</b>		
<b>Notifications</b>	<b>Existing Sources</b>	<b>New Sources</b>
Notification of intent to use previous test data instead of conducting new performance test.	March 3, 2011	Not applicable to new sources.
Notification of opacity test.	May 1, 2011	May 1, 2008, or 60 days prior to conducting test, whichever is later.
Notification of Particulate Matter (PM)/total metal HAP performance test.	May 1, 2011	May 1, 2008, or 60 days prior to conducting test, whichever is later.
Conduct performance test.	July 1, 2011	July 1, 2008, or 180 days after startup, whichever is later.
Notification of compliance status for emission limits, capture and collection system, O&M plan, and bag leak detection system monitoring plan (if applicable).	July 31, 2011 (i.e., no later than 30 days after the initial test if only an opacity test is conducted and no new PM or total metal HAP test is conducted) or August 30, 2011 (i.e., no later than 60 days after the initial test if a new PM or total metal HAP test is conducted).	August 30, 2008, or 60 days after the initial test, whichever is later.

### 4. When Must This Form Be Submitted?

The following table explains the type of notifications required by the NESHAP for Iron and Steel Foundry Area Sources and the date on which the notifications are due. The due dates are dependent upon whether your area source is new or existing.

<b>Area Source Type</b>	<b>Type of Notification and Due Dates</b>			
	<b>Initial Notification (Part A of form)</b>	<b>Notification of Size Classification (Part B of form)</b>	<b>Compliance Status: Metallic Scrap and Binder Formulation (Part C of form)</b>	<b>Compliance Status: Mercury Switch Removal (Part D of form)</b>
Existing	May 1, 2008	January 2, 2009	February 1, 2009	February 3, 2010
New	May 1, 2008 or not later than 120 days after startup.	Not later than 120 days after startup.	February 1, 2008 or not later than 30 days after startup, whichever is later.	February 1, 2008 or not later than 30 days after startup, whichever is later.

## 5. Where Do I Send The Completed Form?

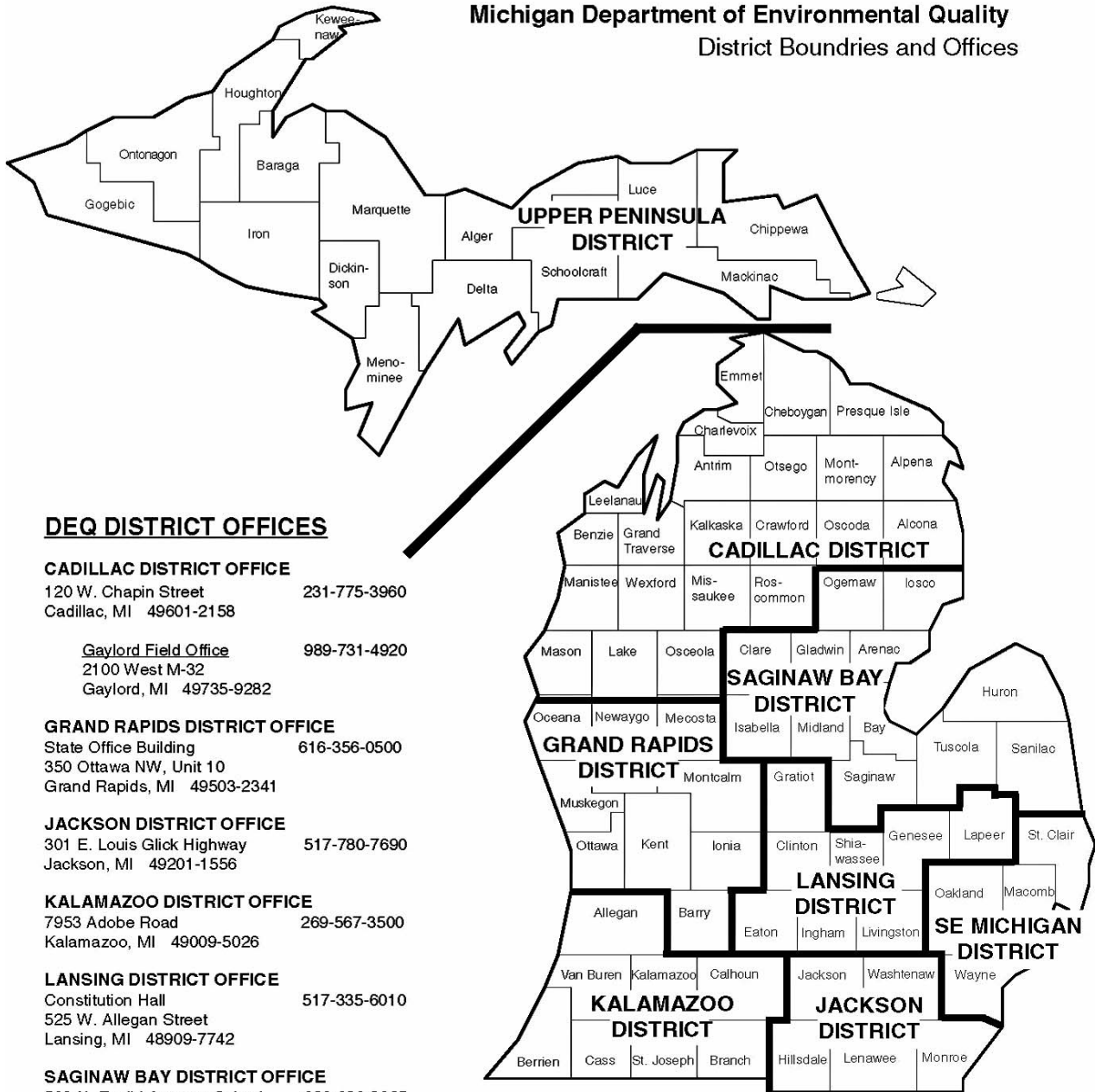
Please make copies of this completed form and submit the original signed copy by U.S. mail, or by another courier, to the appropriate Michigan Department of Environmental Quality, Air Quality Division Office (See Attachment A). Send the form to the attention of the "AQD District Supervisor." In addition, send a copy to the U.S. EPA Region 5 Office at the following address:

George Czerniak, Chief  
U.S. EPA Region 5,  
Compliance Tracker (AE-17J)  
77 West Jackson Blvd.  
Chicago, IL 60604

# APPENDIX A

## Contact Information

Michigan Department of Environmental Quality  
District Boundries and Offices



### DEQ DISTRICT OFFICES

#### CADILLAC DISTRICT OFFICE

120 W. Chapin Street 231-775-3960  
Cadillac, MI 49601-2158

Gaylord Field Office 989-731-4920  
2100 West M-32  
Gaylord, MI 49735-9282

#### GRAND RAPIDS DISTRICT OFFICE

State Office Building 616-356-0500  
350 Ottawa NW, Unit 10  
Grand Rapids, MI 49503-2341

#### JACKSON DISTRICT OFFICE

301 E. Louis Glick Highway 517-780-7690  
Jackson, MI 49201-1556

#### KALAMAZOO DISTRICT OFFICE

7953 Adobe Road 269-567-3500  
Kalamazoo, MI 49009-5026

#### LANSING DISTRICT OFFICE

Constitution Hall 517-335-6010  
525 W. Allegan Street  
Lansing, MI 48909-7742

#### SAGINAW BAY DISTRICT OFFICE

503 N. Euclid Avenue, Suite 1 989-686-8025  
Bay City, MI 48706-2925

#### SOUTHEAST MICHIGAN DISTRICT OFFICE

27700 Donald Court 586-753-3700  
Warren, MI 48092-2793

Detroit Field Office 313-456-4700  
Cadillac Place  
3058 West Grand Boulevard, Suite 2-300  
Detroit, MI 48202-6058

#### UPPER PENINSULA DISTRICT OFFICE

420 5th Street 906-346-8300  
Gwinn, MI 49841

#### ENVIRONMENTAL ASSISTANCE CENTER

(for general information):

Telephone: 800-662-9278  
Fax: 517-241-0673

#### POLLUTION EMERGENCIES

Telephone: 800-292-4706

#### DEQ WEB PAGE

[www.michigan.gov/deq](http://www.michigan.gov/deq)



**INITIAL NOTIFICATION/COMPLIANCE STATUS  
NESHAP for Iron and Steel Foundry Area Sources**

40 CFR Part 63, Subpart ZZZZZ (Parts 63.10880 – 63.10906)

Please review the Instructions before completing this form. Please print or type all information.

**FACILITY INFORMATION**

**Company Information**

Company Name: \_\_\_\_\_  
Mailing Address: \_\_\_\_\_ Telephone Number: \_\_\_\_\_  
City: \_\_\_\_\_ Fax Number: \_\_\_\_\_  
State: \_\_\_\_\_ Zip: \_\_\_\_\_

Please check whether the area source is a new or existing source:  New Source (Date of Startup: \_\_\_\_\_)  
(refer to Instructions for definitions)  Existing Source

**Owner/Operator Information**

Name: \_\_\_\_\_  
Mailing Address: \_\_\_\_\_ Telephone Number: \_\_\_\_\_  
City: \_\_\_\_\_ E-mail: \_\_\_\_\_  
State: \_\_\_\_\_ Zip: \_\_\_\_\_

Please check whether the person listed above is owner or operator of the area source:  Owner  Operator

**Facility Location Information (If different from Company Information)**

Company Name: \_\_\_\_\_  
Street Address: \_\_\_\_\_ County: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

**Furnace Type and Capacity Information**

Identify the type and capacity of each of your metal melting furnaces at the above location:

Furnace Type	Capacity (Tons/Hour)

**PART A – INITIAL NOTIFICATION**

I understand that I am subject to 40 CFR Part 63, Subpart ZZZZZ, National Emissions Standards for Hazardous Air Pollutants for Iron and Steel Foundry Area Sources.

Please Initial Here: \_\_\_\_\_

**PART B – NOTIFICATION OF SIZE CLASSIFICATION**

If an Existing Source, Facility Metal Melt Production for 2008: \_\_\_\_\_ (tons)

Check one:  Small Foundry (≤20,000)  Large Foundry (>20,000)

If a New Source, Annual Metal Melt Capacity at Startup: \_\_\_\_\_ (tons)

Check one:  Small Foundry (≤10,000)  Large Foundry (>10,000)

**PART C – NOTIFICATION OF COMPLIANCE STATUS**

**MANAGEMENT PRACTICES FOR METALLIC SCRAP AND BINDER FORMULATION**

Check all that apply:

- Yes, the foundry referenced above has prepared and is operating in compliance with written material specifications for metallic scrap according to §63.10885(a)(1) of Subpart ZZZZZ.
- Yes, the facility referenced above has prepared and is operating in compliance with written material specifications for general iron and steel scrap according to §63.10885(a)(2) of Subpart ZZZZZ.
- Yes, the facility referenced above has prepared, and is operating in compliance with the no methanol requirement for the catalyst portion of each binder chemical formulation for a furfuryl alcohol warm box or core making line according to §63.10886 of Subpart ZZZZZ.

**PART D - NOTIFICATION OF COMPLIANCE STATUS**

**MANAGEMENT PRACTICES FOR MERCURY SWITCH REMOVAL**

Check all that apply:

- Yes, the facility referenced above has prepared and is operating in compliance with written material specifications for the removal of mercury switches and a site-specific plan implementing the material specifications according to §63.10885(b)(1) of Subpart ZZZZZ.
- Yes, the facility referenced above participates in and purchases motor vehicle scrap only from scrap providers who participate in a program for removal of mercury switches that has been approved by the Administrator according to §63.10885(b)(2) of Subpart ZZZZZ and has prepared a plan for participation in an U.S. Environmental Protection Agency (U.S. EPA)-approved program according to §63.10885(b)(2)(iv) of Subpart ZZZZZ.
- Yes, the only materials from motor vehicles in the scrap charged to a metal melting furnace at the facility referenced above are materials recovered for their specialty alloy content in accordance with §63.10885(b)(3) of Subpart ZZZZZ which are not reasonably expected to contain mercury switches.
- Yes, the facility referenced above complies with the requirements for scrap that does not contain motor vehicle scrap in accordance with §63.10885(b)(4) of Subpart ZZZZZ.

**CERTIFICATION**

I certify that the statements and information in this report are true, accurate, and complete.

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Name of "Responsible Official"* (print or type)	Title
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Signature of "Responsible Official"	Date
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\*A "Responsible Official" can be:

- The president, vice-president, secretary, or treasurer of the company who owns the facility.
- The owner of the facility.
- The facility engineer or supervisor.
- A government official if the plant is owned by the federal, state city or county government.
- A ranking military officer if the plant is located on a military base.

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