

INFORMATION FOR TECHNICAL REVIEW – FOUNDRY PROCESS

Guidance for Permit Applicants

The following information will be used for the technical review of a Permit to Install application for **a foundry process**. This information is in addition to the general requirements outlined in the AQD document “Information for an Administratively Complete Permit to Install Application”, Part 2 - Additional Supporting Information, Items A through F. All the information may not be needed for each application. Also, this document may not be all inclusive. Additional information beyond that identified may be necessary to complete the technical review of any individual application. In the event a determination is made that new additional information is needed for a technical review, this document will be updated.

All referenced guidance documents are available on the Air Quality Division (AQD) website at [AQD Permits to Install / New Source Review](#) or you may contact the Permit Section at 517-284-6795.

A. Process Description

1. Provide a complete project description including the name of the company, type of foundry category (i.e., gray iron, ductile iron, malleable iron, steel foundry, secondary aluminum production, or secondary copper production), and the types and volumes of products that are manufactured.
2. Describe each of the individual foundry processes. (i.e., charging; preheating; melting; metal treatment including inoculation; pouring, cooling and shakeout; mold and core making; sand handling and preparation; cleaning and finishing; and casting coating). At a minimum include the process description, a list of process equipment with name and model (if available), capacity, materials description and process throughput in tons per hour and tons per year, air pollution control equipment, and discharge points or stacks. Identify which processes and/or equipment are new, any modifications to existing processes or process equipment, and/or production changes.
3. Provide process flow diagrams or equipment layout drawings which clearly show the process flow relationships among all pieces of process and air pollution control equipment.
4. Discuss the possibilities of process upsets or other events that could cause non-routine emissions. Include the duration and frequency of any upsets or other events, and consequences (including estimated amounts and identification of air emissions).
5. Discuss any fugitive emissions and the methods used to minimize them.
6. Include a Preventative Maintenance and Malfunction Abatement Plan for the process, if applicable (recommended for all control equipment).

B. Regulatory Discussion

The following state air pollution control regulations may be applicable. Please review these regulations carefully to determine if they apply to your process and summarize the results in the application. The Air Pollution Control Rules may be viewed from the [AQD website](#). Click on ‘State Air Laws and Rules.’

1. State of Michigan, Department of Environment, Great Lakes, and Energy, Act 451 of 1994, Natural Resources and Environmental Protection Act, Part 55 Air Pollution Control and the following promulgated rules:
 - a) Rules 215 and 216 apply to an existing facility which has a current Renewable Operating Permit (ROP). A Permit to Install issued for the installation of new equipment or modifications to existing equipment is incorporated into an ROP pursuant to Rules 215 and 216.
 - b) Rules 1901 - 1908 apply to a major source and/or a major modification at a source which is in a nonattainment area. A nonattainment area is one where the National Ambient Air Quality Standards (NAAQS) are not being met. These rules require compliance with the lowest achievable emission rate (LAER) and an emission reduction (offset) for each nonattainment air contaminant emitted in significant quantities as defined by Rule 119(e). However, a source may choose to “net out” of the requirements of these rules. For additional detailed information regarding “netting”, refer to Chapter 5 of the document entitled “PSD Workbook: A Practical Guide to Michigan’s Prevention of Significant Deterioration Regulations”, May 2014. This guide is referred to as the AQD’s PSD Workbook and can be found on the [Permits to Install \(PTI\) / New Source Review \(NSR\)](#) webpage. Click on ‘Application Form Instructions & Guidance Documents’. Although the guidance document is regarding Michigan’s PSD regulations, the netting analysis performed for nonattainment NSR is the same as that performed for PSD.

- c) Rules 1801 – 1823 apply to a major source and/or a major modification at a source which is in an attainment area. An attainment area is one where the NAAQS are being met. These rules require compliance with Best Available Control Technology (BACT) and a demonstration that the proposed emissions will not contribute to the deterioration of air quality and will not violate any NAAQS or Prevention of Significant Deterioration (PSD) increment. Refer to the [AQD's PSD Workbook](#) for additional detailed information. However, a source may choose to “net out” of the requirements of the PSD rules. For additional detailed information regarding “netting”, refer to Chapter 5 of the [AQD's PSD Workbook](#) for additional detailed information.
 - d) If the process or equipment was installed or modified after April 17, 1992, Rules 224 – 230 apply. Rule 224 requires the application of Best Available Control Technology for toxics (T-BACT) for all non-VOC toxic air contaminants (TACs). T-BACT does not apply to emissions of VOCs. Rule 225 limits the emission impacts of TACs and requires a demonstration that the proposed emission of each TAC complies with a health-based screening level. Compliance can be demonstrated using any of three methods described in Rule 227(1) including the use of computerized dispersion modeling. Refer to “Guidelines for Conducting a Rule 224 T-BACT Analysis,” “TACs-Demonstrating Compliance with Rule 225,” and “Dispersion Modeling Guidance” for additional detailed information.
 - e) If the process or equipment was installed or modified after August 1, 1979, Rule 702 applies. This rule requires Best Available Control Technology (BACT) for new sources of VOCs. Refer to “Guidelines for Conducting a Rule 702 BACT Analysis” for additional detailed information.
 - f) Rule 901 prohibits emissions of an air contaminant in quantities that cause either a) injurious effects to human health or safety, animal life, plant life of significant economic value, or property; or b) unreasonable interference with the comfortable enjoyment of life and property.
2. The PSD increments (40 CFR 52.21 (c)) and the NAAQS (40 CFR 52.21(d)) apply to all sources throughout the United States, regardless of size. Compliance with these air quality standards can be demonstrated using computerized dispersion modeling. An applicant for a PSD permit is required to submit PSD increment modeling for PM₁₀, PM_{2.5}, SO₂ and NO_x, and NAAQS modeling for PM₁₀, PM_{2.5}, SO₂, NO_x, CO, Ozone, and Lead as part of the application. Modeling for sources not subject to PSD may be done by the AQD. Refer to “Dispersion Modeling Guidance” for additional detailed information.
 3. Federal Standards of Performance for New Stationary Sources (NSPS), 40 CFR Part 60, may contain general requirements for various foundry facilities. These federal regulations should be consulted carefully to determine applicability to your process.
 4. National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart EEEEE, Iron and Steel Foundries, may contain requirements for foundry facilities. This regulation is available on the United States Environmental Protection Agency (USEPA) Website at [Iron and Steel Foundries NESHAP](#). These federal regulations should be consulted carefully to determine applicability to your process.
 5. NESHAP, 40 CFR Part 63, Subpart RRR, Secondary Aluminum, may contain requirements for foundry facilities. This regulation is available on the USEPA Website at [Secondary Aluminum Production NESHAP](#). These federal regulations should be consulted carefully to determine applicability to your process.
 6. Section 112(g) regulations of the federal Clean Air Act (CAA) require any constructed or reconstructed major source of Hazardous Air Pollutants (HAPs) be equipped with Maximum Achievable Control Technology (MACT) for individual and total HAPs greater than 10 and 25 tons per year, respectively, if a specific MACT does not apply. Refer to “Guidelines for Conducting a 112(g) Analysis” and Policy and Procedure AQD-015 [Procedure for Processing PTI Applications Subject to Federal Clean Air Act Section 112\(g\)](#) for additional detailed information.

C. Control Technology Analysis

1. Rule 702 BACT applies to all sources of VOCs proposed to be installed within the State of Michigan. A Rule 702 BACT analysis is very similar to a PSD top-down BACT analysis. Michigan’s air pollution control rules also define BACT as an emission limit. Rule 702 BACT should be applied on a flexible grouping of equipment – subdivisions of emission units and/or groupings of emission units – if it is logical to do so. Logical means that the principles on which the groupings (or subdivisions) are made are consistent with federal guidance and sound engineering practices. Refer to “Instructions for Conducting a 702 BACT Analysis” for additional detailed information.
2. Best Available Control Technology for Toxics (T-BACT) means the maximum degree of emission reduction which the Department determines is reasonably achievable for each process that emits toxic air contaminants (TACs) considering energy, environmental and economic impacts, and other costs. T-BACT does not apply to VOCs. The analysis must be

specific to the process and the TACs subject to a T-BACT review. T-BACT limits can be expressed as an emission limit, control equipment requirements, and/or work practice standards. Refer to “Guidelines for Conducting a Rule 224 T-BACT Analysis” for additional detailed information.

3. Lowest achievable emission rate (LAER) applies to a major source and/or a major modification at a source located in a non-attainment area. Please see the [Attainment Status Map](#) on the [AQD website](#) for the current nonattainment status in Michigan. LAER is defined as the lowest emission limitation contained in any State Implementation Plan (SIP) or the lowest emission limitation achieved in practice. Such an emission limit is presumed to be LAER for that source class and category. If an applicant proposes to meet this presumptive LAER, no site-specific control technology determination will be necessary. When an applicant believes the presumptive LAER limit is not achievable, a site-specific determination is required. This determination should include consideration of raw material changes, process changes, and add-on control equipment. The cost of these changes is not considered. Raw material and process changes should be evaluated through technology transfer (i.e., the likelihood that such a change will transfer from one industry to another), based on the manufacture of similar products or use of similar raw materials or fuels. Add-on controls should be evaluated based on the physical and chemical characteristics of the pollutant-bearing exhaust stream.
4. PSD Top-down BACT applies to a major source and/or a major modification at a source of any regulated New Source Review pollutant located in an attainment area. The Clean Air Act defines BACT as “an emission limitation based on the maximum degree of reduction for each pollutant.” BACT should be applied to a flexible grouping of equipment – subdivisions of emission units and/or groupings of emission units – if it is logical to do so. Logical means that the principles on which the groupings (or subdivisions) are made are consistent with federal guidance and sound engineering practices. Refer to Chapter 7 of the [AQD's PSD Workbook](#) for additional detailed information.

D. Emissions Summary and Calculations

Estimate the maximum uncontrolled and controlled emission rates of each of the following pollutants, in pounds per hour and tons per year for each process or emission unit. Provide all assumptions, calculations, stack tests, and other documentation used to derive these estimates.

1. Particulate matter as total suspended particulate
2. Particulate matter as PM₁₀ (particulate diameter less than 10 microns)
3. Particulate matters as PM_{2.5} (particulate diameter less than 2.5 microns)
4. Sulfur dioxide (SO₂)
5. Nitrogen oxides, expressed as NO₂
6. Carbon monoxide (CO)
7. VOCs
8. Lead (Pb)
9. HAPs

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