

Initial Notification Report

NESHAP: Areas Source Standards for Aluminum, Copper, and Other Nonferrous Foundries

40 CFR Part 63, Subpart ZZZZZZ (§ 63.11544 – 63.11557)

Instructions

1. Who Must Complete This Form?

On June 25, 2009, the U.S. Environmental Protection Agency (U.S. EPA) promulgated a National Emissions Standard for Hazardous Air Pollutants (NESHAP) for aluminum, copper, and other nonferrous foundries that meet the definition of an area source. This Notification must be sent to the U.S. EPA and the Michigan Department of Environmental Quality (DEQ).

2. Definitions

Annual metal melt production means the quantity of aluminum, copper and other nonferrous metal melted in melting operations at an existing 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.

An **aluminum foundry** means a facility that melts aluminum and pours molten aluminum into molds to manufacture aluminum castings (except die casting) that are complex shapes. This definition does not include primary or secondary metal producers that cast molten aluminum to produce simple shapes such as sows, ingots, bars, rods, or billets.

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.

A **copper foundry** means a facility that melts copper or copper-based alloys and pours molten copper or copper-based alloys into molds to manufacture copper or copper-based alloy castings (excluding die casting) that are complex shapes. This definition does not include primary or secondary metal producers that cast molten copper to produce simple shapes such as sows, ingots, bars, rods, billets, anode copper, or copper cake.

An **existing source** means that the foundry construction or reconstruction occurred *on or before* February 9, 2009.

Material containing aluminum foundry HAP means any material containing beryllium, cadmium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), or contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material, is considered to be a material containing aluminum foundry HAP.

Material containing copper foundry HAP means any material contains lead or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), or contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material, is considered to be a material containing copper foundry HAP.

Material containing other nonferrous foundry HAP means any material containing chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material, is considered to be a material containing other nonferrous foundry HAP.

A **new source** means the foundry construction or reconstruction occurred *after* February 9, 2009.

Other nonferrous foundry means a facility that melts nonferrous metals other than aluminum, copper, or copper-based alloys and pours the nonferrous metals into molds to manufacture nonferrous castings (excluding die casting) that are complex shapes. This definition does not include primary or secondary metal producers that cast molten nonferrous metals to produce simple shapes such as sows, ingots, bars, rods, or billets.

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. The definitions of large and small only pertain to copper and other nonferrous foundries. If your foundry is an **existing** source, determine your metal melt production for the calendar year 2010. If the production is equal to or more than 6,000 tons per year, then your foundry is considered **large**. If production is less than 6,000 tons, it is considered **small**. If your foundry is a **new** source and the annual melt capacity is equal to or more than 6,000 tons, then your foundry is considered **large**. If it is less than 6,000 tons, then your foundry is considered **small**.

3. Completing the Format Sections of the Form Must Be Completed and When?

Please complete company and owner information. The state registration number is an alpha-numeric number the DEQ's Air Quality Division assigns to a facility. This number gets assigned when a facility submits their first air permit application or submits and reports under the Michigan Air Emissions Reporting System. If you do not know, please leave blank.

Part A: Am I Subject to Subpart ZZZZZZ?

Your foundry is subject to the NESHAP if it is an area source, it uses material containing aluminum, copper or nonferrous metal foundry HAP and has an annual metal melt production or annual metal melt capacity of at least 600 tons per year of aluminum, copper and nonferrous metals.

If your foundry is existing source, then you must determine if you are subject to the rule based on your annual metal melt production for calendar year 2010. If your foundry is new source, then applicability is based upon the annual metal melt capacity at startup.

If you checked "yes" please identify whether your foundry is a new or existing source. If existing, you have until June 27, 2011 to be in compliance with the requirements of Subpart ZZZZZZ. If new, you need to be in compliance upon startup.

If your facility is not subject the Subpart ZZZZZZ, please identify why it is not subject to the rule.

Part B: Identification of Affected Operations

Identify the melting operations at your facility and for those copper and nonferrous foundries, identify whether they are small or large.



Please complete the certification portion of the form. Please do not forget to sign the document.

4. When Must This Form Be Submitted?

For existing sources, the form was due on October 25, 2010. Please submit even though you may have missed the deadline. For new sources, submittal of the Initial notification is due 120 days after startup.

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:

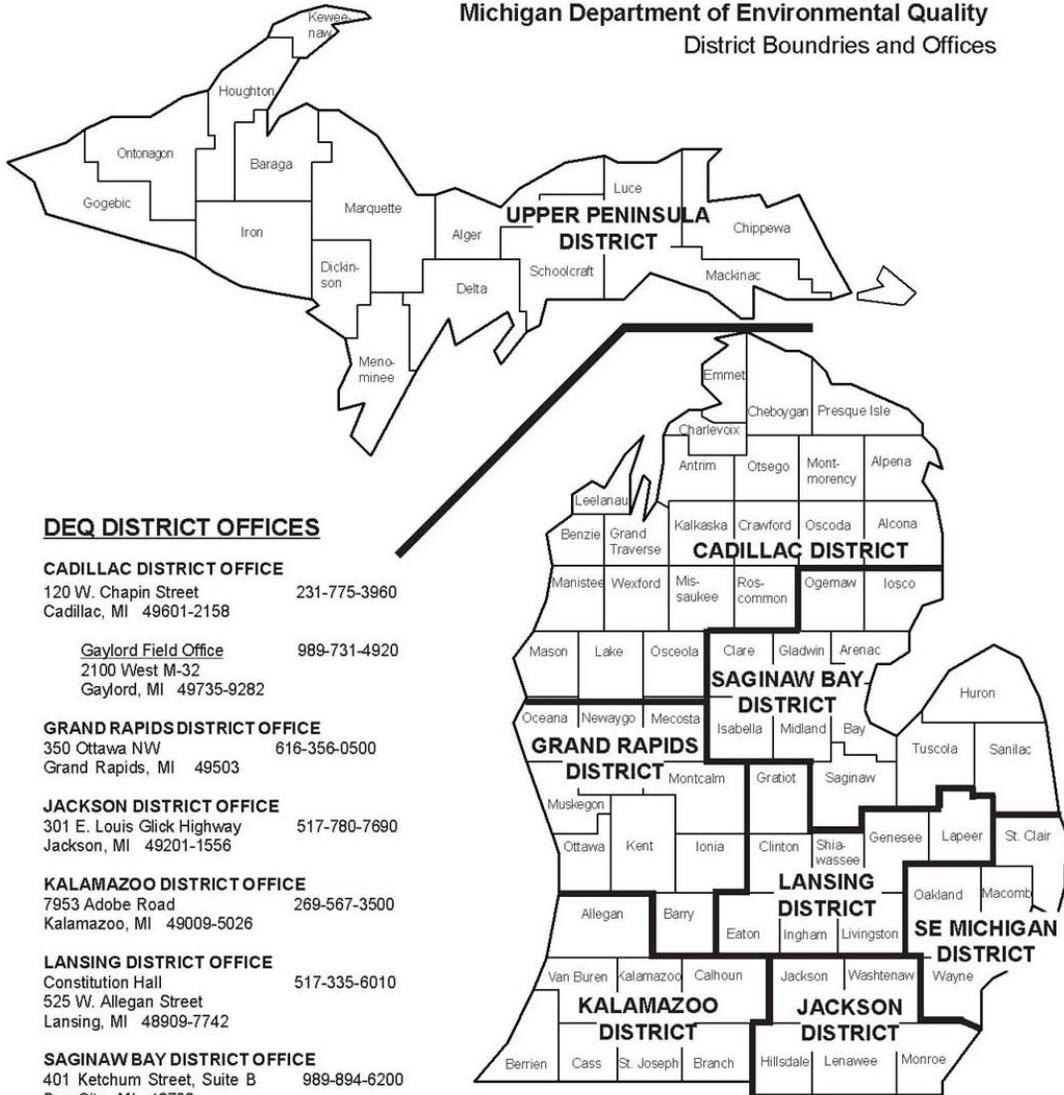
George Czerniak, Chief
U.S. EPA Region 5
Compliance Tracker (AE-17J)
77 West Jackson Blvd.
Chicago, IL 60604



ATTACHMENT 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

350 Ottawa NW 616-356-0500
Grand Rapids, MI 49503

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

401 Ketchum Street, Suite B 989-894-6200
Bay City, MI 48708

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



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NESHAP: Areas Source Standards for Aluminum, Copper,
and other Nonferrous Foundries
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Please review the instructions before completing this form. Please print or type all information.

COMPANY INFORMATION

Company Information

Business Name: _____		Telephone Number: _____	
Mailing Address: _____		E-mail: _____	
City: _____	State: _____	Zip: _____	

Facility Location Information (If different from Company Information)

Business Name: _____		County: _____	
Street Address: _____		City: _____	
City: _____	State: _____	Zip: _____	

State Registration Number (SRN): _____

PART A – AM I SUBJECT OT SUBPART ZZZZZZ?

Yes, I am subject to 40 CFR, Part 63, Subpart ZZZZZZ, also known as the National Emission Standards for Hazardous Air Pollutants (NESHAP): Area Source Standards for Aluminum, Copper, and Other Nonferrous Foundries.

Existing Source New Source Date of Construction or Reconstruction: _____

No, I am NOT subject to 40 CFR, Part 63, Subpart ZZZZZZ, also known as the National Emission Standards for Hazardous Air Pollutants (NESHAP): Area Source Standards for Aluminum, Copper, and Other Nonferrous Foundries, for the following reason(s):

- Major source of HAP emissions.
- Existing source and annual metal melt production for calendar year 2010 was <600 tons.
- New source and annual metal melt capacity at startup was <600 tons.
- Do not melt any materials containing aluminum, copper, and/or other nonferrous foundry HAPs.
- Other: _____

If you checked "No" above, please skip part B of this form and proceed to Certification.



PART B – IDENTIFICATION OF AFFECTED OPERATIONS

Operations at this facility subject to Subpart ZZZZZZ:

Melting operations in the production of:

- Aluminum
- Copper
- Other Nonferrous Metals

If you selected Copper and/or Other Nonferrous metals, identify the size of your facility (see Definitions): Small Large

CERTIFICATION

I certify the truth, accuracy, and completeness of the information being submitted. The facility is in compliance with all relevant standards of 40 CFR, Part 63, Subpart ZZZZZZ.

Signature Date

Printed Name Title

Address: _____

City, State, Zip: _____

Telephone Number: _____ E-mail: _____

I am the: Owner Operator Certifying Official

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 of the Instructions). 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