



MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

Air Quality Division

Initial Notification and Notification of Compliance Status NESHAP for Iron and Steel Foundry Area Sources

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

Instructions

1. Who Must Complete This Form?

On January 2, 2008, the United States Environmental Protection Agency (USEPA) 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 Semiannual Compliance Reports to the USEPA and the Michigan Department of Environment, Great Lakes, and Energy (EGLE).

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 EGLE, 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.

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)

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 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.

Table 1. Other Notifications Applicable to Large Foundries Only

Notifications	Existing Sources	New Sources
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.

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.

Table 2. Type of Notification and Due Dates

Area Source Type	Initial Notification (Part A of form)	Notification of Size Classification (Part B of Form)	Compliance Status: Metallic Scrap and Binder Formulation (Part C of form)	Compliance Status: Mercury Switch Removal (Part D of form)
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.

Where Do I Send the Completed Form?

In accordance with the September 10, 2020 technology review, beginning on March 9, 2021, you must submit all subsequent compliance, notification and semiannual reports to the USEPA via the Compliance and Emissions Data Reporting Interface (CEDRI). You must also submit reports to the appropriate Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division district office (see Attachment A). Send the form to the attention of the “AQD District Supervisor.”

Attachment A – Air Quality Division District Office Contact Information

District	Contact Information
Bay City District	<p>401 Ketchum Street, Suite B Bay City, MI 48708-5430</p> <p>Contact: 989-798-0782 or 989-439-2282</p> <p>Counties: Arenac, Bay, Clare, Gladwin, Huron, Iosco, Isabella, Midland, Ogemaw, Saginaw, Sanilac, and Tuscola</p>
Cadillac District	<p>120 West Chapin Street Cadillac, MI 49601-2158</p> <p>Contact: 989-798-0872 or 231-492-5954</p> <p>Counties: Benzie, Grand Traverse, Kalkaska, Lake, Leelanau, Manistee, Mason, Missaukee, Osceola, and Wexford</p>
Detroit District	<p>Cadillac Place, Suite 2-300 3058 West Grand Blvd. Detroit, MI 48202-6058</p> <p>Contact: 313-456-4681</p> <p>Counties: Wayne</p>
Gaylord District	<p>2100 West M-32, Gaylord, MI 49735-9282</p> <p>Contact: 989-798-0872, or 231-492-5954</p> <p>Counties: Alcona, Alpena, Antrim, Charlevoix, Cheboygan, Crawford, Emmet, Montmorency, Oscoda, Otsego, Presque Isle, and Roscommon</p>
Grand Rapids District	<p>350 Ottawa Avenue NW, Unit 10 Grand Rapids, MI 49503-2316</p> <p>Contact: 616-356-0500 (Receptionist), 616-279-8021 or 616-540-1136</p> <p>Counties: Barry, Ionia, Kent, Mecosta, Montcalm, Muskegon, Newaygo, Oceana, and Ottawa</p>
Jackson District	<p>State Office Building, 4th Floor 301 East Louis Glick Highway Jackson, MI 49201-1535</p> <p>Contact: 517-513-9638, 517-416-5992 or 517-416-4631</p> <p>Counties: Hillsdale, Jackson, Lenawee, Monroe, and Washtenaw</p>

District	Contact Information
Kalamazoo District	<p>7953 Adobe Road, Kalamazoo, MI 49009-5026</p> <p>Contact: 269-243-0954 or 269-312-2535</p> <p>Counties: Allegan, Berrien, Branch, Calhoun, Cass, Kalamazoo, St. Joseph, and Van Buren</p>
Lansing District	<p>P.O. Box 30242 Lansing, MI 48909-7742</p> <p>Contact: 517-294-9288 or 517-275-0439</p> <p>Counties: Clinton, Eaton, Genesee, Gratiot, Ingham, Lapeer, Livingston, and Shiawassee</p>
Marquette District	<p>1504 West Washington Street Marquette, MI 49855-3118</p> <p>Contact: 906-241-0086 or 906-202-0013</p> <p>Counties: All counties in the Upper Peninsula</p>
Warren District	<p>27700 Donald Court, Warren, MI 48092-2793</p> <p>Contact: 586-412-6145 or 586-606-2572</p> <p>Counties: Macomb, Oakland, and St. Clair</p>

Initial Notification and Notification of Compliance Status NESHAP for Iron and Steel Foundry Area Sources

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

Please review the instructions before completing this form.

Please check whether the area source is a new or existing source (see instructions for definitions):

New Source (Date of startup: _____) Existing Source

Facility Information

Company Name: _____

Company Phone: _____

Mailing Address: _____

City: _____ State: _____ ZIP Code: _____

Owner/Operator Contact Name and Title: _____

Owner Phone: _____

Owner Mailing Address (if different than company): _____

City: _____ State: _____ ZIP Code: _____

Owner/Operator Email: _____

Facility Name (if different than company): _____

Facility Phone: _____

Facility Address (if different than company): _____

City: _____ State: _____ ZIP Code: _____

State Registration Number (SRN) if known: _____

Furnace Type and Capacity Information

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

Table 3. Furnace Type and Capacity

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 ($\leq 20,000$) Large Foundry ($> 20,000$)

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

Check one: Small Foundry ($\leq 10,000$) 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 40 CFR 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 40 CFR 63.10885(a)(2) of Subpart ZZZZZ.

Yes, the facility referenced above is operating in compliance with the no methanol requirement for the catalyst portion of each binder chemical formulation for a furfuryl alcohol warm box mold or core making line according to 40 CFR 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 40 CFR 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 40 CFR 63.10885(b)(2) of Subpart ZZZZZ and has prepared a plan for participation in a USEPA-approved program according to 40 CFR 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 40 CFR 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 40 CFR 63.10885(b)(4) of Subpart ZZZZZ.

Certification

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

Signature of "Responsible Official*"

Date

Name of "Responsible Official*": _____

Title of "Responsible Official*": _____

*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.

In accordance with the September 10, 2020, technology review, beginning on March 9, 2021, you must submit all subsequent compliance, notification and semiannual reports to the USEPA via the Compliance and Emissions Data Reporting Interface (CEDRI). You must also submit reports to the appropriate Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division district office (see Attachment A). Send the form to the attention of the "AQD District Supervisor."

People with disabilities may request this material in an alternate format by emailing EGLE-Accessibility@Michigan.gov or calling 800-662-9278.

EGLE does not discriminate on the basis of race, sex, religion, age, national origin, color, marital status, disability, political beliefs, height, weight, genetic information, or sexual orientation in the administration of any of its programs or activities, and prohibits intimidation and retaliation, as required by applicable laws and regulations.

This form and its contents are subject to the Freedom of Information Act and may be released to the public.