

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 for existing affected sources, the quantity of aluminum, copper, and other nonferrous metal melted in melting operations at the foundry in a given calendar year. For the purposes of this subpart, annual metal melt production is determined on the basis of the quantity of metal charged to the melting operations. The annual metal melt production does not include the melt production of ferrous metal melted in iron or steel foundry melting operations that are co-located with aluminum, copper, or other nonferrous melting operations or the nonferrous metal melted in non-foundry melting operations.

Annual metal melt capacity means for new affected sources, means the lower of the aluminum, copper, and other nonferrous metal melting operation capacity, assuming 8,760 operating hours per year or, if applicable, the maximum permitted aluminum, copper, and other nonferrous metal melting operation production rate for the melting operation calculated on an annual basis. Unless otherwise specified in the permit, permitted aluminum, copper, and other nonferrous metal melting operation rates that are not specified on an annual basis must be annualized assuming 24 hours per day, 365 days per year of operation. If the permit limits the operating hours of the melting operation(s) or foundry, then the permitted operating hours are used to annualize the maximum permitted aluminum, copper, and other nonferrous metal melt production rate. The annual metal melt capacity does not include the melt capacity for ferrous metal melted in iron or steel foundry melting operations that are co-located with aluminum, copper, or other nonferrous melting operations or the nonferrous metal melted in non-foundry melting operations.

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.

Large Foundry means, for an existing affected source, a copper or other nonferrous foundry with an annual metal melt production of copper, other nonferrous metals, and all associated alloys (excluding aluminum) of 6,000 tons or greater. For a new affected source, *large foundry* means a copper or other nonferrous foundry with an annual metal melt capacity of copper, other nonferrous metals, and all associated alloys (excluding aluminum) of 6,000 tons or greater.

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 Foundry means, for an existing affected source, a copper or other nonferrous foundry with an annual metal melt production of copper, other nonferrous metals, and all associated alloys (excluding aluminum) of less than 6,000 tons. For a new affected source, *small foundry* means a copper or other nonferrous foundry with an annual metal melt capacity of copper, other nonferrous metals, and all associated alloys (excluding aluminum) of less than 6,000 tons.

3. Completing the Format Sections of the Form.

Please complete company and owner information.

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

Chief of Source Registration
Air Management Services,
321 University Avenue,
Philadelphia PA 19104.

In addition, send a copy to the U.S. EPA Region III Office at the following address:

EPA Region III Director,
Air Protection Division,
1650 Arch Street,
Philadelphia, PA 19103

INITIAL NOTIFICATION

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS:
AREA SOURCE ALUMINUM, COPPER, AND OTHER NONFERROUS FOUNDRIES
40 CFR 63 SUBPART ZZZZZZ

FACILITY INFORMATION

Company name _____

Facility name (if different): _____

Facility (physical location) address: _____

Owner name/title: _____

Owner/company address: _____

Owner telephone number _____

Owner email address (if available): _____

Is the Operator the same person as the Owner? Yes No

If the Operator information is different from the Owner, please provide the following:

Operator name/title: _____

Operator telephone number: _____

Operator email address: _____

AM I SUBJECT OT SUBPART ZZZZZZ?

Yes, I am subject to 40 CFR Part 63 subpart ZZZZZZ National Emission Standards for Hazardous Air Pollutants: Area Source Aluminum, Copper, and Other Nonferrous Foundries Source category and NAICS code(s)

Compliance Date: Existing source: June 27, 2011 New source: _____
(Date of startup)

No, I am NOT subject to 40 CFR Part 63 subpart ZZZZZZ.

Reason not applicable:

- Major source of HAP emissions
- Annual production < 600 tons per year (TPY) based on year: _____
- None of the materials melted contain $\geq 0.1\%$ Cr, Ni, Pb, Be, Cd, or $\geq 1.0\%$ Mn¹
- Other: _____

If you checked the "No" box above, please complete only the section for "Am I Subject to Subpart ZZZZZZ" of this form and then proceed directly to the section for "Certification" of this form (skip section "Identification of Affected Operations").

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

¹ Chromium (Cr), nickel (Ni), lead (Pb), beryllium (Be), cadmium (Cd), and manganese (Mn).

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: _____

I am the: Owner Operator Certifying Official

Telephone Number: _____

Email _____

Address: _____

City, State, Zip: _____