



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

Regulation 12, Miscellaneous Standards of Performance, Rule 13:

Foundry and Forging Operations

Guidance to Prepare Regulation 12-13 Emissions Minimization Plan

Attention: Foundry and Forging Owners and Operators

Owners and Operators of Foundries and Forges subject to the requirements of Regulation 12, Miscellaneous Standards of Performance, Rule 13, Foundry and Forging Operations must develop and submit an Emissions Minimization Plan (EMP) by May 1, 2014 pursuant to Regulation 12, Rule 13 Section 401. Those owners and operators of facilities who conduct foundry and forging operations listed in Section 12-13-402 must detail all processes and procedures, equipment, management practices, abatement and control measures that are employed or are scheduled to be implemented to minimize fugitive emissions of odors and particulate matter at the facilities.

The purpose and scope of this document is to provide compliance assistance to facility owners and operators about the regulatory requirements of the EMP and to describe the comprehensive reporting framework and the District's pre-approved EMP template to be used in preparing the facility EMPs.

The owners and operators of these facilities should follow the EMP reporting framework below and must use the EMP template, which shall be available on the District's website and upon request. Please provide detailed descriptions of all sources of operations listed in Section 12-13-402 that involve metals that are not exempt under Section 12-13-103.1 from submission of an EMP; the facility process equipment, abatement and control equipment related to those operations; and the management practices, procedures and measures to reduce odorous and particulate emissions to a minimum. Note in the EMP the equipment, abatement devices, and processes that are subject to a National Emission Standards for Hazardous Air Pollutants (NESHAP).

1	Emissions Minimization Plan Title Page
2	Table of Contents and Certification by Responsible Manager (12-13-404.1)
	<i>Provide a Table of Contents and the Certification and Signature of a Responsible Manager. A Responsible Manager is an individual who responsible for the implementation and enforcement of the EMP.</i>
3	Designation of Confidential Business Information
	<i>Identify and describe the information you designate "CONFIDENTIAL," as trade secret or otherwise exempt under law from public disclosure. Specify the section(s) and corresponding page number(s).</i>
4	Company Description (i.e. Location, History of Company, Description of Manufactured Products)
5	Company Organizational Chart and Schedule of Management Operators (12-13-403.1.3)
	<i>a. Attach a copy of the organizational chart of the company, which describes the business structure and includes the name of the facility's Responsible Official. b. Provide the names and contact information of the Onsite Responsible Manager(s) and</i>

	<i>Onsite Alternate Contact(s) and their duty schedule.</i>
6	Contents of the EMP (12-13-403)
	a. <u>Operations Subject to EMP and Schedule of Operations.</u> List all operations that are in Section 12-13-402, which are conducted at the facility to reduce fugitive emissions of particulate matter and odorous substances (mold and core making operations, metal management, furnace operations, forging operations, casting and cooling operations, shake out operations, finishing operations, sand reclamation, dross and slag management). Provide the approximate schedule of operations such as by shift, day and range of hours.
	b. <u>Description of Operations.</u> Identify and describe all process equipment for each operation, the materials used in these operations, the abatement and control equipment, the monitoring conducted at the facility and the monitoring parameters. Include District Permit source numbers of all equipment, abatement or control devices, and processes subject 12-13-402. Specify the NESHAP section applicable to that equipment, abatement or control device and process.
	c. <u>Management Practices to Reduce Fugitive Emissions.</u> List and provide description of all preventative maintenance activities, work practice standards and other housekeeping measures at the facility to reduce fugitive emissions of particulates and odors. Provide schedules of activities conducted.
	d. <u>Description of Abatement and Control Equipment.</u> Facilities must provide a comprehensive list of all abatement and control equipment for operations subject to 12-13-402 and name the source(s) of operation in which it abates.
7	Technical Data (12-13-403.1)
	a. <u>Process Flow Diagram.</u> Provide a diagram that shows each facility operation required to be listed in Section 6a of the EMP, in the order of production commencing from material receipt to production of the final product. For each operation, specify the flow of all materials used or produced and all processes, abatement and controls to minimize emissions and identify all monitoring equipment. Identify abatement and control devices by District source numbers according to District Permit or as exempt from District Permit.
	b. <u>Facility Layout/ Floor Plan.</u> Indicate the relative locations of all processing equipment, abatement and control devices, monitoring equipment, and all permitted and exempt sources identified in the process flow diagram per Section 12-13-403.1.1 and any other source(s) that may contribute to emissions of particulates and odorous substances. Include all building walls, partitions, doors, windows, vents and openings and indicate all areas that have abatement for particulates and odorous emissions. Identify all metal melting and processing equipment by the facility's District Permit source number or as exempt from District permit requirements.
8	Fugitive Emissions Reductions Previously Realized (12-13-403.2)
	<i>Provide a description of the equipment, processes and procedures installed or implemented within the last five years to reduce fugitive emissions. Include the purpose for implementation and detail any employee training that was conducted for that equipment, process or procedure and the frequency of any ongoing training.</i>
9	Schedule for the Implementation of the EMP Elements (12-13-403.3)
	a. Provide a list of existing or current EMP elements in place pursuant to and under a District Authority to Construct as of the initial date of EMP submittal (on or before May 1, 2014). Include a description, the purpose and schedule of the element(s).
	b. Provide a list of new or future EMP elements to be implemented following APCO approval of the EMP. Include a description, the purpose and schedule of the element(s) to be implemented.

10	Compliance Schedule for the EMP
	a. <u>Determination of Completeness</u> – Provide a list of all EMP revisions submitted to the District for completeness determination. Include the, description of the revision and corresponding page number(s) and section(s) of the EMP where the revision can be located.
	b. <u>APCO Recommendations to EMP and Determination of Approvability</u> – Acknowledge acceptance or rejection of each of the APCO's recommendations. For each of the accepted recommendations, describe the measures to be implemented and include the date of proposed implementation. If the facility rejects a recommendation, provide a detailed basis for that rejection.
11	Appendix
	List all items to be included in the Appendix. Identify the Appendix # and provide the Page # and Section # of the EMP where the information references.

The Responsible Manager shall certify in writing that the EMP is complete and accurate as of the date it is submitted to the District (Section 12-13-404.1). To be complete, the Plan must include all information required for each element of the EMP. Section 12-13-403 lists all of the required elements and information of an EMP.

The facility owner or operator must designate in the EMP all information as "CONFIDENTIAL" that it claims is trade secret or otherwise exempt under law from public disclosure. EMP must have all information. If the EMP includes any information marked "CONFIDENTIAL," the facility owner or operator must submit simultaneously a copy of the EMP marked "PUBLIC COPY" with the designated information redacted.

The Responsible Manager shall submit all EMP reports and changes to:

Bay Area Air Quality Management District
Compliance & Enforcement Division
Attn: Tracy Lee
939 Ellis St. San Francisco, CA 94109

For any questions about this EMP guidance document and to receive an electronic copy of the EMP template, please contact Tracy Lee, Air Quality Specialist II at tracylee@baaqmd.gov or (415)749-4979.