



# Compliance Advisory

June 17, 2013

## Foundry and Forging Operations

*This Advisory is provided to inform you about activities of the Air District which may affect your operation. It is intended to assist you in your effort to achieve and maintain compliance with applicable air pollution regulations.*

**ATTENTION: FOUNDRY AND FORGING OPERATORS**

**SUBJECT: ENFORCEMENT ADVISORY – OPERATION AND MAINTENANCE PLAN REQUIREMENTS**

On May 1, 2013, the Bay Area Air Quality Management District adopted Regulation 12, Rule 13, Miscellaneous Standards of Performance for Foundry and Forging Operations. Foundries and Forging Operations subject to Section 12-13-301 (Requirement to Comply with an Emissions Minimization Plan), are required to comply with the following reporting requirements in Section 400 by **July 30, 2013**:

- **12-13-408.1 requires facilities to submit a list of the operations, processes, and equipment used to comply with the following provisions of any federal NESHAP to which it is subject:**
  - 40 CFR Part 63, Subpart RRR: NESHAP for Secondary Aluminum Production, Section 63.1506(c)(1) through (c)(3) Capture/collection systems design, installation, and operation;
  - 40 CFR Part 63, Subpart EEEEE: NESHAP for Major Source Iron and Steel Foundries, Section 63.7690(b)(1);
  - 40 CFR Part 63, Subpart YYYYY: NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities, Section 63.10686;
  - 40 CFR Part 63, Subpart ZZZZ: NESHAP for Iron and Steel Foundries Area Sources, Section 63.10895(b);
  - District Regulation 11: Hazardous Air Pollutants, Rule 15: Airborne Toxic Control Measure for Emissions of Metals from Non-Ferrous Metal Melting, Section 11-15 (b)(1) and (b)(3).
  
- **12-13-408.2 requires facilities to submit a copy of the written Operation and Maintenance Plan or the Operation, Maintenance, and Monitoring Plan that was required by the US EPA Administrator pursuant to the following provisions set forth in any federal NESHAP to which it is subject:**
  - 40 CFR Part 63, Subpart RRR: NESHAP for Secondary Aluminum Production, Section 63.1510(b);
  - 40 CFR Part 63, Subpart EEEEE: NESHAP for Major Source Iron and Steel Foundries, Section 63.7710(b);
  - 40 CFR Part 63, Subpart YYYYY: NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities, Section 63.10685(a) and (b);
  - 40 CFR Part 63, Subpart ZZZZ: NESHAP for Iron and Steel Foundries Area Sources, Section 63.10896;
  - 40 CFR Part 63, Subpart ZZZZZ: NESHAP: Area Source Standards for Aluminum, Copper, and Other Nonferrous Foundries, Section 63.11550(a)(3).

This report should be submitted to:

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

**If you have any further needs, please call the District at the following numbers:**

- ☎ For questions about this advisory contact:
  - Tracy Lee, Senior Air Quality Inspector at [tracylee@baaqmd.gov](mailto:tracylee@baaqmd.gov) or (415) 749-4979
- ☎ For a copy of the above listed rule, see <http://www.baaqmd.gov/Divisions/Planning-and-Research/Rules-and-Regulations.aspx>
- ☎ For compliance assistance, call (415) 749-4999, the Compliance Counselor Hotline.

**Wayne Kino**  
**Director of Compliance and Enforcement**