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 EEEEEE: NESHAP for Major Source Iron and Steel Foundries, Section 63.7690(b)(1);
  - 40 CFR Part 63, Subpart YYYY: NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities, Section 63.10686;
  - 40 CFR Part 63, Subpart ZZZZZ: 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 EEEEEE: NESHAP for Major Source Iron and Steel Foundries, Section 63.7710(b);
  - 40 CFR Part 63, Subpart YYYY: NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities, Section 63.10685(a) and (b);
  - 40 CFR Part 63, Subpart ZZZZZ: NESHAP for Iron and Steel Foundries Area Sources, Section 63.10896;
  - 40 CFR Part 63, Subpart ZZZZZZ: 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 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