

Top 10 Overlooked Foundry MACT Requirements



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- 1. Review the written certification prepared in 2005 stating that the foundry purchases and uses only metal ingots, pig iron, slitter, or other materials that do not include post-consumer automotive body scrap, post-consumer engine blocks, post-consumer oil filters, oily turnings, lead components, mercury switches, plastics, or free organic liquids. (63.7700(b))** Some of the work practice standards established in 2005 are not required to be routinely updated and so they are often overlooked. A periodic review of the standards is recommended.
- 2. Ensuring that you have updated copies of your scrap suppliers' procedures for removing mercury switches. (§63.7700 (c)(2) and 63.7744(a))** This was completed when the original materials acquisition plan was developed in 2005 but many foundries have not updated their plans.

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- 3. Updating the Site-Specific Monitoring Plan for each bag leak detection system.** (§63.7710 (b)(4)) As baghouses are replaced or added, the Site-Specific Monitoring Plans are often overlooked and are not updated to accurately reflect current site conditions.
- 4. Completing semi-annual VE notations to demonstrate compliance with the opacity limits.** (§63.7690(a)(7) and 63.7731(b)) This requirement has been overlooked during personnel changes if the foundry has not developed a compliance calendar listing all the requirements.

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- 5. Updating the facility's Operations & Monitoring Plan, as necessary.** (§63.7710(b) and 63.7745(b)) This plan should be updated as operating and control equipment are replaced or modified.
- 6. Ensuring a minimum sample of 60 scf for PM/Metals testing of melt and pouring processes.** (§63.7732(b)(2)) One hour tests are not sufficient to obtain this volume of sample. (This is also a requirement for testing under 40 CFR 60 Subpart UUU for thermal reclaim units).
- 7. Updating mold vent study when there are significant changes to sand-to-metal ratios, binder formulations, and coating materials.** (§63.7710(b)(6)).

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- 8. Submitting Testing Protocol 60 days before scheduled source tests.** (§63.7750(d)). Title V permits and IDEM rules require protocol to be submitted 35 days in advance of testing.
 - How to handle semi-annual fugitive visual observations.
- 9. Deadline for Submitting Performance Test Results.** (§63.7750(e)(2)). Performance test results are due within 60 days of the test. Title V permits general language requires test reports within 45 days of the test.
- 10. Recordkeeping Requirements** (§63.7752(a)(4)). Annual records of quantities of chemical binders and coating materials used in making both molds and cores, as well as records of the amount of HAPs used (but not necessarily emitted).