



IOWA DEPARTMENT OF NATURAL RESOURCES

Air Quality News

Environmental Services

Air Toxics Update: Iron and Steel Foundries

EPA recently updated several federal regulations for hazardous air pollutants (also known as HAP or air toxics). EPA's actions address the Risk and Technology Review (RTR) required under the U.S. Clean Air Act.

This is the tenth in a series of articles covering EPA's updates to air toxics regulations (also known as National Emission Standards for Hazardous Air Pollutants or NESHAP). The changes update individual subparts of 40 Code of Federal Regulations (CFR) Part 63. Find background on the NESHAP RTR requirements and a general overview of the recent changes in the [Air Toxics Update](#). In the following weeks, Iowa DNR will continue to address changes to specific regulations affecting Iowa businesses.

Updates to the Standards for Iron and Steel Foundries

On September 10, 2020, EPA published the final [NESHAP RTR Amendments](#) for Iron and Steel Foundries (**Subpart EEEEE**). Facilities in this source category manufacture castings by melting metal in a furnace and then pouring the molten metal into a mold of a desired shape. Molded products are used in car engines, construction and machinery, among other uses. The NESHAP requirements are intended to reduce HAP emissions from metals and organic compounds. Iowa DNR estimates that four facilities are currently subject to the NESHAP for Iron and Steel Foundries.

New Requirements

The changes to the standards include, but are not limited to, the following:

- **RTR Assessment:** Following the RTR, EPA determined that risks from the source category are acceptable and that no new cost-effective controls are available. EPA did not change any standards as a result of the RTR.
- **Startup, Shutdown, and Malfunction:** The amendments revise and clarify regulatory provisions related to emissions during periods of SSM to indicate that the standards apply continuously, including periods of SSM. However, EPA recognized that it is technically infeasible for major sources to meet the emissions limit for volatile organic air toxics during some periods. During these periods, major sources must adhere to work practice standards to reduce HAP emissions.
- **Electronic Reporting:** The updated standards also include electronic reporting of compliance reports and performance test results and reports using CEDRI.
(**Note:** Affected facilities must also comply with Iowa requirements for submitting reports, as specified in Iowa administrative rules or in air permits.)

Compliance Deadlines

For all affected sources, the compliance date for most of the SSM revisions was September 10, 2020. However, because EPA required new work practice standards to address volatile organic air toxics during SSM, the compliance date for these new requirements is March 9, 2021. The compliance date for all affected sources for the electronic reporting requirements is also March 9, 2021.

For more information: [Iron and Steel Foundries](#)

Implementation in Iowa

DNR plans to begin rulemaking to incorporate the updated standards—which will give DNR authority to administer the rules. In the interim, EPA will implement the NESHAP RTR changes. DNR is available to answer questions about the new amendments and will work with EPA Region 7 to assist facilities.

DNR staff will review the changes and contact facilities which we know are impacted and have substantively different requirements in their permits from the updated NESHAP. However, an affected facility should carefully review the updated NESHAP to be aware of any new requirements and compliance dates. An affected facility must still comply with the NESHAP RTR requirements even if the requirements are not included in an Iowa air permit.

If you have technical questions about the NESHAP changes, please contact Michael Hermesen (email: michael.hermesen@dnr.iowa.gov; phone: 515-725-9577). For general questions, please contact Christine Paulson (email: christine.paulson@dnr.iowa.gov; phone: 515-725-9510).

A note on Iowa DNR and COVID-19

The Iowa Department of Natural Resources is working with state and local officials to reduce the spread of COVID-19 and has transitioned employees to work remotely. DNR offices are closed to the public during this time and only available by appointment.

In another effort to further reduce the spread of COVID-19, the DNR is encouraging the use of the online services for submitting applications, payments and other daily tasks and interaction with DNR staff.

- [Full list of DNR's online services](#)
- [Up-to-date information on DNR services, facilities and events impacted by COVID-19](#)
- [Technical information for regulated businesses in regards to COVID-19](#)

We thank you for your patience and flexibility during this time. If you need to contact DNR staff you can reach them by email or phone or by calling 515-725-8200

DNR's Air Quality News listserve is targeted to the regulated public and consultants to deliver timely regulatory news, program updates, and technical guidance to your email. If you have difficulty, please contact DNR's Wendy Walker at 515-725-9570.