

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 Forge Owners and Operators

SUBJECT: Enforcement Advisory – Recordkeeping Requirements




On May 1, 2013, the Bay Area Air Quality Management District adopted Regulation 12, Miscellaneous Standards of Performance, Rule 13, Foundry and Forging Operations. **As of May 1, 2013**, foundry and forge operations must maintain records as required in Section 501 to demonstrate compliance with the Emissions Minimization Plan (EMP) requirements or exemption from the EMP requirements.

NOTE: Facilities that process greater than 2,500 tons of metal per rolling 12 month period will also be required to submit an EMP by May 1, 2014.

If you own or operate a foundry or forge that:	RECORDKEEPING REQUIREMENTS Section 12-13-501 (Effective May 1, 2013)	Requirement to submit an EMP Section 12-13-401 (Due May 1, 2014)
<i>Processes less than 1 ton per rolling 12 month period</i>	NONE	NO
<p><i>Processes 1 – 2,500 tons of metal per rolling 12 month period</i></p> <p style="text-align: center;"><i>or</i></p> <p><i>Melts ONLY clean metal or alloy</i></p>	<ul style="list-style-type: none"> • Maintain records that demonstrate eligibility for clean metal or alloy purity exemption (12-13-103.1). Demonstration may be by: <ul style="list-style-type: none"> ○ Certification from the materials supplier demonstrating that the chemical composition of the aluminum or other metal or alloy (other than lead, solder, or zinc scrap) includes no more than 0.004 percent of cadmium and no more than 0.002 percent of arsenic; ○ Demonstration of the chemical composition of the aluminum or other metal or alloy as determined in accordance with Section 12-13-601; ○ A method approved by the APCO. • Maintain records to demonstrate small facility exemption (12-13-103.2) for those facilities that melt or heat treat 2500 tons of metal or less per rolling 12 month period. <p>Records to demonstrate an exemption under 12-13-103 must be maintained for a minimum of 5 years and be made available to the APCO or the APCO’s designee upon request.</p>	NO

<p>Processes greater than 2,500 tons of metal per rolling 12 month period</p>	<ul style="list-style-type: none">• Maintain ALL records that are necessary to determine compliance with the facility's EMP (12-13-301), which may include, but are not limited to:<ul style="list-style-type: none">○ The monthly throughput of ferrous and non-ferrous metal processed, including metal melted, heated, scrapped, or recycled;○ The basis for each metal's rolling 12 month throughput determination;○ The monthly throughput of each type of binder used;○ The monthly throughput of sand used and the amount in pounds of sand used <p>These records must be maintained for a minimum of 5 years and made available to the APCO or the APCO's designee upon request.</p>	<p style="text-align: center;">YES</p> <p style="text-align: center;">District will provide an EMP guidance document with reporting format and instructions</p>
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If you need further assistance, please call the District at the following numbers:

-  For questions about this advisory contact Tracy Lee, Air Quality Specialist 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