



## **Advocacy Alert: Favorable Outcome on Iron and Steel Foundry Emission Standard**

### **THE ISSUE**

A court ruling required EPA to issue a National Emission Standard for Hazardous Air Pollutants (NESHAP) for major iron and steel foundry sources by June 30, 2020. Concurrently, EPA agreed to conduct a technology review for area sources. This issue had enormous implications for large foundries, which already commit tremendous resources toward environmental protection.

### **AFS ADVOCACY**

The AFS Air Quality Committee and The Policy Group worked with EPA over four years to identify the iron and steel foundries subject to this rule, provide EPA with emissions data and other information about foundry operations, and correct the data that EPA provided for review. This included meetings with officials in Research Triangle Park, NC and several conference calls.

In October 2019, EPA issued a proposed rule with no new emission limits. AFS submitted comments that primarily supported EPA's proposal, but identified needed clarifications regarding emissions data, cost estimates for control technology, work practices during periods of startup, shutdown and malfunction (SSM), and compliance dates. EPA requested more information, which AFS supplied, helping EPA officials better understand SSM processes for cupolas.

### **THE POSITIVE OUTCOME**

The final rule announced June 26, 2020, imposes no new emissions limits on iron and steel foundries. EPA concluded that the existing foundry maximum achievable control technology provides an ample margin of safety to protect public health; that more stringent standards are not needed; and that there are no new developments that would necessitate revising the control technology rules. AFS salutes the Air Quality Committee for its work on this issue and thanks AFS Corporate Members, whose steadfast support makes AFS advocacy work possible.