Potential Boiler MACT Subpart DDDDD Requirements for Foundries Rev. 6/05/13 Prepared by Bryant Esch, Member, AFS Air Quality Committee

Promulgated on March 21, 2011 and finalized January 31, 2013, U.S. EPA's Boiler MACT (Part 63) details requirements for operators of boilers and process heaters. While the rule has gone through several proposed variations, stays and deadline extensions, the January 2013 final rule provides some certainty for facilities regarding applicable requirements for their equipment. Therefore, for foundry facilities with applicable natural gas fired boilers or process heaters (e.g. large water heaters or indirect fired core ovens), the following requirements currently apply:

Required Activities for Boiler MACT (not Area Source) Eligible Units

- NOTIFICATION OF APPLICABILITY EPA and the applicable state regulator were to be sent an initial notice of applicability by May 31, 2013. (Note: Any notifications sent earlier to satisfy a recent prior version of the rule will also satisfy the new notification deadline.)
- TUNE-UP Non-exempt equipment of 10 mmbtu/hr or greater must undergo a tune-up annually. Equipment less than 10 mmbtu/hr must have a tune-up conducted every two years. Equipment rated at 5 mmbtu/hr or less must have tune-up conducted every five years.

The tune up requirements are expansive and specific (provided in 63.7540(a)(10)(i) through 63.7540(a)(10)(vi) of the rule). Boilers and process heaters at major sources have an initial tune-up deadline of January 31, 2016.

- ENERGY ASSESSMENT A one-time energy assessment must be conducted by a
 qualified energy assessor for equipment covered under the rule. The requirements of
 this assessment are outlined in Table 3 of the rule. Boilers and process heaters at
 major sources are required to conduct an energy assessment by January 31, 2016.
- NOTIFICATION OF COMPLIANCE EPA and the applicable state regulator must be sent a notification of compliance by January 31, 2016. The notification of compliance must include affirmations that tune-ups and energy assessments have been completed. Therefore, these work practices must be implemented and documented prior to the January 31, 2016 deadline.