The electric arc furnace (EAF) means any furnace that produces molten steel and heats the metal to the proper temperature to allow it to be formed into the desired shape. The SIC manual separately lists other forging operations under SIC 3462, which is "Forgings, iron and steel: made in steel works or rolling mills." Clearly, the intent of this language is to include forging operations in steel mills. In the Standard Industrial Code (SIC) manual, listed under SIC 3312 is "Forgings, iron and steel: made in steel works or rolling mills." Teeming, as defined in this way, is found in the forging plant you are looking into.

This indicates that the plants with EAFs that incorporate teeming operations would be covered if they are considered to be steel mills. Teeming, as defined in the SIC manual, is the process of pouring molten steel into ingot molds, after which the ingots are removed from the molds, forged to customer's specifications, then shipped out. Clearly, this process doesn't fit into the foundry category, since the EAFs do not cast the steel into the shape of finished product, but rather into intermediate products; steel plant EAFs cast molten steel into the shape of finished products, such as in a foundry, are not affected by these standards.

The Electric Arc Furnace Act exempts these sources. However, the history of these Subparts needs to be investigated further. As you state in your memorandum, there is no language in either Subpart that specifically states that EAFs are not steel mills. As quoted in your email, George Czerniak, Chief, Air Enforcement and Compliance Assurance Branch, states:

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