Under Subpart AA and Subpart AAa, how is electric arc furnace (EAF) defined?

The definition of EAF no longer includes the wording that exempts furnaces from which the molten steel is cast into the shape of finished products, such as in a foundry; however, it is not the intent of the regulation to now apply to EAF's in all foundries. The exemption continues for foundries that cast into finished products. The affected facility is any EAF that produces molten carbon, alloy, or specialty steel and heats the charge materials with electric arcs from carbon electrodes, whether the EAF is in a steel plant or in a "foundry." Foundry EAF's cast molten iron or steel into the shape of FINISHED products; steel plant EAF's cast molten steel into the shape of INTERMEDIATE products.

Some companies perform both foundry and steel mill operations at the same plant, therefore, the title of the company may not be descriptive of the function of the furnace. In determining the applicability of Subparts AA and AAas, you must consider the intended function of the furnace to determine whether it is a foundry or steel plant EAF. Foundry EAF's cast molten iron or steel into the shape of finished products; steel plant EAF's cast molten steel into the shape of intermediate products.

In response to your request, we have begun to develop a definition of "steel plant" that will be included in Subparts AA and AAs. We will of course send you a copy of the draft definition for your review prior to proposal. Hopefully, the addition of the steel plant definition will eliminate the confusion and misunderstanding of the intent of the regulations concerning foundry EAF's.

We hope this response has clarified your understanding of the intent of this regulation. Please do not hesitate to contact Ms. Laura S. Butler (telephone FTS 629-5624) of my staff if you have additional comments or questions.