



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: NS01

Category: NSPS
EPA Office: ESED
Date: 11/12/1985
Title: NSPS Applicability - Electronic Arc Furnace Vessels
Recipient: Kee, David
Author: Farmer, Jack R.

Subparts: Part 60, AA, Steel Plants-Electric Arc Furnaces
Part 60, AAa, Steel Plants-EAFs, Argon-Oxygen Decarb. Vess. (PT 8/17/83)

References: 60.270
60.270a

Abstract:

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.

Letter:

Control Number: NS01

November 12, 1985

MEMORANDUM

SUBJECT: Applicability of 40 CFR Part 60, Subparts AA and AAa

FROM: Jack R. Farmer, Director
Emission Standards and Engineering Division (MD-13)

TO: David Kee, Director
Air Management Division (5AR-26)
Region V

This memo is written in response to your memo of October 18, 1985, in which you requested assistance in your understanding of the applicability of Subpart AA and AAa promulgated October 31, 1984. Subpart AA is applicable to electric arc furnace (EAF) vessels constructed after October 21, 1974, and on and before August 17, 1983. Subpart AAa is applicable to EAF and argon oxygen decarburization (AOD) vessels constructed after August 17, 1983.

You are correct that the definition of EAF no longer includes the wording that exempts furnaces from which 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 wording was deleted because it created the impression that any EAF located in a "foundry" would not be regulated by this NSPS. 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."

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 AAa, 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 AAa. 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.