

STAPPA / ALAPCO

STATE AND TERRITORIAL
AIR POLLUTION PROGRAM
ADMINISTRATORS

ASSOCIATION OF
LOCAL AIR POLLUTION
CONTROL OFFICIALS

February 20, 2003

S. WILLIAM BECKER
EXECUTIVE DIRECTOR

Attention: Docket ID No. OAR-2002-0034
Iron and Steel Foundries NESHAP Docket
EPA Docket Center (Air Docket)
U.S. EPA West (MD-6102T)
U.S. Environmental Protection Agency
Room B-108
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Dear Sir or Madam:

On behalf of the State and Territorial Air Pollution Program Administrators (STAPPA) and the Association of Local Air Pollution Control Officials (ALAPCO), thank you for this opportunity to comment on the proposed National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries, which were published in the *Federal Register* on December 23, 2002 (67 *Federal Register* 78274). We are specifically commenting on the fact that the proposal fails to address mercury emissions.

Releases of mercury into the air are of great concern to state and local air pollution control agencies, especially because these emissions are deposited into water bodies, where they bioaccumulate in the food chain. This is a widespread problem in the United States – a total of 44 states have issued fish consumption advisories for mercury. Thirteen of those states have issued statewide advisories for freshwater water bodies and nine have statewide advisories for coastal waters.

There are significant health concerns associated with mercury exposure. Since fetuses are extremely sensitive to the effects of mercury, women of child-bearing age are the population of greatest concern. Children whose mothers were exposed to relatively high levels of methylmercury during pregnancy have exhibited a variety of abnormalities, including delayed walking and talking, and reduced neurological test scores. Additionally, even children exposed to far lower methylmercury exposures in the womb have shown signs of delays and deficits in learning ability. In addition to human health concerns, mercury exposures are dangerous to wildlife.

Because of the significant health threat that exposure to mercury poses and the critical importance of federal action to limit releases of this contaminant into the

environment, we were extremely disappointed that the proposed Maximum Achievable Control Technology (MACT) standard for iron and steel foundries did not address mercury emissions. This is especially problematic because iron and steel foundries are a significant source of mercury emissions into the air.

Several states have compiled data that illustrate the significant contribution of mercury emissions into the air from iron and steel foundries. New Jersey stack test data estimate that six iron and steel foundries in the state could be emitting up to 935 pounds of mercury into the air per year, representing the largest-emitting source category of mercury in the state. In Ohio, stack tests on one source alone indicated that the facility emitted as much as 600 pounds of mercury annually.

In light of the critical importance of reducing mercury in the environment, and considering the fact that iron and steel foundries emit substantial quantities of mercury into the air, we strongly recommend that EPA include effective controls on mercury emissions in the final MACT standard. Since much of the mercury is introduced into the foundries from scrap metal, notably auto bodies with mercury switches, it is critical to address these and similar sources of mercury in the feedstock. Accordingly, EPA should implement work practice standards for mercury that would significantly curtail the amount of mercury entering the foundries (e.g., source separation measures). Additional controls beyond the work practice standards should be required as needed as well.

Thank you again for this opportunity to comment on the proposed rule.

Sincerely,



Lloyd Eagan
Chair
STAPPA Air Toxics Committee



Robert Colby
Chair
ALAPCO Air Toxics Committee