COLUMBIA STEEL CASTING CO.
Pollution Prevention Scrap Management Program

Required for Iron and Steel Foundries Subject to the
National Emission Standards for Hazardous Air Pollutants 2008 Area Source Rule
Revised February 2010

Background

Contaminants such as chlorinated plastics, free organic liquids, lead and mercury are not appropriate or desired for the production of castings in iron and steel foundries. However, these contaminants may be found mixed in with the scrap metal that is the basic feedstock for many iron and steel foundries.

EPA has identified iron and steel foundry facilities as potential sources of HAP emissions and, on January 2, 2008, promulgated final regulations (codified at 40 CFR Part 63, Subpart ZZZZZ) intended to control or minimize such emissions. The regulations require iron and steel foundry facilities, among other things, to restrict the use of certain scrap or follow a Pollution Prevention Scrap Management Program for scrap purchased as production feedstock to minimize the amount of specified contaminants in such scrap.

General Information

COLUMBIA STEEL CASTING CO. is committed to complying with the requirements of the Iron and Steel Foundry Area Source Rule and to the goal of minimizing to the extent practicable the presence of these contaminants in scrap that may result in the emission of hazardous air pollutants (HAP). Accordingly, COLUMBIA STEEL CASTING CO. has adopted and will comply with the provisions of this Scrap Management Program designed to control the presence of such contaminants in scrap that is consumed in our operations by managing each segregated metallic scrap storage area, bin or pile prior to charge make-up in compliance with requirements associated with Restricted Metallic Scrap and/or General Iron and Steel Scrap.

The terms used in this document shall have the same definitions as those enumerated in EPA's Final Area Source Rule found at 40 CFR Part 63 Subpart ZZZZZ. Material specifications will be kept onsite and readily available to all personnel with material acquisition duties, and a copy will be furnished to each of our scrap providers. As outlined in the final rule, the term "mercury switch" denotes only mercury switches that are part of a convenience light switch mechanism installed in a vehicle.

Material Specification for Restricted Metallic Scrap

The below specification will be provided in advance, attached to, or written on the purchase order or agreement for the following Restricted Metallic Scrap. That scrap will be segregated from other scrap that does not meet these specifications prior to charge make-up:

- Metal ingots
- Pig iron
- Slitter
- Other materials that do not include post-consumer automotive body scrap, post-consumer engine blocks, post-consumer oil filters, oily turnings, lead components, chlorinated plastics, or free liquids.

Note: Restricted metallic scrap that is commingled prior to delivery at COLUMBIA STEEL CASTING CO. with scrap not meeting the above definition will be rejected and returned to the vendor at the vendor's expense and risk.

Restricted Metallic Scrap Specification

The metallic scrap provided pursuant to this agreement shall not include post-consumer automotive body scrap, post-consumer engine blocks, post-consumer oil filters, oily turnings, lead components, chlorinated plastics, or free liquids (free liquids is material that fails the paint filter test by EPA Method 9095B, "Paint Filter Liquids Test" (revision 2), November 2004). Free liquids do not include liquids that the supplier can demonstrate is water resulting from exposure to rain.

Scrap specifications for many industries are published by the Institute of Scrap Recycling Industries, Inc. (ISRI) in their Scrap Specifications Circular. Section FS-2008 is Guidelines for Ferrous Scrap. Within those guidelines, COLUMBIA STEEL CASTING CO. will accept for purchase only scrap meeting Codes 200, 201, 234, 236. Any other scrap not meeting those codes must be pre-approved by CSCC's purchasing manager, and will be approved only if it meets the above Restricted Metallic Scrap Specification.

CSCC may also use internally generated scrap from our own casting and machining processes, and clean cast machinery wear liners of known composition. Other internally generated scrap from maintenance and construction activities will not be used.