

Frequently Asked Questions

What is a NESHAP?

A National Emission Standard for Hazardous Air Pollutants, or NESHAP, is a federal regulation that targets air emissions of hazardous air pollutants (HAP).

What is an area source?

An area source is any facility can emit to the air less than 10 tons per year of any single HAP and less than 25 tons per year of all HAP.

What chemicals are HAPs?

The Clean Air Act contains a list of 188 chemicals that are officially classified as HAP. The HAP metals regulated by this rule include compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form, with the exception of lead. The rule **only** applies to operations which use or emit these metals.

The Nine Metal Fabrication and Finishing Source Categories NESHAP was published in the **Federal Register** on July 23, 2008 (73 FR 42978). The **Federal Register** notice is available at <http://www.epa.gov/ttn/atw/area/arearules.html>.

You can also contact your Regional EPA AIR TOXICS office at the following numbers:

| Address | States | Website / Phone Number |
|---|--------------------------------------|---|
| Region 1 1 Congress Street, Suite 1100 Boston, MA 02114-2023 | CT, MA, ME, NH, RI, VT | www.epa.gov/region1 888-372-7341 617-918-1650 |
| Region 2 290 Broadway NY, NY 10007-1866 | NJ, NY, PR | www.epa.gov/region2 212-637-4023 |
| Region 3 1650 Arch Street Philadelphia, PA 19103-2029 | DE, MD, PA, VA, WV, DC | www.epa.gov/region3 800-228-8711 215-814-2196 |
| Region 4 Atlanta Federal Center 61 Forsyth Street, SW Atlanta, GA 30303-8960 | FL, NC, SC, KY, TN, GA, AL, MS | www.epa.gov/region4 800-241-1754 404-562-9131 |
| Region 5 77 West Jackson Blvd. Chicago, IL 60604-3507 | IL, IN MI, WI MN, OH | www.epa.gov/region5 312-886-6812 312-353-6684 312-886-6798 |
| Region 6 1445 Ross Avenue Suite 1200 Dallas, TX 75202-2733 | AR, LA, NM, OK, TX | www.epa.gov/region6 800-887-6063* 214-665-7250 214-665-7224 |
| Region 7 901 North Fifth Street Kansas City, KS 66101 | IA, KS, MO, NE | www.epa.gov/region7 800-223-0425 913-551-7003 |
| Region 8 1595 Wynkoop Street Denver, CO 80202-1129 | CO, MT, ND, SD, UT, WY | www.epa.gov/region8 800-227-8917* 303-312-6460 |
| Region 9 75 Hawthorne Street San Francisco, CA 94105 | CA, AZ, HI, NV, GU, AS, MP | www.epa.gov/region9 415-947-8715 |
| Region 10 1200 6th Avenue Suite 900, AWT-107 Seattle, WA 98101 | AK, ID, WA, OR | www.epa.gov/region10 800-424-4372* 206-553-6220 |

* For sources within the region only.

For More Information

This brochure is a general guide only; review the rule for your specific requirements at:
<http://www.epa.gov/ttn/atw/area/arearules.html>
 For more information on state requirements, please contact your state representatives at:
http://www.epa.gov/ttn/atw/area/table_state_contacts.doc or,
<http://www.4cleanair.org/contactUsaLevel.asp>

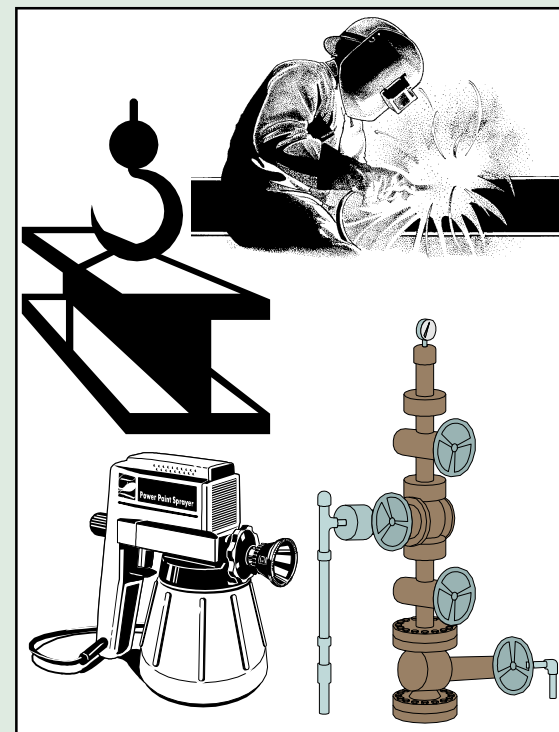


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<http://www.epa.gov/ttn/atw/area/arearules.html>

Office of Air Quality Planning and Standards

Summary of Regulations Controlling Air Emissions for Nine Metal Fabrication and Finishing Source Categories



National Emission Standards for Hazardous Air Pollutants (NESHAP)

SUBPART XXXXXX

Nine Metal Fabrication and Finishing Source Categories Area Source NESHAP.

On **July 23, 2008**, EPA finalized a regulation that affects emissions of several metals from facilities that are area sources in nine metal fabrication and finishing source categories. This brochure is intended to provide basic information for metal fabrication and finishing facilities that may be subject to this rule.

Which source categories are affected?

The rule applies **ONLY** to area sources where the primary activity of the facility is in one of the following nine source categories:

- (1) Electrical and Electronic Equipment Finishing Operations, including motor and generator manufacture; and electrical machinery, equipment, and supplies not elsewhere classified (NEC);
- (2) Fabricated Metal Products NEC;
- (3) Fabricated Plate Work (Boiler Shops);
- (4) Fabricated Structural Metal Manufacturing;
- (5) Heating Equipment, except Electric;
- (6) Industrial Machinery and Equipment Finishing Operations, including construction machinery manufacturing; oil and gas field machinery manufacturing; and pumps and pumping equipment manufacturing;
- (7) Iron and Steel Forging;
- (8) Primary Metal Products Manufacturing; and
- (9) Valves and Pipe Fittings NEC.

Many facilities perform the metal fabrication and finishing processes addressed by this rule, but are not subject to Subpart XXXXXX unless they are "primarily engaged" in operations which are classified in one of the above-listed nine source categories. A more detailed description of the affected source categories is included in the text of the rule, published in the Federal Register on July 23, 2008 (73 FR 42978). To check if you are subject, crosscheck your SIC/NAICS codes with the SIC/NAICS codes that are subject to this rule and listed at this web link: <http://www.epa.gov/ttn/atw/area/met-fab-6x-applicability.xls>. Note that your facility may be subject to this rule and required to submit an initial notification even if it does not currently perform any of the regulated processes described below.

Five industrial processes are regulated:

Dry Abrasive Blasting: Most dry abrasive blasting operations must be enclosed, with a filtration control device. Large objects (> 8 feet) may be blasted without control devices. Small "glove box" operations have lesser requirements. Monitoring may be required under some circumstances. See the rule to find out what these circumstances are.

Dry Grinding and Dry Polishing with Machines: Emissions must be captured and vented to a filtration control device, and dust in the surrounding areas must be minimized, as practicable.

Dry Machining: Dust in the surrounding areas must be minimized, as practicable.

Spray Painting: Spray paint must be applied with high volume low pressure (HVLP) spray guns (or equivalent), workers must be properly trained, and spray guns must be cleaned properly. Most spray painting of objects \leq 15 feet must be performed in a booth with filters to capture metal particulates. *Note:* Spray painting operations painting objects > 15 feet, or spray painting any objects in the Fabricated Structural Metal source category are not required to comply with the paint booth and filter requirement.

Welding: Welding operations must implement one or more of the following management practices to minimize emissions, as practicable, and in accordance with sound welding engineering principles while maintaining weld quality: (i) Use welding processes with reduced fume generation capabilities; (ii) Use welding process variations which can reduce fume generation rates; (iii) Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation; (iv) Optimize welding process variables to reduce the amount of welding fume generated; and (v) Use a welding fume capture and control system. Monitoring may be required under some circumstances. See the rule to find out what these circumstances are.

Note: The HAP metals regulated by this rule include compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form, with the exception of lead. The rule **ONLY** applies to operations which use or emit these metals. Processes operating using low HAP metal levels may not be regulated. See the rule to find out what these levels are.

Existing Source Compliance:

July 25, 2011:

Each existing source is required to submit an initial notification and meet the compliance requirements.

November 22, 2011:

Each existing source must submit a notification of compliance status.

New Source Compliance:

July 23, 2008:

Each new source is required to meet the compliance requirements upon startup, or by July 23, 2008, whichever is later.

November 20, 2008:

Each new source must submit their initial notification and notification of compliance status within 120 days of startup, or by November 20, 2008, whichever is later.

Annual Reports: Facilities must submit an annual certification of compliance report by January 31st each year, for the previous calendar year.