

6X Metal Fabrication and Finishing Source NESHAP  
Kansas SBEAP

Q&As resulting from a February 24, 2010 Webinar include the following:

Q1. Under welding operations, the regulation mentions only **welding rod** usage. Does the 6X rule apply to flux core **welding wire**, or any welding wire for that matter?

A1. Yes, welding wire is to be considered synonymous with welding rod for the 6X rule.

Q1a. We use two types of wire, a solid welding wire and another with a soft core. We use gas metal arc welding. Are these regulated (assuming they have the targeted metals at regulated concentrations)?

A1a. Yes, see A1.

Q2. If we do "dry grinding" controlled by a baghouse, are we regulated under this NESHAP?

A2. Assuming you are an area source, are primarily engaged in one of the nine source categories in the rule, and are grinding materials that contain at least one of the five metal fabrication and finishing HAPs (MFHAPs) in concentrations above the regulated thresholds, then yes, you are subject to this NESHAP. You may already be in compliance with the required management practices, but would still have to comply with notifications, reporting, and recordkeeping requirements.

Q3. Is dry grinding using a hand tool (polisher) regulated?

A3. The 6X rule does not apply to **hand-held** dry grinding processes.

Q4. Does it matter if emissions vented to a filtration control device are vented inside or outside?

A4. No.

Q5. Can affected sources submit their compliance status with their initial notification by adding a statement on their initial notification form indicating they are in compliance?

A5. It would be more advisable to send in the initial notification form and the notice of compliance status form at the same time, since the notice of compliance status needs additional information.

Q6. Are certifications and compliance reports required to be submitted annually for each affected operation even if they remain in compliance from year to year?

A6. Yes.

Q7. If a company needs to comply with blasting operations, painting, and welding, does it need to submit three separate annual certifications?

A7. Yes. A certification and compliance report for each affected process needs to be submitted annually.