

6X Metal Fabrication and Finishing Source NESHAP Kansas SBEAP

Q&As resulting from a June 1, 2011 Webinar include the following:

Q1: We have a company that takes care of the forms. Do we need anything else?

A1: There is other “paperwork” required, but not submitted to EPA or KDHE, such as records that must be maintained on site that the consultant completing your forms may not take care for you. These include manufacturer’s instructions, paint booth filter records, visual emissions testing forms, etc.

Q2: Some of our products fall under the "military munitions" exemption. Other products, such as gun mounts, are not specifically listed (are they components?), so I'm not sure if they are part of the exemption. Do you know if there's a list of military items that meet the exemption?

A2: This is so specific, we recommend you call your regulatory agency. In KS, call Jeremy at 785-296-1542.

Q3: If we are a major source will we need to comply with any additional requirements by July 25th?

A3: The rule is for area sources only, therefore the rule does not apply to you.

Q4: if my NAICS code or SIC code is not in the list does this rule apply to me?

A4: No

Q5: How often does list of HAP's change and how are we notified?

A5: Since the original list of Hazardous Air Pollutants was created on July 16, 1992, there have been 14 revisions to the list, not just adding or deleting substances, but also to extend comment periods or to revise the implementation schedule. All revisions are posted in the Federal Register. You can also check the EPA website at www.epa.gov/ttn/atw/socatlst/socatpg.html. A list of modifications to the list can be found on the EPA website www.epa.gov/ttn/atw/pollutants/atwsmod.html.

Q6: Could you clarify the Spray Painting rule for "without a spray booth" (Fabricated Structural Metal facilities or any objects over 15 ft). How are they affected and how does it apply?

A6: The spray booth requirements do not apply to affected sources located at Fabricated Structural Metal Manufacturing facilities (SIC 3441 / NAICS 332312), or to affected sources that spray paint objects greater than 15 feet, that are **not painted in spray booths or spray rooms**.

However, the **spray painting management practices** do apply (i.e., use of HVLP paint guns, painter training and certification, and spray gun cleaning requirements).

Q7: Will the SBEAP be sending out letters/emails as a reminder for required submitting forms at certain times?

A7: Unfortunately, we don't have the resources to do that. For this rule, just remember to get your initial notification in by July 25, 2011 and the notification of compliance status by November 22, 2011.

Q8: What's the difference between under/over 2000 lbs of welding wire annually?

A8: Basically, if you use less than 2,000 lbs welding rod/wire annually, just do management practices. If you use 2,000 lbs or more, then in addition to the management practices, conduct visible emissions testing.

Q9: So is a facility in compliance by July 25, 2011 if they have not performed Method 22?

A9: Yes, as long as you have the maintenance practices etc. in place

Q10: Is it okay to wait on performing Method 22 until after July 25, 2011 but before Nov. 22, 2011?

A10: That is fine.

Q11: Is there a form available to document non-applicability?

A11: There is no specific form to indicate the 6X rule is not applicable to your facility. However, SBEAP recommends that you document the process used to determine the rule was not applicable to your facility, and recommends you maintain this documentation at your facility.

Q12: If we are currently under a Class I Air Operating permit, do we need to do any of these additional requirements?

A12: It depends if you are a Class I for HAPS or for criteria pollutants. If you emit less than the 10 or 25 tons of HAPS and have one of the NAICS/SIC code combinations, you need to comply with the rule.