



Minnesota Pollution
Control Agency

NESHAP (part 2)

- Kim Grosenheider, MPCA SBEAP
- Subpart 6X: Metal Fabrication (July 08)
- Other NESHAPs



Subpart 6X Metal Fabrication: Who does it apply to?

- Area source
- Primarily engaged in
 - 9 categories: fabricated metal products, valves and pipe fitting, fabricated structural metal manufacturing ...
- Use material that contain $\geq 0.1\%$ wt Cd, Cr, Pb, Ni or $\geq 1\%$ wt Mn

Metal Fabrication: When does it apply?

- **Initial Notification & Compliance Status**

- Example forms on EPA website-

www.epa.gov/ttn/atw/area/arearules.html

- **Existing** sources by July 25, 2011

- Must be in compliance by then

- **New** sources within 120 days of startup.

- Must be in compliance by startup

Metal Fabrication: What is required?

- Process: **Dry Abrasive Blasting**
- For enclosed & nonvented
 - no control / minimize dust during emptying
- For enclosed & vented
 - filtration control device / minimize excess dust / enclose storage & transport equip
- For > 8 ft w/out filtration control
 - visible emissions monitoring / enclose storage & transport equip / do not reuse blasting material* / use low PM emitting blasting material*

Metal Fabrication: What is required?

- Process: **Dry Machining**
- minimize excess dust

- Process: **Grinding and Dry Polishing with Machines**
- minimize excess dust, filter control device

Metal Fabrication: What is required?

- Process: **Spray Painting** using the targeted HAPs
- Basically, follow 6H Miscellaneous Surface Coating NESHAP requirements
- If 6H & 6X apply, comply with 6X

Metal Fabrication: What is required?

- Process: **Welding**
- Implement 1 or more best management practice
 - Reduced fume generation capabilities
 - Welding process variations
 - Use process materials that reduce fumes
 - Optimize welding process variables
 - Use welding fume capture and control system

Metal Fabrication: What is required?

- Process: **Welding** w/ >2,000 lbs welding rod or wire annually
- Emission Monitoring
 - (all) Tier 1 – Visible EPA Method 22
 - Tier 2 – Opacity Testing EPA Method 9
 - Tier 3 – Site Specific Welding Management Plan

Metal Fabrication: Compliance

- Annual certification & compliance reports
 - Include exceedences report if one occurred
 - Submit by Jan 31
- Keep copies of everything submitted
- Keep records of observations, monitoring, manufacturer's instructions, maintenance & training

Other NESHAPs

- Subpart 6W – plating & polishing
- To come...
- Industrial boilers
- Chemical preparation
- Plastic materials and resins manufacturing

Subpart 6W: Plating and Polishing

Who does it apply to?

- Tanks/processes that contain or use:
 - Cd, Cr, Mn, Ni, or Pb
- In the following process:
 - Non-cyanide electroplating and electroforming (pH<12), and electropolishing
 - Cyanide plating (pH≥12)
 - Electroless plating
 - Other coating, such as chromium conversion
 - Thermal spraying
 - Dry mechanical polishing

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