National Emission Standards for Hazardous Air Pollutants

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National Emission Standards for Hazardous Air Pollutants

GOAL

Understand the purpose of a NESHAP

How to read a NESHAP

Overview of specific NESHAPs
National Emission Standards for Hazardous Air Pollutants

AGENDA

NESHAP Background

NESHAP Examples

For More Information
Overview of NESHAPs

- Federal rules that regulate emissions of toxic air pollutants from a list of industrial sources referred to as “source categories.”
  - Toxic Air pollutants = Hazardous Air Pollutants (HAPs)
Who’s Subject

- Businesses that fall into the regulated source category and meet the applicability requirements.
- Can include both Major Sources and Area (non major) Sources
Who’s Subject

- www.epa.gov/ttn/atw/eparules.html
Who’s Subject

- Major Sources
  - $\geq 10$ tons of single HAP
  - $\geq 25$ tons of combination of HAPs
  - i.e., iron and steel foundries
Who’s Subject

- Area Sources
  - <10 tons of single HAP
  - <25 tons of combination of HAPs
  - i.e., auto body shops, gasoline stations, dry cleaners
Who’s Subject

• **Potential to Emit** = Maximum amount of air contaminants that your source could emit if:
  - Operate at 100% of design capacity;
  - Operated 24hrs/day, 365 days/yr
  - Worse-case materials used or processed 100% of the time
  - No air pollution control equipment
Clean Air Act requires EPA to:

- Identify at least 30 HAPs that pose the greatest potential health threat in urban areas
- Identify the area source categories that represent 90% of the emissions of the 30 urban air toxics
- Subject those area source categories to standards under the CAA
AREA Source NESHAPs

- EPA has identified 70 area source categories which represent 90% of the emissions of the 30 listed air toxics (see page ? of handout)
NESHAP For Paint Stripping and Miscellaneous Surface Coating Operations

40 CFR 63, Subpart HHHHHH
Target Hazardous Air Pollutants: Paint Stripping & Surface Coating (6Hs)

- Methylene Chloride
- Nickel
- Chromium
- Manganese
- Lead
- Cadmium
NESHAP - 6Hs

Regulates Painting Operations at Auto Body Shops & Job Shops

Activities:

- Paint stripping using methylene chloride
- Surface coating of motor vehicles and mobile equipment
- Surface coating of miscellaneous metal and plastic parts
NESHAP - 6Hs

**General Requirements**
- Enclosures and filters
- Type and cleaning of application equipment
- Training

**Paperwork Requirements**
- Notifications
- Recordkeeping
NESHAP - 6Hs

Requirements:

- Enclosures
- Filters
- Type of spray guns
- Cleaning of spray guns
- Training
- Notifications
- Recordkeeping
NESHAP - 6Hs

- More information go to www.michigan.gov/air
  (click on “Clean Air Assistance” then scroll down to “Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources”)
NESHAP for Gasoline Dispensing Facilities

40 CFR 63, Subpart CCCCCC
**Target Hazardous Air Pollutants:**  
**Gasoline Dispensing Facilities (6Cs)**

<table>
<thead>
<tr>
<th>Benzene</th>
<th>Ethylene Dichloride (EDC)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ethylbenzene, hexane, toluene, xylenes, isooctane, naphthalene, cumene, methyl tert-butyl ether</td>
<td></td>
</tr>
</tbody>
</table>

36% of all benzene emissions are from the loading of gasoline into storage tanks
NESHAP – 6Cs

Regulates Gasoline Dispensing Facilities & Tanker Truck Owners/Drivers

Activities:

- BMPs
- Submerged Filling
- Vapor Balance Equipment (Stage I)
NESHAP – 6Cs

- Vapor Balance

![Diagram of fuel and vapor flow](image)
NESHAP – 6Cs

- Compliance with the requirements should be met by January 10, 2011.

- The State is not taking delegation of this NESHAP. The enforcing agency is EPA and all forms need to be sent to EPA.
NESHAP for Metal Fabrication and Finishing

40 CFR 63, Subpart XXXXXX
Targeted HAPs include compounds of:
- Cadmium
- Chromium
- Lead
- Manganese
- Nickel
NESHAP – 6Xs

• Applies only to area sources, where primary activity is one of the following:

  - Electrical & Electronic Equipment Finishing;
  - Fabricated Metals Products;
  - Fabricated Plate Work (Boiler Shops);
  - Fabricated Structural Metal Manufacturing;
  - Heating Equipment (except electric);
  - Industrial Machinery & Equipment Finishing;
  - Iron & Steel Forging;
  - Primary Metal Products Manufacturing;
  - Valves and Pipe Fittings
NESHAP – 6Xs

Requirements for:
• Dry abrasive blasting
• Dry grinding and dry polishing with machines
• Dry machining
• Spray painting
• Welding
NESHAP – 6Xs

- Rule only applies to operations that use or emit these metals.
- Processes using low HAP metals may not be regulated (refer to rule for low HAP levels)
NESHAP – 6Xs

• Existing Sources must be in compliance by July 25, 2011
NESHAP for Reciprocating Internal Combustion Engines

40 CFR 63, Subpart ZZZZ
Target Hazardous Air Pollutants: (RICE MACT)

- Formaldehyde
- Acetaldehyde
- Acrolein
- Methanol
NESHAP - 4Zs

- Affects Both Major and Area Sources
- Originally promulgated - June 15, 2004
- Deadline to Finalize - August 10, 2010
- Requirements vary by size, construction date and location (major or area source).
SAVE THE DATE!

National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines (RICE) Webinar

Wednesday, June 23, 2010, 10:00-11:00 CDT

Attend this event and learn:
- Does this rule apply to you?
- What are the requirements of the rule?
- When are the initial notification and compliance dates?

Cost: FREE
Location: Your personal computer

RSVP online at www.sbeap.org. Look for the link in the yellow box OR call 1-800-578-8898.

Who should attend?
Any industry using a stationary internal combustion engine, including—
- Natural gas liquids producers
- Natural gas transmission
- Crude petroleum and natural gas production
- Medical and surgical hospitals

No cost to participate. Paid for in part by the Kansas Department of Health and Environment (KDHE).
NESHAP for Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (Chrome NESHAP).

40 CFR 63, Subpart N
Chrome NESHAP

Applicability

- facilities that use chromium electroplating tanks, regardless of size.
- Requirements depend upon the size of the operation and the type of process (hard, decorative, or anodizing).
Chrome NESHAP

Requirements

- Emission limits
- Work practice standards
- Performance testing
- Monitoring
- Recordkeeping & Reporting
Chrome NESHAP

- www.michigan.gov/air ("Clean Air Assistance" scroll down to "Chromium Electroplaters")
- Guidance Documents
- Recordkeeping Forms
- Reporting Forms
NESHAP for Asbestos

40 CFR 61, Subpart M
Asbestos NESHAP

- Who Regulates it?
  - DNRE, Asbestos Program
  - MIOSHA
Asbestos NESHAP

- Demolition: removing load-supporting member
- Renovation: removal of asbestos from components
- Work Practice Standards
- Notification of Intent to Renovate/Demolish Form
Asbestos NESHAP

- Notification of Intent to Renovate/Demolish
Asbestos NESHAP

• DNRE, Asbestos Program
• Receive and review notifications.
• Conduct inspections of asbestos removal projects and demolition projects to determine compliance with the NESHAP regulations.
• [www.michigan.gov/air](http://www.michigan.gov/air) (click on “compliance” then “asbestos NESHAP”)
NESHAP for Dry Cleaning Facilities

40 CFR 63, Subpart M
Targeted HAP – Perchloroethylene (perc)

All perc dry cleaner subject

Requirements
  – Control equipment
  – Maintenance
  – Recordkeeping
  – Work practice standards
Other NESHAPs

Area Source NESHAPs

- Iron and Steel Foundries
- Electric Arc Furnace Steelmaking Facilities
- Paints and Allied Products Manufacturing
- Ethylene Oxide Sterilizers

FUTURE - 12/16/2010

- Boilers – Industrial & Institutional/Commercial
- Sewage Sludge Incineration
Does a NESHAP Apply to You?

1. Review list of Source Categories subject to NESHAP
   www.epa.gov/ttn/atw/eparules.html

2. Determine if NESHAP applies to area sources or major sources
   - Area sources = everyone
   - Major sources = determine if you are a major HAP source

3. Review applicability requirements
Basic NESHAP Information to Know:

- **Who** is subject
- **When** you are subject
- **What** you need to do
NESHAP Basics

• Who is subject:
  – Major or Area Source
  – Existing or new
  – Installation/constructi
  on dates
  – Look in applicability
    section

Subpart CCCCCC—National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing

Applicability and Compliance Dates

§ 63.11599 Am I subject to this subpart?
  (a) You are subject to this subpart if you own or operate a facility that performs paints and allied products manufacturing that is an area source of hazardous air pollutant (HAP) emissions and processes, uses, or generates materials containing HAP, as defined in § 63.11607.
  (b) The affected source consists of all paints and allied products manufacturing processes that process, use, or generate materials containing HAP at the facility.
    (1) An affected source is existing if you commenced construction or reconstruction of the affected source on or before June 1, 2009.
    (2) An affected source is new if you commenced construction or
NESHAP Basics

- **When you are subject**
  - Promulgation date
  - Compliance date
  - Initial notification date
  - Compliance notification date
  - Testing dates

§63.11600 What are my compliance dates?

(a) If you own or operate an existing affected source, you must achieve compliance with the applicable provisions in this subpart by December 3, 2012.

(b) If you own or operate a new affected source, you must achieve compliance with the applicable provisions of this subpart by December 3, 2009, or upon startup of your affected source, whichever is later.

(c) If you own or operate a facility that becomes an affected source in accordance with §63.11599(b)(3) after the applicable compliance date in paragraphs (a) or (b) of this section, you must achieve compliance with the applicable provisions of this subpart by the date that you commence processing, using, or generating materials containing HAP, as defined in §63.11607.
NESHAP Basics

- What you need to do
  - Initial notification
  - Notification of compliance
  - Recordkeeping & reporting
  - Work practice standards
  - Control equipment

§ 63.11173 What are my general requirements for complying with this subpart?
   (a) Each paint stripping operation that is an affected area source must implement management practices to

§ 63.11175 What notifications must I submit?
   (a) Initial Notification. If you are the owner or operator of a paint stripping operation using paint strippers containing MeCl and/or a surface coating operation subject to this subpart, you must submit the initial notification required by § 63.9(b). For a new affected source, you must submit the Initial Notification no later than 180 days after initial startup or July 7, 2008, whichever is later. For an existing affected source, you must submit the initial notification no later than January 11, 2010. The initial notification must provide the information specified in paragraphs (a)(1) through (8) of this section.
NESHAP and Your Air Permit

- Requirements incorporated into your permit...eventually.
  - PTI – incorporation depends
  - ROP – incorporation upon renewal

- Still subject to requirements regardless of whether in permit or not.
NESHAP Enforcement

• How are NESHAPs Enforced?
  – State - DNRE
  – US EPA – Regional Offices
Why Comply?

- Healthier work environment
- Reduce solvent and paint purchases
- Reduce waste disposal
- Improved quality of product
- Keep your property clean which reduces liabilities and risk
- Reduce complaints
- Reduce fear of inspections
www.michigan.gov/air
select “Clean Air Assistance” and scroll down to the heading “Federal Regulations” for more information on the NESHAPs.
Need Help?

www.epa.gov/ttn/atw/area/arearules.html
Thank You!

Contact:
Environmental Assistance Program
800-662-9278