



NESHAP 6X Notification of Compliance Status



NOTIFICATION OF COMPLIANCE STATUS FOR NINE METAL FABRICATION AND FINISHING SOURCE CATEGORIES¹ (as amended on November 5, 2019)

This Notification of Compliance Status is to meet the requirements of §63.11519(a) of 40 Code of Federal Regulations (CFR), Part 63, Subpart XXXXXX (6X; *National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories*). Copies of the Federal Register (FR) notices can be found at the links below:

73 FR 43000, July 23, 2008 (<https://www.gpo.gov/fdsys/pkg/FR-2008-07-23/pdf/E8-16263.pdf#page=1>)

More information about NESHAP 6X can be found at the following websites:

Linn County Public Health: <http://www.linncleanair.org/Content/Regulations/Metal-Fabrication-and-Finishing.aspx>

Iowa Air Emissions Assistance Program: <https://iwrc.uni.edu/regulatory-information/neshap/metal-fabrication-and-finishing-source-categories-rule>

Iowa Department of Natural Resources: <http://www.iowadnr.gov/Environmental-Protection/Air-Quality/Air-Toxics-NESHAP>

US Environmental Protection Agency: <https://www.epa.gov/stationary-sources-air-pollution/metal-fabrication-and-finishing-source-categories-national-emission>

Due Date

For new affected sources, this Notification of Compliance Status is due no later than 120 days after initial startup or November 20, 2008, whichever is later. Sources constructed or reconstructed on or after April 3, 2008, are considered new affected sources.

For existing affected sources, this Notification of Compliance Status is due no later than November 22, 2011. Sources constructed or reconstructed before April 3, 2008, are considered existing affected sources.

Name and Address (i.e., physical location) of the Applicable Metal Fabrication and Finishing Source

Print or type the following information for each facility for which you are making this Notification of Compliance Status:

Operating Permit Number (OPTIONAL)		Facility ID Number (IF KNOWN)	
<input type="text"/>		<input type="text"/>	
Facility Name			
<input type="text"/>			
Facility Street Address			
<input type="text"/>			
City	State	Zip Code	
<input type="text"/>	<input type="text"/>	<input type="text"/>	
Facility Local Contact Name	Title	Phone Number	
<input type="text"/>	<input type="text"/>	<input type="text"/>	
Email Address			
<input type="text"/>			

¹ You are subject to NESHAP 6X if you own or operate an area source that is primarily engaged in the operations of one of the *nine metal fabrication and finishing source categories* outlined in 40 CFR §63.11514(a)(1) through (9).

Name and Address of the Owner and the Operator

Print or type the following information for each facility for which you are making this Notification of Compliance Status:

Owner Name

Owner Address

City State Zip Code

Email Address (OPTIONAL)

Operator Name (if different than Owner)

Operator Address (if different than Owner)

City State Zip Code

Email Address (OPTIONAL)

Applicability and Compliance Status

Check the box of each operation at the facility subject to NESHAP 6X. These operations are affected sources under NESHAP 6X only if they use materials that contain or have the potential to emit metal fabrication and finishing hazardous air pollutants (MFHAP)².

- A. Dry abrasive blasting (totally enclosed and unvented blast chambers)
- B. Dry abrasive blasting (vented enclosures with a filtration control device)
- C. Dry abrasive blasting (compliance alternative for objects over 8 feet in any dimension, no filtration control device)
- D. Dry machining
- E. Dry grinding and dry polishing with machines
- F. Spray painting
- G. Welding

Answer the following questions. Initial next to answer that you can support and demonstrate compliance with the requirement. These requirements do not apply when operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP. More detail on these requirements, as well as the monitoring, recordkeeping, and reporting requirements of NESHAP 6X can be found at: <http://www.linncleanair.org/Content/Regulations/Metal-Fabrication-and-Finishing.aspx>.

Answer	Initials	A. Dry Abrasive Blasting: totally enclosed and unvented blast chambers
<input type="checkbox"/> Yes		Is this facility currently in compliance with NESHAP 6X for this operation? The following requirements apply: <ul style="list-style-type: none"> • Minimize dust generation during emptying of enclosure; and • Operate all dry abrasive blasting equipment according to manufacturer's instructions.
<input type="checkbox"/> No		

² MFHAP means any compound of the following metals: cadmium (Cd), chromium (Cr), manganese (Mn), nickel (Ni), or any of these metals in elemental form (with the exception of lead).

Answer	Initials	B. Dry Abrasive Blasting: vented enclosures with a filtration control device
<input type="checkbox"/> Yes		Is this facility currently in compliance with NESHAP 6X for this operation? The following requirements apply: <ul style="list-style-type: none"> • Capture emissions and vent them to a filtration control device; • Minimize excess dust in surrounding areas, as practicable; • Enclose dusty abrasive material storage areas and holding bins, and seal chutes and conveyors that transport abrasive materials; and • Operate all dry abrasive blasting equipment, including the control device, according to manufacturer's instructions.
<input type="checkbox"/> No		

Answer	Initials	C. Dry Abrasive Blasting: compliance alternative for objects over 8 feet in any dimension (no control device)
<input type="checkbox"/> Yes		Is this facility currently in compliance with NESHAP 6X for this operation? The following requirements apply: <ul style="list-style-type: none"> • Perform visible emissions monitoring according to the requirements of NESHAP 6X; • Do not reuse media unless contaminants (e.g., paint residue) have been filtered out and abrasive material conforms to its original size; • Use low particulate matter-emitting media (steel shot, aluminum oxide, specular hematite), whenever practicable; • Minimize excess dust in surrounding areas, as practicable; • Enclose dusty abrasive material storage areas and holding bins, and seal chutes and conveyors that transport abrasive material; and • Operate all dry abrasive blasting equipment according to manufacturer's instructions.
<input type="checkbox"/> No		

Answer	Initials	D. Dry Machining
<input type="checkbox"/> Yes		Is this facility currently in compliance with NESHAP 6X for this operation? The following requirements apply: <ul style="list-style-type: none"> • Minimize excess dust in surrounding areas, as practicable; and • Operate all dry machining equipment according to manufacturer's instructions.
<input type="checkbox"/> No		

Answer	Initials	E. Dry Grinding and Dry Polishing with Machines
<input type="checkbox"/> Yes		Is this facility currently in compliance with NESHAP 6X for this operation? The following requirements apply: <ul style="list-style-type: none"> • Capture emissions and vent them to a filtration control device; • Minimize excess dust in surrounding areas, as practicable; and • Operate all dry grinding and dry polishing equipment, including the control device, according to manufacturer's instructions.
<input type="checkbox"/> No		

Answer	Initials	F. Spray Painting
<input type="checkbox"/> Yes		Is this facility currently in compliance with NESHAP 6X for this operation? The following painting requirements apply: <ol style="list-style-type: none"> 1. Paints must be applied with an HVLP spray gun, electrostatic application, airless spray gun, or an air-assisted airless spray gun, or with equivalent technology that's been approved by the Iowa DNR; 2. Spray gun cleaning must be done with non-HAP containing cleaners or in a way that an atomized mist or spray of cleaning solvent/residual paint is not created outside the container used for collecting the cleaning solvent/residual paint; and 3. All painters must be certified that they have received training on the following: <ol style="list-style-type: none"> (a) spray gun equipment selection, set up, and operation; (b) spray techniques to improve transfer efficiency; (c) routine spray booth and filter maintenance, including filter selection and installation; and (d) environmental compliance with respect to NESHAP 6X.
<input type="checkbox"/> No		The following spray booth / spray room requirements apply, except to painting done at fabricated structural metal facilities (SIC Code 3441), or to painting of objects greater than 15 feet that are not painted in a spray booth or spray room. <ol style="list-style-type: none"> 4. Perform all spray-applied painting in a spray booth or spray room equipped with the following: <ol style="list-style-type: none"> (a) a full roof and all sides covered (at least two complete walls), and ventilated so that air is drawn into the booth and leaves only through the filter; and (b) A filter system that achieves at least 98% capture of MFHAP. 5. Perform regular inspection and replacement of the filters in all spray booths or spray rooms according to manufacturer's instructions; and 6. Spray booths or spray rooms equipped with a water curtain, that are operated and maintained according to the manufacturer's specifications, and that achieve at least 98% control of MFHAP, may be used in lieu of the spray booth / spray room requirements above.

Answer	Initials	G. Welding
<input type="checkbox"/> Yes		Is this facility currently in compliance with NESHAP 6X for this operation? The following requirements apply:
<input type="checkbox"/> No		<ul style="list-style-type: none"> • Operate all welding equipment according to the manufacturer's instructions; • If the facility-wide usage is 2,000 pounds or more of MFHAP-containing welding rod or welding wire annually, perform visible emissions monitoring according to the requirements of NESHAP 6X; and • Implement one or more of the following management practices, as practicable, to minimize emissions of MFHAP: <ol style="list-style-type: none"> (a) use welding processes with reduced fume generation capabilities (e.g., MIG/GMAW); (b) use welding process variations (e.g., pulse current GMAW), which can reduce fume generation rates; (c) use welding filler materials, shield gases, carrier gases, or other process materials, which are capable of reduced welding fume generation; (d) Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, etc.) to reduce the amount of welding fume generated; and (e) use a welding fume capture and control system.

Submittal of Notification of Compliance Status

Maintain a copy of this Notification of Compliance Status for your records. This Notification of Compliance Status should be sent to the following address:

Air Quality Branch
 Linn County Public Health
 1020 6th Street SE
 Cedar Rapids, IA 52401
 Telephone: (319) 892-6000; Fax: (319) 892-6099

A digital copy of this Notification of Compliance Status may be submitted to the e-mail address below so long as the copy submitted is identical to the version retained in the facility records.

ComplianceReporting-Air@linncounty.org

NESHAP 6X requires that facilities submit an Annual Certification and Compliance Report. For existing facilities, the first report will cover the period from July 26, 2011 through December 31, 2011, and will be due no later than January 31, 2012. Subsequent Annual Certification and Compliance Reports will be due on January 31 for the previous calendar year.

Certification

Check the appropriate box below:

- This facility is in compliance with all applicable NESHAP 6X requirements.
- This facility is not in compliance with all applicable NESHAP 6X requirements. Please explain the reason below, and describe any corrective action taken.

Explanation of Noncompliance:

I certify the truth, accuracy, and completeness of this notification.

_____ (Responsible Party³ – Signature)

_____ (Title) _____ (Date)

³ *Responsible Party* (or Responsible Official) is defined under 40 CFR §63.2 as any of the following: the president, vice-president, secretary, or treasurer of the company that owns the plant; the owner of the plant; the plant engineer or supervisor; a government official if the plant is own by the federal, state, city, or county government; or a ranking military officer if the plant is located on a military installation.