



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
OFFICE OF ENVIRONMENTAL ASSISTANCE
SMALL BUSINESS ENVIRONMENTAL ASSISTANCE PROGRAM
8TH FLOOR, L&C ANNEX, 401 CHURCH STREET
NASHVILLE, TN 37243-1551

**Important Environmental Notice: New Emission Standards for Nine
Metal Fabrication and Finishing
Source Categories**

September 30, 2010

Dear Facility Manager:

As a 2nd notice reminder, the Environmental Protection Agency's (EPA) area source rule implements **new emission standards for metal fabrication and metal finishing**. You may view or obtain the rule electronically by visiting: <http://www.epa.gov/ttn/atw/area/fr23jy08.pdf>. It applies to operations that may produce air pollution compounds such as cadmium, chromium, lead, manganese and nickel from metal fabrication and finishing sources. The rule particularly covers **ONLY** sources where the **primary activity** of the facility is in one of the following source categories:

- Electrical and Electronic Equipment Finishing Operations;
- Fabricated Metal Products;
- Fabricated Plate Work (Boiler Shops);
- Fabricated Structural Metal Manufacturing;
- Heating Equipment, except electric;
- Industrial Machinery and Equipment Finishing Operations
(Including construction machinery manufacturing; oil and gas field machinery manufacturing; and pumps and pumping equipment manufacturing);
- Iron and Steel Forging;
- Primary Metal Products Manufacturing; and
- Valves and Pipe fittings

Primary operations may include activities *such as Dry Abrasive blasting, Dry Grinding and Dry Polishing with machines, Dry machining, Spray painting and Welding* at source categories listed above.

You will need to determine if the rule applies to your primary operation. If applicable, the facility owner should understand requirements and take needed steps to achieve compliance by July 25, 2011. Also, you should provide an **Initial Notice** response by **July 25, 2011** if the rule **is or is not** applicable. Lastly, when compliance is achieved, a Notice of Compliance (see SBEAP' web page) should be completed and returned to the State of Tennessee not later than November 22, 2011.

The Small Business Environmental Assistance Program (SBEAP) is encouraging your early review, since certain rule requirements may require lead time and compliance actions.

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In an effort to assist small businesses with this rule, SBEAP has attached a sample **Initial Notice** that may be used to meet a rule reporting requirement. Also, enclosed are assistance tools that include area source rule, a “determination” Flow Chart, and brochure. These and other assistance tools are available on SBEAP’s web page at <http://tn.gov/environment/ea/sbeap/>.

The SBEAP is available to assist you regarding environmental issues that may impact your facility. SBEAP provides free confidential assistance to small businesses to help with environmental matters. If you have questions or want assistance tools for this rule, please contact our office by phone, e-mail or fax.

Note: Any sources located in a local air pollution control program area (Knox, Shelby, Davidson or Hamilton counties) should contact the appropriate local air pollution control agency for instructions.

Sincerely yours,

Harold W. Madison, Environmental Protection Specialist V
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Enclosures