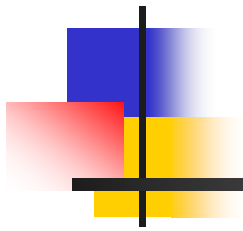


US EPA Area Source Regulations Program Update



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Office of Air Quality Planning and Standards

US EPA

Annual SBEAP Conference

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Current Status

- 70 source categories will be subject to regulation
- 50 source categories have been promulgated; 20 remain to complete and are in Bins 5 and 6.
- Most categories to be completed on June 15, 2009
- Two categories will be extended into 2010 (sewage sludge incineration and commercial/industrial boilers)



Discussions Today

- Metal Fabrication (6X)
- Dry Cleaner Rule Issues
- Paint Stripping/Miscellaneous Coatings (6H) Issues
- Coordination with the Small Business contacts
- Implementation



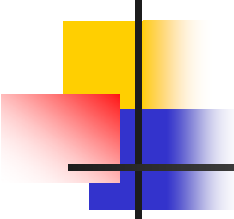
Bin 4 – Metal Fabrication (promulgated June 15, 2008)

- EPA received SBEAP comments on the Metal Fabrication rule and responded -
 - Changed compliance date to 3 years instead of 2 years from publication
 - Eliminated VE monitoring except for outside blasting, and welding above cut-off of 2,000 lb of welding rod containing MFHAP
 - Limited applicability to the rule to operations that use or emit $>0.1\%$ Cd, Cr, Ni, Pb or $>1\%$ Mn (as per OSHA requirements)
 - Allowed higher VOHAP limits for specialty coatings that mirror the Misc Metal Parts rule



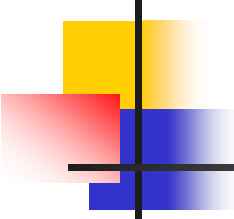
Dry Cleaner rule issues

- Moving of 3rd generation machines
 - States with delegation may determine new source based on their interpretation of the rule
 - EPA has made case-by-case determinations allowing moving pre-existing machines
 - Rule clearly prohibits installations at co-residential sources
- Clarification on Detector readings
 - Rule requires device with <25 ppm (concentration) sensitivity and variable audible or visual signal
 - EPA believes available HHDs are capable despite manufacturers calibration in oz/yr (rate)
 - Side-by-side performance comparison with PID should suffice for inspectors who need confirmation for compliance



Paint Stripping/Miscellaneous Coatings (6H) Issues

- Motor Vehicle and mobile equipment surface coating definition:
 - **Motor vehicle and mobile equipment surface coating was simply a term meant to encompass all "refinishing" operations that were considered in the listing of the autobody refinishing category. The source category ranking was based on refinish activities for all types of motor vehicles and mobile equipment, not just cars; however, it did not include original equipment manufacturing. As the term "refinishing" suggests it was intended to cover repair, refurbishment and refinishing activities.**



Paint Stripping/Miscellaneous Coatings (6H) Issues (cont'd)

- Difference between “coatings” and “miscellaneous surface coatings” definitions -
 - **The definition of “coating” excludes temporary protective coatings, lubricants, or surface preparation materials because they are either temporary coatings or they don't form a solid film and all coatings rules have stated that a coating contain solids to form a film. However, the definition of a “miscellaneous surface coating” operation is essentially the characterization of the affected source, so if a source is spray applying a coating containing a target HAP then they must minimize the emissions at all points in the affected source.**



Remaining Two Bins

- Bin 5 (rules will be promulgated December 15, 2008)
 - Will affect a minimum number of small businesses:
 - Ferroalloys (12 plants expected)
 - Chemical Manufacturing - Sources are primarily large companies



Remaining Two Bins (cont'd)

- Bin 6 includes categories with small business impacts:
 - Copper/Al/Non-ferrous - 1600 facilities
 - Chemical Preparation – 30 facilities
 - Prepared Feeds - 1800 but only <100 emit HAPs of interest)
 - Paint and Allied Products – 2500 facilities
 - Asphalt Roofing – 100 facilities



Working with Rule Writers

- Requirements being considered by rule writers can be shared with SBEAP contacts during pre-proposal (as in Metal Fabrication rule)
- Timing is difficult since Bin 5 finals and Bin 6 proposals may overlap), however small business impacts minimal for Bin 5.
- Specific SBEAP members for a rule would be helpful – contact rule writer (next slide.)



Bin 6 Rule writers

- Aluminum Foundries –

cole.david@epa.gov

Non-ferrous and Copper Foundries –

blais.gary@epa.gov

Chemical Preparation and Asphalt Roofing

johnson.warren@epa.gov

Prepared Feeds –

king.jan@epa.gov

Paint and Allied Products

payne.melissa@epa.gov



Implementation

- 13 brochures and 7 notification examples have been developed – can be found at:
 - <http://www.epa.gov/ttn/atw/area/arearules.html#imp>
- Webcast for the Autobody rule will be held the last week of July
- Collision Repair Campaign in full swing by Regions/OAQPS
 - Website has comprehensive information on resources at:
<http://www.epa.gov/air/toxicair/community/collision.html>
 - Best practices DVD with Jeff Gordon (NASCAR) as speaker will be distributed in early August
- Plain language fact sheets in English and Spanish, will be developed for several rules where a good majority of workers may not understand a brochure or regulatory text.



Implementation (cont'd)

- EPA is developing training sessions for Regional Offices – should help with assisting small businesses on their compliance requirements.
- Metal Fabrication brochures and notification examples will be developed this summer
- Background information, list of all the source categories, and tools can be found on the Area Source Program Website, US EPA



For more information

- Sharon Nizich 919/541-2825
 - Nizich.sharon@epa.gov
- Area Source website with all rules and general information:
 - <http://www.epa.gov/ttn/atw/area/arearules.html>

Appendices:

Descriptions of Bin 6 categories

- Aluminum Foundries (SIC 3363 and NAICS 331521): pouring molten aluminum into molds to manufacture aluminum castings (excluding die casting.) These foundries produce complex metal shapes by melting aluminum or aluminum alloys and pouring the molten metal into a mold to solidify into the desired shape. Aluminum casting accounts for about 11 percent (on a weight basis) of all metal castings in the U.S., and the majority of these castings are for the automotive industry. Processes include melting aluminum ingot, scrap, or combination in a melting furnace; alloying and degassing the molten aluminum (if necessary), pouring the molten aluminum into a mold where it forms the desired shape, cools, and solidifies; and removing the cast from the mold, cleaning (e.g., shot blasting, grinding), and finishing the casting surface.



Appendices (con'td)

- Copper Foundries (NAICS 332111, SIC 3366): Establishments engaged in pouring molten copper into molds to manufacture copper castings. Because most foundries do not have the capability to perform smelting, refining, and chemical analysis of purchased scrap, large quantities of scrap cannot be used and the purchase of ingot with a known chemistry is relied upon as the main raw material. When scrap is used, foundries prefer types of scrap that are small and easily melted (e.g., No. 1 chopped wire). Copper foundry products are shaped castings for industrial and consumer goods, including plumbing products and industrial valves. Other copper foundry products include ship and boat propellers, copper billet, and cast bronze memorials and vases for cemeteries.



Appendices (con'td)

- Nonferrous Foundries (not elsewhere classified) (SIC 3369, NAICS 331528): Establishments engaged in pouring molten nonferrous metals such as nickel, zinc, lead, magnesium, beryllium, and titanium into molds to make nonferrous castings (except aluminum die-castings, nonferrous (except aluminum) die-castings, aluminum castings, and copper castings). Molds may be made from sand or plaster. Facilities in this industry purchase nonferrous metals made in other establishments as raw materials. Products for this industry include parts for motor vehicles and prototypes of machine parts for testing and evaluation prior to mass production.



Appendices (cont'd)

- Prepared Feeds (NAICS code 311119, SIC 2048): The manufacturing of animal food (except for dogs and cats) from ingredients, such as grains, oilseed mill products, and meat products.



Appendices (con'td)

- Paint and Allied Products (NAICS codes 325510, 325520 , 325910, and 325998 (writing and stamp ink only)): Production in liquid or solid form of paints, inks, adhesives, stains, varnishes, shellacs, putties, sealers, caulks, and other coatings, used to leave a dried film of solid material on a substrate. The manufacturing process may include: weighing, mixing, grinding, tinting, thinning, heating, cooking, flushing, and packaging. Not included are: (1) products that do not leave a dried film of solid material on the substrate, such as thinners, paint removers, brush cleaners, and mold release agents; (2) electroplated and electroless metal films; and (3) the manufacture of the raw materials, such as resins, pigments, and solvents, used in the production of paints and coatings.



Appendices (con'td)

- Asphalt Roofing (NAICS 32411, 324122, SIC 2911, 2952): Processing (or “blowing”) of asphalt flux, for use in asphalt roofing manufacturing and other industries, and producing shingles and roll roofing products by applying the “blown” asphalt to inorganic or organic substrates. Asphalt processing is achieved using blowing stills while roofing manufacturing operations involve the use of coaters (for inorganic substrates) and saturator/wet loopers (for organic substrates). Facilities can be stand-alone (i.e., a facility processes asphalt or manufactures roofing materials) or integrated (i.e., asphalt processing and roofing manufacturing operations are conducted at the same facility). The source category does not include hot-mix asphalt facilities or built-up roofing operations.



Appendices (cont'd)

- Chemical Preparation (NAICS 311942, 325199, 325510, and 325998, SIC 2899): Manufacturing of miscellaneous chemical preparations not elsewhere classified, such as, essential oils, fatty acids, waterproofing compounds, water treatment chemicals, plating chemicals, and chemicals for foundry operations. typically include mixing, milling, blending, extrusion, and packaging of various dry and/or wet materials into products or additives used in manufacture of other products. Chemical reactions typically do not occur in chemical preparation manufacturing. Emission points from these types of operations include sources such as raw material hoppers, mixing or blending tanks, mixing extruders, roll mills, and product loading operations.