

FACT SHEET

PROPOSED AIR TOXICS STANDARDS FOR AREA SOURCES IN THE METAL FABRICATION AND FINISHING INDUSTRY

ACTION

- On March 20, 2008 the Environmental Protection Agency (EPA) issued proposed national air toxics standards for smaller-emitting sources, known as area sources, in the metal fabrication and finishing industry. Toxic air pollutants, or air toxics, are known or suspected to cause cancer and other health problems.
- Area sources are commercial and industrial operations that release lesser quantities of toxic pollutants into the air. Area sources emit less than 10 tons per year of a single air toxic, or less than 25 tons per year of a combination of air toxics. Sources that emit more than these amounts are characterized as "major" sources.
- This proposed rule affects management practices, equipment standards, and reporting requirements.
- The proposed rule would codify existing practices and the Agency does not expect the rule would change the level of emissions control already being achieved in the metal fabrication and finishing industry.
- EPA estimates that approximately, 5,800 existing metal fabrication and finishing facilities would be affected by the proposed rule.
- EPA is proposing identical standards for existing and new area sources in the metal fabrication and finishing industry.
- EPA will take public comment on the proposed rule for 30 days following publication in the *Federal Register*.
- EPA will hold a public hearing, if requested. The Agency is under a court order to finalize the rule by June 15, 2008.

PROPOSAL SUMMARY

- The proposed standards would affect any facility that performs metal fabrication or finishing operations in one of the following nine source categories: (1) Electrical and electronic equipment finishing operations (that includes manufacturing of motors and generators, and electrical machinery, equipment, and supplies); (2) Fabricated metal products manufacturing;

(3) Fabricated plate work (boiler shops) manufacturing; (4) Fabricated structural metal manufacturing; (5) Heating equipment manufacturing, except electric; (6) Industrial machinery and equipment: finishing operations (that includes manufacturing of construction machinery, oil and gas field machinery, and pumps and pumping equipment); (7) Iron and steel forging; (8) Primary metal products manufacturing; and (9) Valves and pipe fittings manufacturing.

- We found that these nine area source categories perform the same HAP-emitting operations, and the emissions are controlled in the same way. Consequently, we decided to regulate these sources collectively rather than individually.
- The metal fabrication and finishing operations proposal would cover dry abrasive blasting, dry grinding and dry polishing with machines, metalworking with machines, spray painting and coating, and welding operations that use or emit any of five air toxics: cadmium, chromium, lead, manganese, and nickel.
- The proposed rule would include management practices and equipment standards for the affected metal fabrication and finishing processes. Management practices include regular sweeping or vacuuming of areas around processes, spray gun cleaning techniques that minimize atomization of cleaning material, spray painting worker training, and use of low fume welding techniques. Equipment standards include use of add-on control devices such as cartridge filters; high-volume, low-pressure spray techniques; and paint spraybooth particulate filters.
- The proposal would also cover spray painting and coating operations which use or emit volatile organic compounds that are also toxic air pollutants (VOHAP). The proposed rule would include management practices and equipment standards for the affected operations. Management practices include keeping paint and solvent lids tightly closed when not in use. Equipment standards would require facilities to limit the amount of VOHAP used in their paints and coatings.
- Facilities in this industry would also be required to submit one-time notifications of applicability and compliance status, submit annual compliance certifications including reports of exceedences, perform visible emissions monitoring in a graduated schedule from daily to weekly to monthly, and keep records to show compliance with the requirements of the rule. Most facilities will perform one monthly Method 22 test to show compliance with all the standards in this proposed rule, except for the painting requirements.
- EPA is not proposing performance testing requirements for affected area sources.
- Existing area source metal fabrication and finishing facilities are currently well-controlled in terms of metal air toxics emissions as a result of State and national standards, permitting requirements, OSHA workplace standards, and/or management practices already taken by the industry to reduce air toxics.

- The proposed rule would have little cost impact on existing area sources, averaging approximately \$600 per facility, per year, for monitoring, reporting and recordkeeping.
- EPA is proposing to exempt area sources in the metal fabrication and finishing industry from operating permit requirements called Title V permitting requirements, except where an affected facility is required to obtain a Title V permit for reasons other than being subject to the proposed rule.

BACKGROUND

- The Clean Air Act requires EPA to identify categories of industrial sources that emit one or more of 187 listed toxic air pollutants. These industrial categories include both major and area sources.
- For major sources within each source category, the Clean Air Act requires EPA to develop standards that restrict emissions to levels consistent with the lowest-emitting (also called best-performing) plants. Major sources are those that emit 10 tons a year or more of a single toxic air pollutant or 25 tons a year or more of a combination of air toxics.
- For area sources within each source category, the Clean Air Act allows EPA to develop standards or requirements which provide for the use of generally available control technologies (GACT) or management practices rather than the maximum achievable control technology (MACT) required for major sources.
- Further, the Clean Air Act requires EPA to (1) identify the toxic air pollutants that pose the greatest threat to public health in urban areas and (2) identify and list the area source categories that represent 90 percent of the emissions of the urban air toxics associated with area sources and regulate them to ensure that the emissions of these “urban” air toxics are reduced. EPA implements these requirements through the Integrated Urban Air Toxics Strategy.
- EPA published the Strategy on July 19, 1999, in the *Federal Register* that included:
 - A list of the 33 air toxics that present the greatest threat to public health in the largest number of urban areas. Of these 33 urban air toxics, EPA has identified the 30 with the greatest contribution from smaller commercial and industrial operations or "area" sources, as defined in the Clean Air Act. (See <http://www.epa.gov/ttn/atw/urban/list33.html> for the full list.)
 - A list of 29 area source categories that contribute to the emissions of these 30 listed air toxics. Subsequent notices published on June 26 and November 22, 2002, added 41 source categories to this list of area sources and fulfilled the Clean Air Act requirement to identify and list area source categories for at least 90 percent of the emissions of the 30 “listed” (or area source) HAPs. The nine metal fabrication and finishing source categories included in today’s proposed

rule are included in this list of area sources. For more information, go to <http://www.epa.gov/ttn/atw/urban/urbanpg.html>.

FOR MORE INFORMATION

- To download a copy of the notice, go to EPA's Worldwide Web site at: <http://www.epa.gov/ttn/oarpg/t3pfpr.html>
- Today's proposed rule and other background information are also available either electronically at <http://www.regulations.gov>, EPA's electronic public docket and comment system, or in hardcopy at the EPA Docket Center's Public Reading Room.
- The Public Reading Room is located in the EPA Headquarters, Room Number 3334 in the EPA West Building, located at 1301 Constitution Avenue, NW, Washington, DC. Hours of operation are 8:30 a.m. to 4:30 p.m. eastern standard time, Monday through Friday, excluding Federal holidays.
- Visitors are required to show photographic identification, pass through a metal detector, and sign the EPA visitor log. All visitor materials will be processed through an X-ray machine as well. Visitors will be provided a badge that must be visible at all times.
- Materials for this proposed action can be accessed using Docket ID No. EPA-HQ-OAR-2006-0306.
- HOW TO COMMENT: Comments should be identified by Docket ID No. EPA-HQ-OAR-2006-0306 and submitted by one of the following methods:
 - Federal eRulemaking Portal (<http://www.regulations.gov>)
 - e-mail (a-and-r-docket@epa.gov)
 - Mail (EPA Docket Center, Environmental Protection Agency, Mail code 6102T, 1200 Pennsylvania Avenue, NW, Washington, DC 20460), or
 - Hand delivery (EPA Docket Center, Environmental Protection Agency, Room 3334, 1301 Constitution Avenue, NW, Washington, DC).
- For further information about the proposed rule, contact Dr. Donna Lee Jones of EPA's Office of Air Quality Planning and Standards (OAQPS) at (919) 541-5251 or Jones.Donnalee@epa.gov.