Miscellaneous Metal Parts and Plastic Parts and Products NESHAP
Risk and technology Review

Presented at the Small Business Surface Coating Webinar
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Section 112 of the CAA establishes a two-stage regulatory process to address emissions of hazardous air pollutants (HAP) from stationary sources:

- First stage: EPA identifies categories of sources emitting one or more of the HAP in CAA section 112(b) & then finalize technology-based standards for those sources.

- Second stage: EPA to identify any new technology since the original standards were finalized and evaluate any remaining risk to human health or the environment.

  - **Technology review** – EPA revises standards “as necessary (taking into account developments in practices, processes, and control technologies)” no less frequently than every 8 years (CAA section 112(d)(6)); and

  - **Residual risk review** – EPA revises the standards, if necessary, to provide an ample margin of safety to protect public health or to prevent, taking into consideration costs, energy, safety and other relevant factors, an adverse environmental effect. This review is required within 8 years after the technology-based standards are final (CAA section 112(f)).
368 Miscellaneous metal parts sources (110 small businesses);
125 Plastic parts and products sources (35 small businesses);

Affected source: the collection of all coating operations; storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed; manual and automated equipment and containers used for conveying coatings, thinners, cleaning materials; and waste materials generated by a coating operation.

Original NESHAP compliance options: 1) compliant materials, 2) average emissions limit without add-on controls and 3) average emissions limit with add-on controls.

RTR results: No developments in technology identified; risk are acceptable.

RTR Rule changes:
- Addition of requirements for Electronic Reporting of test data, notifications and compliance reports;
- Revisions to startup, shutdown and malfunction to address recent court decisions; and
- Require periodic testing of control devices once every five years.
Small Business Cost Impacts

- Recordkeeping and reporting per facility:
  - Read and understand the rule amendments;
  - Reconsider SSM systems due to elimination of the SSM exemption;
  - Familiarization with CEDRI and the reporting template based on requirement to submit notifications & compliance reports using CEDRI ([https://www.epa.gov/electronic-reporting-air-emissions/cedri](https://www.epa.gov/electronic-reporting-air-emissions/cedri))

- Performance testing no less frequently than every 5 years for sources using the add-on controls compliance option.
  - Metal Parts: seven major source facilities would incur costs to conduct periodic testing at a total cost in a single year of $133,000.
  - Plastic Parts: three major source facilities would incur costs to conduct periodic testing at a cost in a single year of $57,000.
Small Business Economic Impacts--Metal

- Metal Parts:
  - Total cost: ~$960,000 for 368 affected entities in the first year of the rule;
  - Additional $170,000 in testing and reporting costs for seven facilities in the third year of the rule and every 5 years thereafter;
  - 368 affected facilities owned by 265 different parent companies
  - Total costs associated with the proposed requirements range from 0.000002 to 0.25 percent of annual sales revenue per ultimate owner; and
  - Costs are not expected to result in a significant market impact, regardless of whether they are passed on to the purchaser or absorbed by the firms.
Small Business Economic Impacts--Plastic

- Plastic Parts:
  - Total cost: ~$330,000 for 125 affected entities in the first year of the rule;
  - Additional $74,000 in testing and reporting costs for three facilities in the third year of the rule and every 5 years thereafter;
  - 125 affected facilities owned by 94 different parent companies, and the total costs associated with the proposed requirements range from 0.000008 to 0.22 percent of annual sales revenue per ultimate owner; and
  - Costs are not expected to result in a significant market impact, regardless of whether they are passed on to the purchaser or absorbed by the firms.
Small Business Screening Assessment

- EPA prepared small business screening assessment to determine whether any of the identified affected entities are small entities, as defined by the U.S. Small Business Administration:
  - Metal Parts: 110 are small entities;
  - Annualized costs for the 103 owners of the 110 affected small entities range from 0.001 to 0.25 percent of annual sales revenues per owner.
  - Plastic Parts and Products: 35 are small entities.
  - Annualized costs for the 35 owners of the 35 affected small entities range from 0.0009 to 0.22 percent of annual sales revenues per ultimate owner.

- Results: There are no significant economic impacts on a substantial number of small entities from these proposed amendments.
Compliance and Emissions Data Reporting Interface (CEDRI)

Update for Small Businesses
September 4, 2019
What is CEDRI?

- Compliance and Emissions Data Reporting Interface (CEDRI) is a system where affected sources can electronically submit performance test reports, notification reports, and periodic (compliance) reports to EPA based on EPA regulations codified in 40 CFR Parts 60, 62, and 63.

- Access to CEDRI application: https://cdx.epa.gov/
Modernizing CEDRI for Industry Users in Fall/Winter 2019

- Streamlined Report Selection
- Updated Look and Feel
- Intuitive Navigation
- Simplified Workflow
- Alerts and Notifications
- Streamlined Certification Process
Resources

CEDRI website
- [https://www.epa.gov/electronic-reporting-air-emissions/cedri](https://www.epa.gov/electronic-reporting-air-emissions/cedri)
- Job Aides/Tutorials
- Alerts/Announcements
- Access to Final Report Templates for Semiannual Compliance Reports

Electronic Reporting Tool (ERT) website
- Performance Test Reports
- ERT download

Future Webinars covering CEDRI in more detail
- Registration
- CEDRI Roles
- Accessing Reports
- Submission Process