

THREE AREA SOURCE NESHAP RULES

“6H”: PAINT STRIPPING AND MISCELLANEOUS SURFACE COATING OPERATIONS

“6X”: METAL FABRICATION AND FINISHING

“6W”: PLATING AND POLISHING OPERATIONS



NESHAP FOR PAINT STRIPPING AND MISCELLANEOUS SURFACE COATING OPERATIONS

40 CFR PART 63, SUBPART HHHHHH, "THE 6H RULE"

- Applies to any motor vehicle and mobile equipment surface coating operation (body shop) that is an area source of HAPs
- Also applies to other coating operations that use target HAP containing coatings
- Target HAPs are nickel, cadmium, manganese, chromium, and lead
- Autobody shops can submit petition to EPA to be exempt if they use no target HAP in their coatings (i.e., target HAPs below certain percentages)

THE 6H RULE

PROBLEMS OBSERVED

- Inadequate training or certification of painters
- Painting in a prep area that does not meet spray booth requirements
- Using an improper spray booth or no spray booth (painting outside)
- Spray booth not at negative pressure
- Inadequate filtration in spray booth
- Improper Spray Guns
- Cleaning Guns with Atomization

NESHAP FOR METAL FABRICATING AND FINISHING OPERATIONS

40 CFR PART 63, SUBPART XXXXXX, "THE 6X RULE"

- Subject Facilities
 - Area sources of metal fabrication and finishing metal HAP (MFHAP)
 - Primarily engaged in one of nine metal fabrication and finishing source categories (Ex: Heating Equipment)
- Applies to blasting, machining, grinding, spray painting, and welding operations
- Requirements
 - General management practices such as dust minimization and inspections
 - Filtration control devices and enclosures
 - Visible emissions monitoring for welding sources
 - Notification, recordkeeping, reporting

THE 6X RULE

PROBLEMS OBSERVED

- General failure to comply (facility is unaware they are subject)
 - Failure to submit initial notifications
 - Non-compliance with work practices, record keeping, and reporting
 - One facility was observed to comply with some provisions despite being unaware of the rule
- Facilities can be subject to the rule but have no applicable provisions
 - At minimum, need to send in initial notification

NESHAP FOR PLATING AND POLISHING OPERATIONS

40 CFR PART 63, SUBPART WWWW, “THE 6W RULE”

- Applies to area sources of HAP w/ tanks/processes that contain or use any compounds of cadmium, chromium, manganese, nickel, or lead
- Operations include: Electroplating & Electroforming, Electropolishing, Electroless Plating, Thermal Spraying, and Dry Mechanical Polishing
- Specific Requirements
 - Tank Cover
 - Control Device
 - WAFS
 - Limit Plating Time
 - Best Management Practices

THE 6W RULE

PROBLEMS OBSERVED

- Similar to 6X: facilities are unaware they are subject
 - Failure to submit initial notifications
 - Non-compliance with work practices, record keeping, and reporting
 - Failure to utilize tank covers, mist eliminators, and scrubbers
- Facilities may be complying with many control requirements (surfactant usage) but not recordkeeping and reporting requirements
 - At minimum, need to send in initial notification

QUESTIONS?

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