IOWA DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY BUREAU

Notification of Compliance Status

Area Source Rule for Nine Metal Fabrication and Finishing Source Categories
40 Code of Federal Regulations (CFR) 63.11514 – 63.11523 Subpart XXXXXX (6X)

*This notification is due no later than **November 22, 2011,** for existing facilities (initial startup was before April 3, 2008), and within 120 days of startup for new facilities (initial startup on or after April 3, 2008).*

1. Facility Information

Facility Name: _____ Facility Number (if known): _____

Facility Address: _____

City: _____ State: _____ Zip: _____

Owner/Operator Name: _____ Title: _____

Mailing Address (if different): _____

City: _____ State: _____ Zip: _____

Phone number: _____ Email (if available): _____

2. 6X Affected Source

Instructions: Please check each of the operations below that are subject to Subpart 6X. It is important to remember that these operations are subject to Subpart 6X only if they use materials that contain or have the potential to emit Metal Fabrication and Finishing HAP. Metal fabrication and finishing HAP (MFHAP) means any compound of the following metals: cadmium, chromium, lead, manganese, or nickel, or any of these metals in the elemental form, with the exception of lead.

- ☐ A. Dry abrasive blasting: totally enclosed and unvented blast chambers
- ☐ B. Dry abrasive blasting: vented enclosures with a filtration control device
- ☐ C. Dry abrasive blasting: compliance alternative for objects over 8 feet in any dimension (no filtration control device)
- ☐ D. Dry machining
- ☐ E. Dry grinding and dry polishing with machines
- ☐ F. Spray painting
- ☐ G. Welding

Note: The next section contains a brief summary of NESHAP Subpart 6X equipment requirements and management practices. These requirements do not apply when operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP. More detail on these requirements, as well as the monitoring, recordkeeping, and reporting requirements of 6X can be found at http://iwrc.org/6X.

3. Compliance Information

Instructions: For each of the operations checked in Section 2, please go to the corresponding letter below, review the summary of requirements, and check the appropriate box to indicate whether the facility is currently in compliance.

A. Dry abrasive blasting: totally enclosed and unvented blast chambers

Is this facility currently in compliance with 6X requirements for this operation? **Yes** ☐ **No** ☐

Summary of requirements:

- Minimize dust generation during emptying of enclosure
- Operate all dry abrasive blasting equipment according to manufacturer's instructions

B. Dry abrasive blasting: vented enclosures with a filtration control device

Is this facility currently in compliance with 6X requirements for this operation? **Yes** ☐ **No** ☐

Summary of requirements:

- Capture emissions and vent them to a filtration control device
- As practicable, minimize excess dust in surrounding areas
- Enclose dusty abrasive material storage areas and holding bins, and seal chutes and conveyors that transport abrasive materials
- Operate all dry abrasive blasting equipment, including the control device, according to manufacturer's

instructions

C. Dry abrasive blasting: compliance alternative for objects over 8 feet in any dimension (no filtration control device)

Is this facility currently in compliance with 6X requirements for this operation? **Yes** ☐ **No** ☐

Summary of requirements:

- Perform visible emissions monitoring according to the requirements of Subpart 6X
- Do not reuse media unless contaminants (e.g. paint residue) have been filtered out and abrasive material conforms to its original size
- Whenever practicable, use low PM-emitting media (steel shot, aluminum oxide, specular hematite)
- As practicable, minimize excess dust in surrounding areas
- Enclose dusty abrasive material storage areas and holding bins, and seal chutes and conveyors that transport abrasive materials
- Operate all dry abrasive blasting equipment according to manufacturer's instructions

D. Dry machining

Is this facility currently in compliance with 6X requirements for this operation? **Yes** ☐ **No** ☐

Summary of requirements:

- As practicable, minimize excess dust in surrounding areas
- Operate all dry machining equipment according to manufacturer's instructions

E. Dry grinding and dry polishing with machines

Is this facility currently in compliance with 6X requirements for this operation? **Yes** ☐ **No** ☐

Summary of requirements:

- Capture emissions and vent them to a filtration control device
- As practicable, minimize excess dust in surrounding areas
- Operate all dry grinding and dry polishing equipment, including the control device, according to manufacturer's instructions

F. Spray painting

Is this facility currently in compliance with 6X requirements for this operation? **Yes** ☐ **No** ☐

Summary of painting requirements:

- Paints must be applied with an HVLP spray gun, electrostatic application, airless spray gun, or an air-assisted airless spray gun, or with equivalent technology that's been approved by the Iowa DNR
- Spray gun cleaning must be done with non-HAP containing cleaners or in a way that an atomized mist or spray of cleaning solvent/residual paint is not created outside the container used for collecting the cleaning solvent/residual paint
- All painters must be certified that they have received training on the following:
  - Spray gun equipment selection, set up, and operation
  - Spray techniques to improve transfer efficiency
  - Routine spray booth and filter maintenance, including filter selection and installation
  - Environmental compliance with respect to NESHAP Subpart 6X

Summary of spray booth/spray room requirements:

These requirements don't apply to painting done at a fabricated structural metal facility (SIC Code 3441), or to painting of objects greater than 15 feet that are not painted in a spray booth or spray room.

- Perform all spray-applied painting in a spray booth or spray room equipped with the following:
  - A full roof and all sides covered (at least two complete walls), and ventilated so that air is drawn into the booth and leaves only though the filter
  - A filter system that achieves at least 98% capture of MFHAP
- Perform regular inspection and replacement of the filters in all spray booths or spray rooms according to manufacturer's instructions
- Compliance alternative: spray booths or spray rooms equipped with a water curtain, that are operated and maintained according to the manufacturer's specifications, and that achieve at least 98% control of MFHAP, may be used in lieu of the spray booth/spray room requirements above

G. Welding

Is this facility currently in compliance with 6X requirements for this operation? **Yes** ☐ **No** ☐

Summary of requirements:

- Operate all welding equipment according to manufacturer's instructions
- Implement one or more of the management practices, as practicable, to minimize emissions of MFHAP:

- Use welding processes with reduced fume generation capabilities (e.g. MIG/GMAW)
- Use welding process variations (e.g. pulse current GMAW) which can reduce fume generation rates
- Use welding filler materials, shielding gases, carrier gases, or other processes materials which are capable of reduced welding fume generation
- Optimize welding process variables (e.g. electrode diameter, voltage, amperage, welding angle, etc.) to reduce the amount of welding fume generated
- Use a welding fume capture and control system

- If facility-wide usage is 2,000 pounds or more of MFHAP-containing welding rod or welding wire annually, perform visible emissions monitoring according to the requirements of Subpart 6X

4. Explanation of Noncompliance

Instructions: If you indicated in Section 3 that the facility is not currently in compliance with any Subpart 6X requirement, please explain the reason below, and outline a plan for achieving compliance with 6X.

5. Certification

Responsible Official Certification		
☐	**I certify the truth, accuracy, and completeness of this notification.**	
Responsible Official Name	Responsible Official Signature	Date

6. Addresses

Instructions: Submit this notification to the agency(ies) below. Be sure to keep a copy of this notification on file at your facility.

Iowa Department of Natural Resources
NESHAP Coordinator
7900 Hickman Ste 1
Windsor Heights IA 50324

If the facility is located in either Linn County or Polk County, this notification shall also be submitted to the appropriate county office:

Polk County Public Works – Air Quality Division
5885 NE 14th St, Des Moines IA 50313

Linn County Public Health - Air Quality Division
501 13th St NW, Cedar Rapids IA 52405

7. Additional Information

Websites:

More detail on the requirements outlined on this form, as well as the monitoring, recordkeeping, and reporting requirements of Subpart 6X can be found on the following websites:

- Iowa Air Emissions Assistance Program: http://iwrc.org/6X
- Iowa DNR: http://www.iowadnr.gov/InsideDNR/RegulatoryAir/AreaSourceToxicsNESHAP.aspx
- US EPA: http://www.epa.gov/ttn/atw/6x/6xpg.html

Additional reporting requirements:

Subpart 6X requires that facilities submit an annual certification and compliance report. For existing facilities, the first report will cover the period from July 26, 2011 through December 31, 2011, and will be due no later than January 31, 2012.