

**Nine Metal Fabrication and Finishing Source Categories**  
**40 Code of Federal Regulations (CFR) Part 63, Subpart XXXXXX (6X NESHAP)**  
**General Summary of Requirements**

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The Nine Metal Fabrication and Finishing Source Categories - Area Source<sup>1</sup> NESHAP<sup>2</sup> (6X NESHAP) regulations apply to the following facilities:

- Facilities that are **primarily engaged**<sup>3</sup> in one of the following source categories (SIC codes are in parenthesis):
  1. Electrical and Electronic Equipment Finishing Operations (including motor and generator manufacturing; electrical machinery, equipment and supplies, not elsewhere classified) (**3621, 3699**);
  2. Fabricated Metal Products, not elsewhere classified (**3499**);
  3. Fabricated Plate Work (Boiler Shops) (**3443**);
  4. Fabricated Structural Metal Manufacturing (**3441**);
  5. Heating Equipment, except Electric (**3433**);
  6. Industrial Machinery and Equipment Finishing Operations (including construction machinery manufacturing; oil and gas field machinery manufacturing; and pumps and pumping equipment manufacturing) (**3531, 3533, 3561**);
  7. Iron and Steel Forging (**3462**);
  8. Primary Metal Products Manufacturing (**3399**); and
  9. Valves and Pipe Fittings, not elsewhere classified (**3494**)Many facilities perform the metal fabrication and finishing processes addressed by this rule, but will not be subject to it unless they are primarily engaged in one of the above listed source categories.
  
- Facilities that
  1. have the **potential to emit a metal fabrication or finishing HAP (MFHAP)**. A MFHAP is any compound of **cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn) or nickel (Ni)**, or any of these metals in the elemental form with the exception of lead.  
Or
  2. **use materials that contain a MFHAP**. These are materials that contain **cadmium (Cd), chromium (Cr), lead (Pb), or nickel (Ni)** in amounts **greater than or equal to 0.1 percent by weight of the metal**, and materials that contain **manganese (Mn)** in amounts **greater than or equal to 1.0 percent by weight of the metal**, as shown in formulation data provided by the manufacturer or supplier, such as a Material Safety Data Sheet (MSDS).
  
- Facilities that have one of the following industrial processes will be regulated if the facilities have **the potential to emit MFHAP or use materials that contain a MFHAP**.
  1. Dry abrasive blasting
  2. Machining
  3. Dry Grinding and Dry Polishing with machines
  4. Spray Painting
  5. Welding

**The specific standards and management practices for each industrial process covered under the 6X NESHAP are described on individual, supplemental fact sheets.**

- Sources that are **EXEMPT** from the 6X NESHAP include:
  1. Research or laboratories facilities;
  2. Tool or equipment repair operations, facility maintenance, or quality control activities (as defined in the 6X NESHAP);

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<sup>1</sup> An Area Source is a source of Hazardous Air Pollutants (HAP) that is not a major source. An area source of HAP emits or has the potential to emit less than 10 tons of any single HAP and less than 25 tons of any combination of HAP in a 12 month period

<sup>2</sup> NESHAP – National Emissions Standards for Hazardous Air Pollutants

<sup>3</sup> Facilities are primarily engaged in a source category if the production of one or more products listed in these categories represents at least 50% of the production at the facility. Production quantities are established by the volume, liner foot, square foot, or other value suited to the specific industry and are based on the previous continuous 12 months of operation. Facilities must document and retain their rationale if they determine their facility is not primarily engaged in one of the source categories

3. Operations performed at installations owned or operated by the US Armed Forces (including the National Guard), NASA, or the National Nuclear Security Administration; and
4. Operations that produce military munitions manufactured by or for the US Armed Forces, or equipment directly and exclusively used for the purposes of transporting military munitions.

#### **GENERAL NOTIFICATION AND REPORTING REQUIREMENTS**

In addition to the standards, management practices, reporting and recordkeeping required for each industrial process (see supplemental fact sheets), each facility subject to the 6X NESHAP must also submit the following notifications.

##### **Initial Notifications:**

- Existing Sources** submit no later than **July 25, 2011**.
- New Sources** submit no later than **120 days after initial startup** or **November 20, 2008**, whichever is later.
- Metal fabrication** and **finishing facilities** are required by EPA to submit a notification even if there is no affected process.
- Must **include** the following information:
  1. Name, address, phone number, and e-mail address of the owner/operator.
  2. Address of the affected source.
  3. Statement indicating the facility is subject to this standard (40 CFR Part 63, Subpart XXXXXX).
  4. Brief description of facility operations.

##### **Notifications of Compliance Status:**

- Existing Sources** submit no later than **November 22, 2011**.
- New Sources** submit no later than **120 days after initial startup** or **November 20, 2008**, whichever is later.
- Must **include** the following information:
  1. Company's name and address.
  2. A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with the relevant standards of this rule.
  3. Date of notification of compliance status.

Please refer to the full rule text of [40 CFR Part 63, Subpart XXXXXX](#) to determine all applicable equipment requirements, management practices, monitoring requirements, recordkeeping requirements and reporting requirements necessary to be in compliance with this rule. Additional information is available on [DNR Air Toxics Page](#)

##### **For more information or questions please contact:**

Iowa Department of Natural Resources: **1-877-AIR-IOWA**

Iowa Waste Reduction Center: **1-800-422-3109**

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**Nine Metal Fabrication and Finishing Source Categories**  
**40 Code of Federal Regulations (CFR) Part 63, Subpart XXXXXX (6X NESHAP)**  
**Summary of Requirements: Industrial Process – Dry Abrasive Blasting**

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Dry abrasive blasting is defined as cleaning, polishing, conditioning, removing or preparing a surface by propelling a stream of abrasive material with compressed air against a surface. Hydro blasting, wet abrasive blasting, or other abrasive blasting operations which employ liquids to reduce emissions are not dry abrasive blasting.

The following requirements shall be followed only if the facility's **dry abrasive blasting** operations have the potential to emit a **MFHAP** or use materials that contain a **MFHAP**.

**REQUIRED MANAGEMENT PRACTICES**

- Operate all equipment associated with operations (including control equipment) according to the manufacturer's instructions.
- For non-vented, completely enclosed operations:**
  1. Minimize dust generation during emptying of abrasive blasting enclosures to reduce MFHAP emissions.
- For vented enclosures:**
  1. Capture emissions and vent them to a filtration control device.
  2. Enclose dusty abrasive material storage areas and holding bins and seal chutes and conveyors that transport abrasive materials.
- For items that exceed 8 feet in any dimension.** As an alternative to venting emissions to a filtration control device, facilities may follow these control measures:
  1. Minimize excess dust in the surrounding area to reduce MFHAP emissions.
  2. Enclose abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials.
  3. Do not reuse the blasting media unless contaminants have been removed via filtration or screening and the abrasive material conforms to its original size.
  4. Switch from high particulate matter (PM)-emitting blasting media (e.g. sand) to low PM-emitting blasting media (e.g. steel shot) when practicable.
  5. Perform visual determinations of fugitive emissions and keep record of visual determinations.

**MONITORING REQUIREMENTS**

Visual determinations of fugitive emissions shall take place at the property border nearest to the abrasive blasting operation (if performed outdoors) or at the primary vent, stack, exit, or opening from the building containing the operations (if performed indoors).

Visual determinations for abrasive blasting operations shall take place using EPA Method 22 while the source is operating under normal conditions. According to procedures of EPA Method 22 of 40 CFR part 60, the reading must last at least fifteen (15) minutes. Follow the schedule shown in Figure 1.

Under EPA Method 22, fugitive emissions are considered detected if they are visible for more than six (6) minutes in any fifteen (15) minute period. If fugitive emissions are detected, perform corrective actions and follow-up inspections.

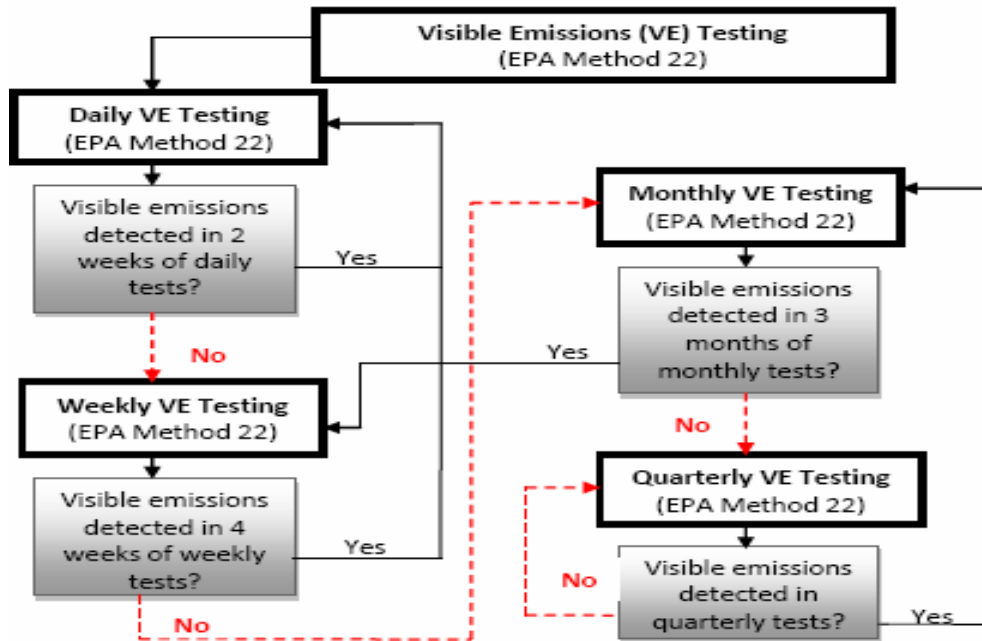


Figure 1. Visual Determination of Fugitive Emissions

## RECORD KEEPING AND REPORTING REQUIREMENTS

In addition to the required initial notification and notification of compliance status (see general 6X NESHAP fact sheet), facilities with this industrial process that have the potential to emit a MFHAP or use materials that contain a MFHAP must also comply with the reporting and recordkeeping requirements below.

### Annual Certification and Compliance Reports

- Submit** no later than **January 31 of each year**.
  1. Cover the period from January 1 (or day after compliance date) to December 31 of the previous year.
- Report** should include the following information:
  1. Facility's name and address.
  2. Statement by responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
  3. Date of report and of beginning and ending dates of reporting period.
  4. Report of visual determinations of fugitive emissions (EPA Method 22). Report date(s) when visible emissions were detected, subsequent corrective actions taken and the dates and results of the follow-up visual determination of fugitive emissions.
- These reports must be kept in a readily-accessible location for inspector review.

### Record Keeping

- The following records must be maintained in a form suitable and readily available for expeditious review.
  1. Copies of all notifications and reports, and supporting documentation.
  2. Records of applicability determinations.
  3. Records associated with visual determinations of fugitive emissions (EPA Method 22).
  4. Manufacturer's specifications for control devices.
  5. Copy of the manufacturer's instructions for equipment used for compliance.

Records must be maintained for five years. The first two years of records must be maintained on-site. Older records may be maintained off site.

Please refer to the full rule text of [40 CFR Part 63, Subpart XXXXXX](#) to determine all applicable equipment requirements, management practices, monitoring requirements, recordkeeping requirements and reporting requirements necessary to be in compliance with this rule. Additional information is available on [DNR Air Toxic Page](#).

**For more information or questions please contact**  
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**Nine Metal Fabrication and Finishing Source Categories**  
**40 Code of Federal Regulations (CFR) Part 63, Subpart XXXXXX (6X NESHAP)**  
**Summary of Requirements: Industrial Process – Machining**

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Machining is defined as dry metal turning, milling, drilling, boring, tapping, planning, broaching, sawing, cutting, shaving, shearing, threading, reaming, shaping, slotting, hobbing, and chamfering with machines. Cutting and shearing operations include punching, piercing, blanking, cutoff, parting, shearing and trimming. Forming operations include bending, forming, extruding, drawing, rolling, spinning, coining, and forging of the metal. **Processes using hand-held devices and any process employing fluids for lubrication or cooling are not subject to the 6X NESHAP requirements.**

The following requirements shall be followed only if the facility's **machining** operations have the potential to emit a **MFHAP** or use materials that contain a **MFHAP**.

**REQUIRED MANAGEMENT PRACTICES**

- Operate **all** equipment associated with operations (including control equipment) according to the manufacturer's instructions.
- Minimize** excess dust in the surrounding area to reduce MFHAP emissions.

**RECORD KEEPING AND REPORTING REQUIREMENTS**

In addition to the required initial notification and notification of compliance status (see general 6X NESHAP fact sheet), facilities with this industrial process that have the potential to emit a MFHAP or use materials that contain a MFHAP must also comply with the reporting and recordkeeping requirements below.

**Annual Certification and Compliance Reports**

- Submit** no later than **January 31 of each year**.
  1. Cover the period from January 1 (or day after compliance date) to December 31 of the previous year.
- Report** should include the following information:
  1. Facility's name and address.
  2. Statement by responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
  3. Date of report and of beginning and ending dates of reporting period.

These reports must be kept in a readily-accessible location for inspector review.

**Record Keeping**

- The **following** records must be maintained in a form suitable and readily available for expeditious review.
  1. Copies of all notifications and reports, and supporting documentation.
  2. Records of applicability determinations.
  3. Manufacturer's specifications for control devices.
  4. Copy of the manufacturer's instructions for equipment used for compliance.Records must be maintained for five years. The first two years of records must be maintained on-site. Older records may be maintained off site.

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**Nine Metal Fabrication and Finishing Source Categories**  
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**Summary of Requirements: Industrial Process – Dry Grinding and Polishing with Machines**

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Dry grinding, and dry polishing with machines is defined as grinding or polishing without the use of lubricating oils or fluids in fixed or stationary machines. Grinding is a process performed on a work piece to remove undesirable material from the surface or to remove burrs or sharp edges. Grinding is done using belts, disks, or wheels consisting of or covered with various abrasives. Polishing is performed using hard-faced wheels constructed of muslin, canvas, felt or leather, and typically employs natural or artificial abrasives. **Hand grinding, hand polishing, and bench top dry grinding and dry polishing are not subject to the requirements of the 6X NESHAP.**

The following requirements shall be followed only if the facility's **dry grinding with machines** or **dry polishing with machines** has the potential to emit a **MFHAP** or use materials that contain a **MFHAP**.

**REQUIRED MANAGEMENT PRACTICES**

- Operate all equipment associated with operations (including control equipment) according to the manufacturer's instructions.
- Minimize excess dust in the surrounding area to reduce MFHAP emissions.
- Capture emissions and vent them to a filtration control device.

**RECORD KEEPING AND REPORTING REQUIREMENTS**

In addition to the required initial notification and notification of compliance status (see general 6X NESHAP fact sheet), facilities with this industrial process that have the potential to emit a MFHAP or use materials that contain a MFHAP must also comply with the reporting and recordkeeping requirements below.

**Annual Certification and Compliance Reports**

- Submit** no later than **January 31 of each year**.
  1. Cover the period from January 1 (or day after compliance date) to December 31 of the previous year.
- Report** should include the following information:
  1. Facility's name and address.
  2. Statement by responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
  3. Date of report and of beginning and ending dates of reporting period.

These reports must be kept in a readily-accessible location for inspector review.

**Record Keeping**

- The following records must be maintained in a form suitable and readily available for expeditious review.
  1. Copies of all notifications and reports, and supporting documentation.
  2. Records of applicability determinations.
  3. Manufacturer's specifications for control devices.
  4. Copy of the manufacturer's instructions for equipment used for compliance.

Records must be maintained for five years. The first two years of records must be maintained on-site. Older records may be maintained off site.

Please refer to the full rule text of [40 CFR Part 63, Subpart XXXXXX](#) to determine all applicable equipment requirements, management practices, monitoring requirements, recordkeeping requirements and reporting requirements necessary to be in compliance with this rule. Additional information is available on [DNR Air Toxic Page](#).

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**Nine Metal Fabrication and Finishing Source Categories**  
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**Summary of Requirements: Industrial Process – Spray Painting**

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Spray painting is defined as the application of paints using a hand-held device that creates an atomized mist of paint and deposits the paint on a substrate. For the purpose of the 6X NESHAP, spray painting does **not** include:

- Use of spray guns with a paint cup capacity less than 3.0 fluid ounces;
- Use of hand-held, non-refillable aerosol containers;
- Powder coating or non-atomization applications of paint (e.g. dip/brush/flow coating);
- Applications that normally require use of an airbrush or gun extension;
- Paints that contain fillers that adversely affect HVLP (high-volume, low pressure) gun performance;
- Application of paint which has a dried film of less than 0.0005 inch;
- Thermal spray operations (e.g. metal spraying or metalizing).

The following requirements shall be followed only if the facility's **spray painting** operations have the potential to emit a **MFHAP** or use materials that contain a **MFHAP**.

**REQUIRED MANAGEMENT PRACTICES**

These requirements do not apply to affected sources located at fabricated structural metal manufacturing facilities, or to affected sources that spray paint objects greater than 15 feet, and that are not painted in spray booths or spray rooms.

- Operate all equipment associated with operations (including control equipment) according to the manufacturer's instructions.
  1. Filters must be inspected and replaced according to the manufacturer's instructions.
- Spray booths or spray rooms must:
  1. Have a full roof.
  2. Have all the sides covered (at least two complete walls and barriers or curtains on the other sides).
  3. Be ventilated (air is drawn into the booth and leaves only through the filter).
  4. Have a filter system or be equipped with a water curtain that is demonstrated to achieve at least 98% capture of MFHAP.
- All spray-applied paints must be applied with a HVLP spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent high transfer efficiency technology (any use of equivalent technology must be approved by the Iowa Department of Natural Resources).
- All spray-gun cleaning must be done with either non-HAP gun cleaning solvents, 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.
- Each owner or operator of an affected spray painting source must certify that all workers performing painting<sup>4</sup> must be certified that they have received training on proper spray application, spray equipment setup, and spray equipment maintenance.
  1. **Existing Sources:** all personnel trained and certified no later than **July 25, 2011, or 180 days after hiring**, whichever is later.
  2. **New Sources:** all personnel trained and certified no later than **January 20, 2009, 180 days after startup, or 180 days after hiring**, whichever is later.

**At a minimum, the training program must include the following:**

- List of current personnel that are required to be trained.
- Hands-on or classroom instruction on: spray gun equipment selection, set up, and operation; spray techniques designed to improve transfer efficiency; routine spray booth maintenance and filter selection, installation and maintenance; and environmental compliance with respect to this rule.
- Description of methods to demonstrate, document, and provide certification of successful training.
- Training and certification is valid for a maximum of 5 years. Refresher training for re-certification must take place at least every five years.

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<sup>4</sup>These requirements do not apply to students of an accredited painting training program under supervision of instructor, or to operators of robotic or automated painting operations.

- Records of training certification must be kept.

## **RECORD KEEPING AND REPORTING REQUIREMENTS**

In addition to the required initial notification and notification of compliance status (see general 6X NESHAP fact sheet), facilities with this industrial process that have the potential to emit a MFHAP or use materials that contain a MFHAP must also comply with the reporting and recordkeeping requirements below.

### **Annual Certification and Compliance Reports**

- Submit** no later than **January 31 of each year**.
  1. Cover the period from January 1 (or day after compliance date) to December 31 of the previous year.
- Report** should include the following information:
  1. Facility's name and address.
  2. Statement by responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
  3. Date of report and of beginning and ending dates of reporting period.These reports must be kept in a readily-accessible location for inspector review.

### **Record Keeping**

- The following records must be maintained in a form suitable and readily available for expeditious review.
  1. Copies of all notifications and reports, and supporting documentation.
  2. Records of applicability determinations.
  3. Spray paint booth filter records or water curtain control efficiency tests.
  4. Spray paint delivery system efficiency records to document the type of spray system.
  5. Spray paint employee training records.
  6. Copy of the manufacturer's instructions for equipment used for compliance.Records must be maintained for five years. The first two years of records must be maintained on-site. Older records may be maintained off site.

Please refer to the full rule text of [40 CFR Part 63, Subpart XXXXXX](#) to determine all applicable equipment requirements, management practices, monitoring requirements, recordkeeping requirements and reporting requirements necessary to be in compliance with this rule. Additional information is available at [DNR Air Toxic Page](#).

**For more information or questions please contact**  
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**Nine Metal Fabrication and Finishing Source Categories**  
**40 Code of Federal Regulations (CFR) Part 63, Subpart XXXXXX (6X NESHAP)**  
**Summary of Requirements: Industrial Process – Welding**

Welding is defined as a process which joins two metal parts by melting the parts at the joint and filling the space with molten metal. The following requirements shall be followed only if the facility's **welding** operations have the potential to emit a **MFHAP** or use materials that contain a **MFHAP**.

**REQUIRED MANAGEMENT PRACTICES**

- Operate all equipment associated with operations (including control equipment) according to the manufacturer's instructions.
- While maintaining the required welding quality, reduce emissions of MFHAP by implementing **one or more** of the following management practices:
  1. Use welding processes with reduced fume generation capabilities (e.g. gas metal arc welding (GMAW) or metal inert gas (MIG)).
  2. Use welding process variations that can reduce fume generation rates (e.g. pulse current GMAW).
  3. Use welding filler materials, shielding gases, carrier gases, or other process materials capable of reducing fume generation.
  4. Optimize welding process variables (e.g. electrode diameter, voltage, amperage, welding angle, etc).
  5. Use a welding fume capture and control system.
- Perform visual determinations of welding fugitive emissions if 2,000 lbs/year or more of welding rod and wire containing MFHAP are used (calculated on a rolling 12-month basis).

**MONITORING REQUIREMENTS**

Perform visual determinations of welding fugitive emissions if 2,000 lbs/year or more of welding rod and wire containing MFHAP are used. Visual determinations of welding fugitive emissions shall take place at the primary vent, stack, exit, or opening from the building containing the operations.

Visual determinations for welding operations shall take place using EPA Method 22 while the source is operating under normal conditions. According to procedures of EPA Method 22 of 40 CFR part 60, the reading must last at least fifteen (15) minutes. Follow the schedule shown in Figure 1.

For welding operations, using EPA Method 22, fugitive emissions are considered detected if they are visible for more than six (6) minutes in any fifteen (15) minute period. If fugitive emissions are detected, perform corrective actions and follow-up tests. Report emissions, actions taken and follow up inspections in annual certification and compliance report.

If fugitive emissions are detected more than once in a 12-month period, a visual determination of opacity, using EPA Method 9 shall be performed according to the schedule shown in Figure 2. Method 9 testing must be done within 24 hours from the time the Method 22 reading detected visible emissions. Method 9 testing shall be done while the source is operating under normal conditions. The duration of the Method 9 test shall be at least thirty minutes. Follow the schedule shown in Figure 2.

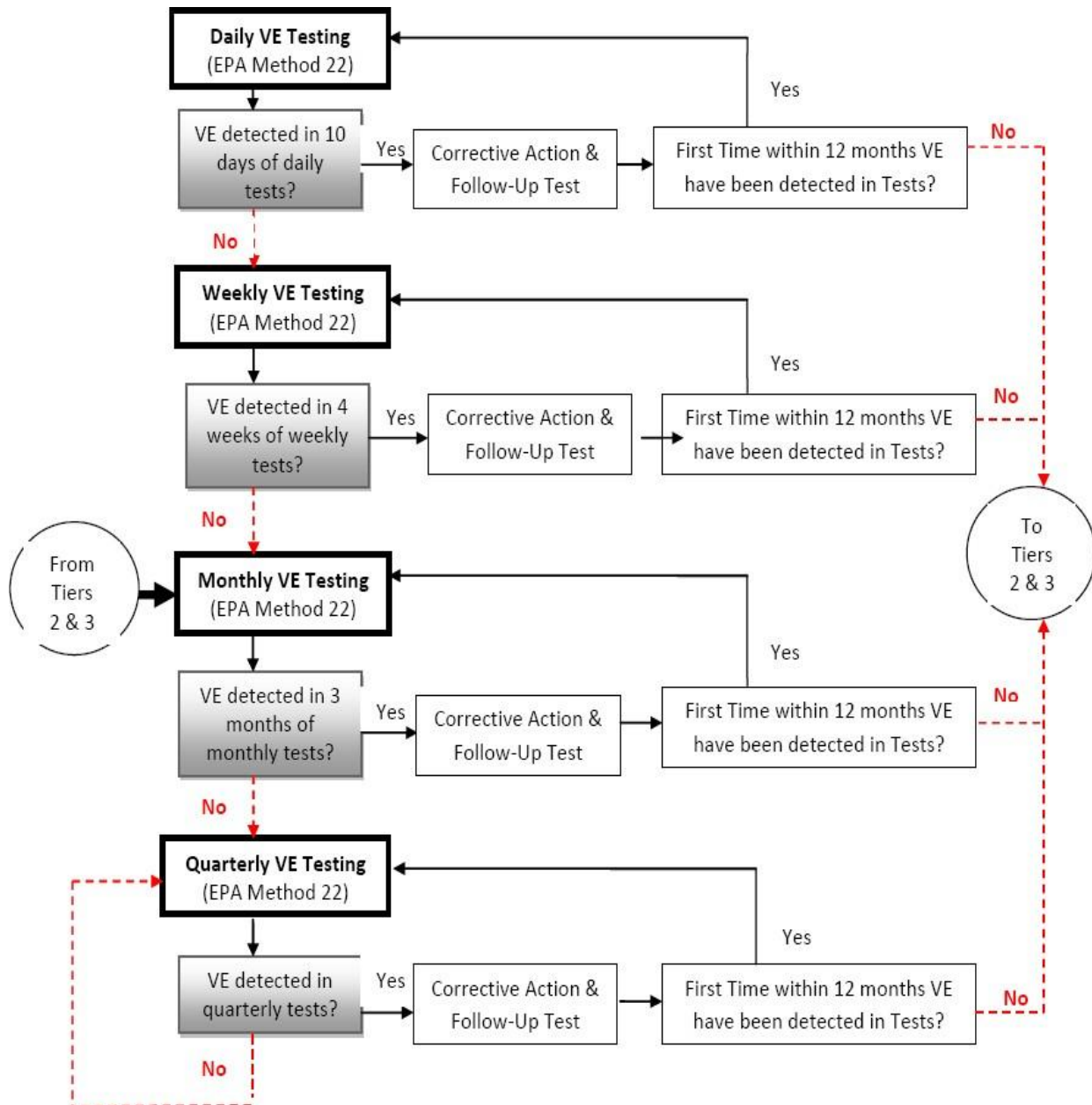
For welding operations, under EPA Method 9, emissions opacity is determined using the 6-minute average of opacity readings taken every 15 seconds for 30 minutes. Report emissions, actions taken and follow up inspections in annual certification and compliance report.

- Opacity less or equal to 20% as a six-minute average, but greater than 0%:
  1. Perform corrective actions, follow-up inspections and
  2. Evaluate operation and effectiveness of management practices.
- Opacities exceeding 20% as a six-minute average:
  1. Prepare and implement a Site-Specific Welding Emissions Management Plan,
  2. Perform visual determinations of opacity using EPA Method 9 and maintain records of visual determinations.

☑ **Site-Specific Welding Emissions Management Plan** should be updated annually, and contain the following information:

1. Company name and address;
2. List and description of welding operations;
3. Description of current management practices and fume control methods;
4. Description of proposed management practices and fume control methods with date of implementation; and
5. Copies of previous plans. The plans must be maintained on-site in a readily-accessible location for an inspector.

If after two consecutive months of using Method 9 there are no opacity readings higher than 20%, it is acceptable to go back to Method 22 (start inspecting monthly). Follow the schedule in Figure 1.



**Figure 1. Tier 1 – Visible Emissions Testing for Welding Operations; EPA Method 22**

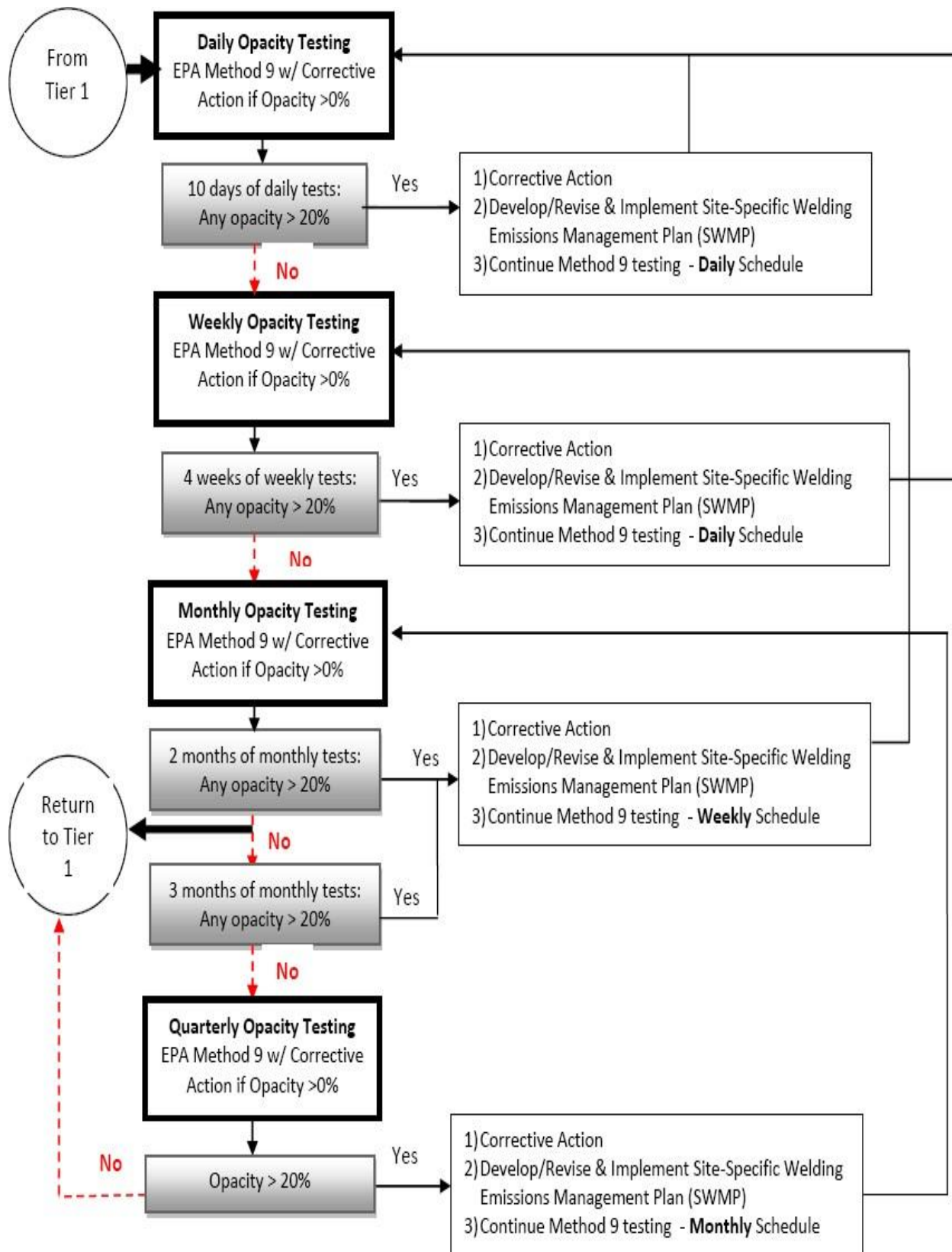


Figure 2. Tier 2 & 3 – Visible Emissions Testing for Welding Operation; EPA Method 9

#### RECORD KEEPING AND REPORTING REQUIREMENTS

In addition to the required initial notification and notification of compliance status (see general 6X NESHAP fact sheet), facilities with this industrial process that have the potential to emit MFHAP or use materials that contain MFHAP must also comply with the reporting and recordkeeping requirements below.

## Annual Certification and Compliance Reports

- ☑ **Submit** no later than **January 31<sup>st</sup> of each year**.
  1. Cover the period from January 1<sup>st</sup> (or day after compliance date) to December 31<sup>st</sup> of the previous year.
- ☑ **Report** should include the following information:
  1. Facility's name and address.
  2. Statement by responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
  3. Date of report and of beginning and ending dates of reporting period.
  4. Report of visual determinations of fugitive emissions (EPA Method 22).
  5. Report of visual determinations of emissions opacity (EPA Method 9).
  6. Reports of any exceedances (opacity >20%) which occurred during the year.
  7. Reports related to Site-Specific Welding Emissions Management Plan. These reports must be kept in a readily-accessible location for inspector review.

## Record Keeping

- ☑ The following records must be maintained in a form suitable and readily available for expeditious review.
  1. Copies of all notifications and reports, and supporting documentation.
  2. Records of applicability determinations.
  3. Records of welding rod and wire usage, if trying to show that less than 2000 pounds of welding rod and wire containing a MFHAP is used per year. Records shall be maintained on a rolling 12-month basis.
  4. Records associated with visual determinations of fugitive emissions (EPA Method 22).
  5. Records associated with visual determinations of emissions opacity (EPA Method 9).
  6. Manufacturer's specifications for control devices.
  7. Records associated with visual determinations of emissions opacity performed during development or revision of a site-specific welding emissions management plan.
  8. Copy of any site-specific welding emissions management plan.
  9. Copy of the manufacturer's instructions for equipment used for compliance.

Records must be maintained for five years. The first two years of records must be maintained on-site. Older records may be maintained off site.

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