



IOWA DEPARTMENT OF NATURAL RESOURCES

Air Quality News

Environmental Services

Air Toxics Update: Reinforced Plastics

EPA recently updated several federal regulations for hazardous air pollutants (also known as HAP or air toxics). EPA's actions address the Risk and Technology Review (RTR) required under the U.S. Clean Air Act.

This is the second in a series of articles covering EPA's updates to air toxics regulations (also known as National Emission Standards for Hazardous Air Pollutants or NESHAP). Find background on the NESHAP RTR requirements and a general overview of the recent changes in the [Air Toxics Update](#). In the following weeks, Iowa DNR will address changes to specific regulations affecting Iowa businesses.

Updates to the [NESHAP for Reinforced Plastics](#)

On March 20, 2020, EPA published final [NESHAP RTR amendments](#) for the reinforced plastics source category. The reinforced plastic composites production industry consists of facilities that manufacture reinforced and non-reinforced plastic composite products and the production of plastic molding compounds used in the production of plastic composite products. DNR estimates that 15 Iowa facilities are currently subject to this NESHAP.

The updated NESHAP (published in [40 Code of Federal Regulations Part 63 Subpart WWW](#)) includes, but is not limited to, the following changes:

- **Startup, Shutdown, and Malfunction (SSM):** EPA clarified that the emission standards are applicable during periods of startup, shutdown and malfunction, and determined that facilities in this source category can meet the applicable emission standards at all times, including periods of startup and shutdown. EPA also determined that for this source category, it is unlikely that a malfunction would result in a violation of the standards.
- **Electronic Reporting:** Owners and operations are required to submit electronic copies of performance test reports and performance evaluation reports and semiannual reports through the EPA's Central Data Exchange, using the Compliance and Emissions Data Reporting Interface. **Note:** Affected facilities must also comply with Iowa requirements for submitting reports, as specified in Iowa administrative rules or in air permits.

Affected facilities that commenced construction or reconstruction on or before May 17, 2019 have up to 180 days after the effective date of the final rule (March 20, 2020) to comply with the amendments. Affected sources that commence construction or reconstruction after May 17, 2019, must comply with all requirements no later than the effective date of the final rule or upon startup, whichever is later.

Implementation in Iowa

DNR plans to begin rulemaking to incorporate the updated standards—which will give DNR authority to administer the rules. In the interim, EPA will implement the NESHAP RTR

changes. DNR is available to answer questions about the new amendments and will work with EPA Region 7 to assist facilities.

DNR staff will review the changes and contact facilities which we know are impacted and have substantively different requirements in their permits from the updated NESHAP. However, an affected facility should carefully review the updated NESHAP to be aware of any new requirements and compliance dates. An affected facility must still comply with the NESHAP RTR requirements even if the requirements are not included in an Iowa air permit.

In the upcoming weeks, please keep an eye on your inbox for **Air Toxics** updates on other individual source categories.

If you have technical questions about the NESHAP changes, please contact Michael Hermsen (email: michael.hermsen@dnr.iowa.gov; phone: 515-725-9577). For general questions, please contact Christine Paulson (email: christine.paulson@dnr.iowa.gov; phone: 515-725-9510).

A note on Iowa DNR and COVID-19

The Iowa Department of Natural Resources is working with state and local officials to reduce the spread of COVID-19 and has transitioned employees to work remotely. DNR offices are closed to the public during this time and only available by appointment.

In another effort to further reduce the spread of COVID-19, the DNR is encouraging the use of the online services for submitting applications, payments and other daily tasks and interaction with DNR staff.

- [Full list of DNR's online services](#)
- [Up-to-date information on DNR services, facilities and events impacted by COVID-19](#)
- [Technical information for regulated businesses in regards to COVID-19](#)

We thank you for your patience and flexibility during this time. If you need to contact DNR staff you can reach them by email or phone or by calling 515-725-8200

DNR's Air Quality News listserve is targeted to the regulated public and consultants to deliver timely regulatory news, program updates, and technical guidance to your email. If you have difficulty, please contact DNR's Wendy Walker at 515-725-9570.