



IOWA DEPARTMENT OF NATURAL RESOURCES

Air Quality News

Environmental Services

Air Toxics Update: Revisions to Source Categories

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 fifth 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 Source Categories

EPA finalized updates to the NESHAP in four source categories. EPA determined that risks from these source categories are acceptable and that no new cost-effective controls are available. EPA did not make any changes to the control requirements or emissions standards in these NESHAP.

Currently DNR estimates there are no affected facilities in these sources in Iowa. However, facilities should carefully review the updated federal standards to ensure they are not affected by changes in the following categories.

Surface Coating of Metal Cans and Surface Coating of Metal Coil

On Feb. 25, 2020, EPA published final [NESHAP amendments](#) for two related source categories: Surface Coating of Metal Cans and Surface Coating of Metal Coil. The Metal Can source category includes emissions from facilities engaged in the manufacture and surface coating of cans, can parts and decorative tins. This includes aerosol cans, two-piece food and beverage cans, two-piece food cans and three-piece cans. The Metal Coil source category includes emissions from facilities engaged in the coating of aluminum and steel coils (sheets), which are used by client companies to fabricate a large variety of end products such as buses, trailers, large appliances, metal buildings and construction materials.

Hydrochloric Acid Production

On April 15, 2020, EPA published final [NESHAP amendments](#) for Hydrochloric Acid (HCl) Production. HCl is used in a variety of industrial processes including: refining ore for the production of tin and tantalum, pickling and cleaning of metal products, electroplating, cleaning boilers and neutralizing chemically basic systems. It also includes manufacturing fertilizers, dyes, textiles and rubber; and preparing various food products.

Cellulose Products

On July 2, 2020, EPA published final [NESHAP amendments](#) for Cellulose Products Manufacturing. The cellulose product-manufacturing sector includes two major categories: the viscose processes source category and the cellulose ethers source category. Viscose processes include manufacturing cellulose food casing, rayon, cellophane and cellulosic sponges. The cellulose ethers source category includes manufacturing thickeners and

binders used in industrial, food and pharmaceutical products. Consumer products that contain cellulose ethers include toothpaste, shampoo and cosmetics.

Changes to SSM and Electronic Reporting

The updated standards for the four source categories include, but are not limited to, the following changes:

- **Startup, Shutdown and Malfunction (SSM):** EPA clarified that the emission standards apply at all times, including during periods of startup, shutdown and malfunction.
- **Electronic Reporting:** Owners and operators are required to submit electronic copies of performance test reports, performance evaluation reports and semiannual reports through the EPA's Central Data Exchange, using the Compliance and Emissions Data Reporting Interface (CEDRI). **Note:** Affected facilities must also comply with Iowa requirements for submitting reports, as specified in Iowa administrative rules or in air permits.

Compliance Deadlines

- *Surface Coating of Metal Cans and Surface Coating of Metal Coil:* Affected sources in both source categories that commenced construction or reconstruction on or before June 4, 2019, must comply with the new requirements by Aug. 24, 2020, with the exception of the electronic format for submitting semiannual compliance reports. Sources that commenced construction or reconstruction after June 4, 2019, were required to comply by the effective date of the standard (Feb. 25, 2020), or upon startup, whichever is later, with the exception of the electronic format for submitting semiannual compliance reports. For the electronic format for submitting semiannual compliance reports, all affected sources will have one year after the electronic reporting templates are available on CEDRI, or until Feb. 25, 2021, whichever is later.
- *Hydrochloric Acid Production:* Affected sources that commenced construction or reconstruction on or before Feb. 4, 2019, must comply with the new requirements by Oct. 12, 2020. Affected sources that commenced construction or reconstruction after Feb. 4, 2019, were required to comply by the effective date of the amendments (April 15, 2020) or upon startup, whichever is later.
- *Cellulose Products Manufacturing:* For sources that commenced construction or reconstruction on or before Sept. 9, 2019, the deadline to comply with the new requirements is Dec. 29, 2020. Affected sources that commenced construction or reconstruction after Sept. 9, 2019, were required to comply by the effective date of the amendments (July 2, 2020) or upon startup, whichever is later.

For more information:

- [Surface Coating of Metal Cans](#)
- [Surface Coating of Metal Coil](#)
- [Hydrochloric Acid Production](#)
- [Cellulose Products Manufacturing](#)

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 that 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 federal standards to be aware of any new requirements and compliance dates. An affected facility must still comply with the NESHAP requirements even if the requirements are not included in an Iowa air permit. (As noted above, DNR is not aware of any Iowa facilities currently affected by these NESHAP.)

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