

Nine Metal Fabrication and Finishing Source Categories 40 CFR Part 63, Subpart XXXXXX (6X NESHAP)

Summary of Requirements: Industrial Process – Dry Grinding and Polishing with Machines

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**.
 - Cover the period from January 1 (or day after compliance date) to December 31 of the previous year.
- Report should include the following information:
 - Facility's name and address.
 - Statement by responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
 - 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.
 - Copies of all notifications and reports, and supporting documentation.
 - Records of applicability determinations.
 - Manufacturer's specifications for control devices.
 - 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 (available at <http://www.epa.gov/ttn/atw/area/compilation.html>) 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 <http://www.iowadnr.gov/air/prof/NESHAP/>

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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