



Walter Wright, Jr.
wwright@mwlaw.com
(501) 688.8839

NESHAP for Surface Coating of Metal Cans/Coating - Residual Risk and Technology Reviews: U.S. Environmental Protection Agency Proposed Rule

06/06/2019

The United States Environmental Protection Agency (“EPA”) issued a June 4th proposed rule in regards to the:

National Emissions Standards for Hazardous Air Pollutants (NESHAP) for the Surface Coating of Metal Cans and Surface Coating of Metal Coil

See 84 Fed. Reg. 25904.

The proposed rule addresses the results of the residual risk and technology reviews (RTRs) that EPA must conduct pursuant to the relevant provisions of the Clean Air Act NESHAP provisions.

As to the NESHAP source categories to which the proposed rule applies, they are defined as:

- Surface Coating of Metal Cans
- Applies to the surface coating and related operations at each new, reconstructed, and existing affected source of Hazardous Air Pollutant (“HAP”) emissions at facilities that are major sources and engaged in the surface coating of metal cans and ends (including decorative tins) and metal crowns and closures
- Surface Coating of Metal Coil
- Applies to the collection of all coil coating lines at a facility and defines a coil coating line as the process for metal coil coating that includes the web unwind or feed station, a series of one or more coating stations, associated curing ovens, wet sections, and quench stations

By way of summary, the proposed rule determines that the risk due to emission of HAPs from the two service categories under the current standards are acceptable. The agency determines that the current NESHAP provide an ample margin of safety to protect public health. As a result, no revisions to the numerical emission limits based on these analyses are being proposed.

EPA is also proposing to amend provisions:

- Addressing emissions during periods of startup, shutdown, and malfunction
- Regarding electronic reporting of performance test results
- Regarding monitoring requirements

- Making miscellaneous clarifying and technical corrections

A copy of the Federal Register Notice can be downloaded [here](#).