

## Frequently Asked Questions

### What is a NESHAP?

A National Emission Standard for Hazardous Air Pollutants, or NESHAP, is a federal regulation that targets air emissions of hazardous air pollutants (HAP).

### What is an area source?

An area source is any facility that uses HAP and emits to the air less than 10 tons per year of any single HAP and less than 25 tons per year of all HAP.

*Note: There are separate NESHAP for major sources that produce or fabricate flexible polyurethane foam.*

### What chemicals are HAPs?

The Clean Air Act contains a list of 188 chemicals that are officially classified as HAP. Common HAP used by flexible polyurethane production and fabrication facilities are methylene chloride, TDI, and MDI.

*Note: This rule only addresses emissions of methylene chloride.*

The Flexible Polyurethane Foam Production and Fabrication NESHAP was published in the Federal Register on July 16, 2007 (72 FR 38864). The notice is available at [www.epa.gov/ttn/atw/area/fr16jy07.pdf](http://www.epa.gov/ttn/atw/area/fr16jy07.pdf)

## You can also contact your Regional EPA

### AIR TOXICS office at the following numbers:

Address	States	Website / Phone Number
Region 1 1 Congress Street, Suite 1100 Boston, MA 02114-2023	CT, MA, ME, NH, RI, VT	<a href="http://www.epa.gov/region1">www.epa.gov/region1</a> 888-372-7341 617-918-1650
Region 2 290 Broadway NY, NY 10007-1866	NJ, NY, PR	<a href="http://www.epa.gov/region2">www.epa.gov/region2</a> 212-637-4023
Region 3 1650 Arch Street Philadelphia, PA 19103-2029	DE, MD, PA, VA, WV, DC	<a href="http://www.epa.gov/region3">www.epa.gov/region3</a> 800-228-8711 215-814-2196
Region 4 Atlanta Federal Center 61 Forsyth Street, SW Atlanta, GA 30303-8960	FL, NC, SC, KY, TN, GA, AL, MS	<a href="http://www.epa.gov/region4">www.epa.gov/region4</a> 800-241-1754 404-562-9131
Region 5 77 West Jackson Blvd. Chicago, IL 60604-3507	IL, IN MI, WI MN, OH	<a href="http://www.epa.gov/region5">www.epa.gov/region5</a> 312-886-6812 312-353-6684 312-886-6798
Region 6 1445 Ross Avenue Suite 1200 Dallas, TX 75202-2733	AR, LA, NM, OK, TX	<a href="http://www.epa.gov/region6">www.epa.gov/region6</a> 800-887-6063* 214-665-7250 214-665-7224
Region 7 901 North Fifth Street Kansas City, KS 66101	IA, KS, MO, NE	<a href="http://www.epa.gov/region7">www.epa.gov/region7</a> 800-223-0425 913-551-7003
Region 8 1595 Wynkoop Street Denver, CO 80202-1129	CO, MT, ND, SD, UT, WY	<a href="http://www.epa.gov/region8">www.epa.gov/region8</a> 800-227-8917* 303-312-6460
Region 9 75 Hawthorne Street San Francisco, CA 94105	CA, AZ, HI, NV, GU, AS, MP	<a href="http://www.epa.gov/region9">www.epa.gov/region9</a> 415-947-8715
Region 10 1200 6th Avenue Suite 900, AWT-107 Seattle, WA 98101	AK, ID, WA, OR	<a href="http://www.epa.gov/region10">www.epa.gov/region10</a> 800-424-4372* 206-553-6220

\* For sources within the region only.

### For More Information

This brochure is a general guide only; review the rule for your specific requirements at:

<http://www.epa.gov/ttn/atw/area/arearules.html>

For more information on state requirements, please contact your state representatives at:

[http://www.epa.gov/ttn/atw/area/table\\_state\\_contacts.doc](http://www.epa.gov/ttn/atw/area/table_state_contacts.doc) or, <http://www.4cleanair.org/contactUsaLevel.asp>

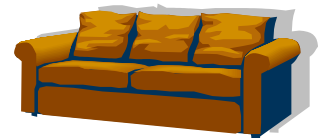


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[www.epa.gov/ttn/atw/area/arearules.html](http://www.epa.gov/ttn/atw/area/arearules.html)

Office of Air Quality Planning and Standards

## Summary of Regulations Controlling Air Emissions for the Flexible Polyurethane Foam Production and Fabrication Industry



## National Emission Standards for Hazardous Air Pollutants (NESHAP)

Subpart OOOOOO

# Flexible Polyurethane Foam Production and Fabrication Area Source NESHAP

On July 16, 2007, EPA finalized a regulation that affects all flexible polyurethane foam production and fabrication facilities that are area sources. This brochure is intended to provide basic information for foam producers and fabricators that may be subject to this rule.

## **Foam Fabrication**

**Methylene Chloride Use is PROHIBITED**

### **Requirements:**

- ⇒ The use of adhesives containing methylene chloride is prohibited.

### **Compliance Date:**

- ⇒ July 16, 2007.

### **Reporting and Recordkeeping:**

- ⇒ There are no reports required.
- ⇒ Keep a compliance certification dated no later than July 16, 2007 on file that certifies that you do not use adhesives containing methylene chloride (Facilities with loop slitters only).
- ⇒ Keep records to demonstrate you are not using adhesives containing methylene chloride (All facilities).

## **Slabstock Foam Production**

**Methylene Chloride NOT used as an ABA**

### **Requirements:**

- ⇒ Do not use methylene chloride as an ABA or otherwise.

### **Compliance Date:**

- ⇒ July 16, 2008.

### **Reporting and Recordkeeping:**

- ⇒ Notification of Compliance Status Report—Due January 12, 2009; certifying that you do not use methylene chloride as an ABA or otherwise.
- ⇒ Records to demonstrate you are not using methylene chloride as an ABA or otherwise.

## **Slabstock Foam Production**

**Methylene Chloride Used as an Auxiliary Blowing Agent (ABA)**

### **Requirements:**

- ⇒ Controls required for methylene chloride storage tanks.
- ⇒ Inspections and repairs required for pumps, valves, and other equipment in methylene chloride service.
- ⇒ Allowable methylene chloride usage as an ABA calculated based on grades of foam produced and production levels.
- ⇒ Facility-wide compliance option allows simplified compliance by monitoring methylene chloride usage at the storage tank(s).

### **Compliance Date:**

- ⇒ July 17, 2008.

### **Reporting and Recordkeeping:**

#### *Reports -*

- ⇒ Initial notification — Due November 13, 2007.
- ⇒ Precompliance Report—Due July 16, 2007.
- ⇒ Notification of Compliance Status Report—Due January 12, 2009.
- ⇒ Semiannual Reports—Due September 9, 2009 and every six months thereafter.
- ⇒ Annual Compliance Certifications.

#### *Records -*

- ⇒ Foam production
- ⇒ Polyol usage
- ⇒ Methylene chloride usage
- ⇒ Inspection and repairs
- ⇒ Tank levels (Facility-wide option).

## **Molded and Rebonded Foam Production**

**Methylene Chloride Use is PROHIBITED**

### **Requirements:**

Methylene chloride is prohibited from the following uses:

- ⇒ Equipment Cleaning
- ⇒ Mixhead Flushing
- ⇒ Mold Release Agent

### **Compliance Date:**

- ⇒ July 16, 2007.

### **Reporting and Recordkeeping:**

- ⇒ There are no reports required.
- ⇒ Keep a compliance certification dated no later than July 16, 2007 on file that certifies that you do not use equipment cleaners, mixhead flushing products, and mold release agents containing methylene chloride.
- ⇒ Records to demonstrate you are not using methylene chloride products.