

Note: While these questions and answers constitute the best available information at this time, the EPA recommends that you consult your State or local air pollution control agency for any final determinations. State and local agencies may implement provisions that are more stringent than those contained in the NESHAP.

Aerospace NESHAP Q&A's

(3/2001)

NOTE: Please note that this question was previously identified as Question #38 in the Aerospace compiled Q&A document. We have modified the answer slightly by removing the example that includes "flop-top or squirt bottles with small openings." We originally added this as an example after receiving a question about very small, squirt-type containers used in limited quantities and their need to be sealed at all times when not in use. Based on the information received at that time, EPA included the containers as an example. Recently however, EPA has received several questions by State and Local regulatory agencies as to the intent of this example, especially at facilities where very large quantities of these types of containers are used. It continues to be EPA's position that facilities should coordinate with the State and local regulatory agency when determining if containers of this type are classified as closed. To prevent further confusion, we have eliminated the example.

Q: What is the definition of "closed container" in the cleaning provisions?

A: The rule does not provide a definition for "closed container," but does say (§63.744(a)(1)) that bags and containers should be kept closed at all times except when depositing or removing materials from the container. Also, bags or containers should be designed so as to contain the vapors of the cleaning solvent. This is not interpreted to mean that the container should be tested to be emission-free. Common sense would indicate that a close-fitting lid or closure device should be on the container, and that the container should be kept shut when not in use. For example, if a lid is purposely propped open, that would not be considered a closed container, however, if a lid inadvertently has a small gap in the "closed" position, that would constitute a closed container. Again this is subject to the permitting authorities discretion, and it would be best to discuss any possible concerns with them.