

WOOL FIBERGLASS MANUFACTURING

Inspections Checklists

These checklists can be used to determine compliance with the Wool Fiberglass NNN MACT standards. A separate checklist section has been prepared for each of the following compliance categories:

Section I: REPORTING

Section II: STARTUP, SHUTDOWN AND MALFUNCTION PLANS (SSMPs)

Section III: RECORDKEEPING

Section IV: MONITORING

Section V: OPERATING

In addition to covering the provisions under Subpart NNN, the checklists also address the Part 63 Subpart A General Provision requirements. Each of the checklist questions is followed by a detailed citation of the requirement. Where a specific requirement is contained in more than one regulation, (e.g., required under both Subparts A and NNN) all applicable regulations are cited.

Checklists related to REPORTING, SSMPs and most of the RECORDKEEPING requirements are generally applicable to all MACT categories. Those dealing with OPERATING and MONITORING requirements are unique to the Wool Fiberglass MACT. It should be noted that though checklist questions in each of the sections are not duplicated in any of the other sections, there are some cross cutting requirements that may appear in more than one section. For example, the SSMPs section also includes questions on reporting and recordkeeping applicable to the SSMPs requirements.

Since completion of all the checklist may be a tedious and lengthy process, it is strongly recommended that as much preparatory work as possible be done before the on-site inspection. Compliance with reporting requirements should be determined by reviewing facility reports located at the appropriate regulatory agency offices and completing the REPORTING checklist. If, for any reason, the inspector is not able to locate certain applicable reports prior to the inspection, records of the reports should be made available during the on-site inspection.

Compliance with OPERATING and MONITORING requirements depends to a large extent on stack testing results and special operating conditions imposed on the facility based on those results. It would therefore behoove the inspector to review the stack test reports and become familiar with its contents before conducting the inspection.

It should be noted that it is not essential that the checklists be completed in the order presented. However, that order of completing the checklists would make the most sense for necessary pre-review of pertinent information and the follow-up on-site

inspection. (Note: for a more efficient on-site inspection the OPERATING and MONITORING sections are reversed from the order presented in the regulations.)

Before proceeding with the completion of the checklists, the inspector should ascertain that the wool fiberglass standards indeed apply to a particular facility by answering the questions to the following "Applicability" criteria.

APPLICABILITY

The answers to questions A, B and C must all be "yes" for the facility to be subject to the wool fiberglass NESHAP, Subpart NNN.

A.	Does the facility produce wool fiberglass?	Yes [] No []
B.	Is the facility a major HAP source or located at a facility that is a major HAP source?	Yes [] No []
C.	Are any of the following new or existing sources located at the facility? 1. Glass melting furnace 2. Rotary spin wool fiberglass line 3. Flame attenuation wool fiberglass line	Yes [] No []

Comments: _____

