Flowchart for Determining Your Requirements Under The Plating and Polishing Area Source NESHAP (Subpart WWWWW)



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	<u>www.epa.gov/region1</u> (888) 372-7341 (617) 918-1650
Region 2 290 Broadway New York, NY 10007-1866	NJ, NY, PR, VI	<u>www.epa.gov/region2</u> (212) 637-4023
Region 3 1650 Arch Street Philadelphia, PA 19103-2029	DE, MD, PA, VA, WV, DC	<u>www.epa.gov/region3</u> (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	<u>www.epa.gov/region4</u> (404) 562-9131 (800) 241-1754
Region 5 77 West Jackson Blvd. Chicago, IL 60604-3507	IL, IN, MI, WI, MN, OH	<u>www.epa.gov/region5</u> (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	www.epa.gov/region6 (800) 887-6063 (214) 665-7250 (214) 665-7224
Region 7 901 North Fifth Street Kansas City, KS 66101	IA, KS, MO, NE	<u>www.epa.gov/region7</u> (800) 223-0425 (913) 551-7003
Region 8 1595 Wynkoop St. Denver, CO 80202-1129	CO, MT, ND, SD, UT, WY	<u>www.epa.gov/region8</u> (800) 227-8917* (303) 312-6460
Region 9 75 Hawthorne Street San Francisco, CA 94105	CA, AZ, HI, NV, GU, AS, MP	<u>www.epa.gov/region9</u> (415) 744-1197
Region 10 1200 6 th Ave. Suite 900, AWT-107 Seattle, WA 98101	AK, ID WA, OR	<u>www.epa.gov/region10</u> (800) 424-4372* (206) 553-6220

* For sources within the Region only.

For More Information

This brochure is a general guide only. You may 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 representative found at the following link: http://www.epa.gov/ttn/atw/area/table_state_contacts.doc or, http://www.4cleanair.org/contactUsaLevel.asp Office of Air Quality Planning & Standards

♣ EPA

Summary of Regulations Controlling Air Emissions from

PLATING AND POLISHING

OPERATIONS

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS NESHAP (SUBPART WWWWW)

FINAL RULE



PLATING AND POLISHING INDUSTRY (SUBPART WWWWW)

To Whom Does This Rule Apply?

- Facilities that are area sources^a of hazardous pollutants (HAP)
- Tanks / processes that contain or use any compounds of cadmium (Cd), chromium (Cr), manganese (Mn), nickel (Ni) or lead (Pb), in the following processes:
 - Non-cyanide electroplating and electroforming (pH<12), and electropolishing
 - o Cyanide plating (pH ≥12)
 - $_{\rm O}$ Electroless plating
 - \circ Other coating, such as chromium conversion coating
 - $_{\rm O}$ Thermal spraying
 - $_{\odot}$ Dry mechanical polishing

What Am I Required to Do?

Specific Requirements:

- Non-cyanide electroplating and electroforming (pH<12), and electropolishing
 - Use wetting agent/fume suppressant (WAFS), control device, or tank cover
- Flash or short-term electroplating
 - Limit plating time to 3 min/hr or 1 hr/day, or use tank covers
- Other coating and plating; temporary thermal spraying, and all above electrolytic processes:
 Management practices
- Dry mechanical polishing and permanent thermal spraying
 - $\circ~$ Exhaust emissions to a control device

Management Practices: as applicable and practicable

• Minimize bath agitation when removing any parts processed in the tank except when necessary to meet part quality requirements.

- Maximize the draining of bath solution back into the tank by extending drip time when removing parts from the tank.
- Optimize the design of barrels, racks and parts to minimize dragout of bath solution.
- Use tank covers whenever possible, if already owned and available at the facility.
- Minimize or reduce heating of process tanks, except when doing so would interrupt production or adversely affect part quality.
- Perform regular repair, maintenance and preventive maintenance of racks, barrels, and other equipment associated with affected sources.
- Minimize bath contamination using practices such as: the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated.
- Maintain quality control of chemicals and other bath ingredient concentrations in the tanks.
- Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns.
- Minimize spills and overflow of tanks.
- Use squeegee rolls in continuous or reel-toreel plating tanks.
- Perform regular inspections to identify leaks and other opportunities for pollution prevention.

What Is the Compliance Date?

- Existing Sources: by July 1, 2010
- New Sources: upon start-up

What Reports and Records Are Required?

- Submit the Initial Notification and the Notification of Compliance Status.
- Prepare annual Certification of Compliance Report and Report of Deviations by January 31^{st.} Submit both reports by January 31st of the following year if any deviations occurred during the previous year.

Maintain the following records, as applicable:

- Records that demonstrate compliance with management practices.
- For cyanide tanks, the one-time pH measurement value.
- For non-cyanide tanks, amount and frequency of WAFS additions, if applicable.
- For short-term or flash electroplating tanks, the daily plating time.
- For batch electroplating tanks using covers as a control option, the time the tank is operated with cover in place.
- For continuous electroplating tanks, amount of tank surface covered and time tank is operated with cover in place.
- Operating manuals for all required control systems.
- All required notifications and reports, with supporting documentation.
- Records should be kept in a form suitable and readily available for review.

What are Reporting Dates?

- Initial Notification
 - Existing Sources: 10/29/2008
 - New Sources: upon start-up
- Notification of Compliance Status
 - Existing Sources: 07/01/2010
 - o New Sources: upon start-up

Where Can I Get More Information?

- For more details, see these web links: <u>http://www.epa.gov/ttn/atw/area/regional_contacts.pdf</u> <u>http://www.smallbiz-enviroweb.org/sba/sbap.html</u>
- The rule itself can be found at this link: <u>http://www.epa.gov/ttn/atw/area/arearules.html</u>

^a An area source is a facility that emits or has the potential to emit in the absence of controls, less than 10 tons per year (tpy) of individual HAP and 25 tpy of combined HAP.