

Plating and Polishing Operations
40 Code of Federal Regulations (CFR) Part 63 Subpart WWWW (6W)
Summary of Requirements: Process – Thermal Spraying

The following requirements shall be followed in addition to the general summary of requirements, if the facility owns or operates affected **THERMAL SPRAYING EQUIPMENT** that applies one or more **PPMHAP**.

Thermal spraying (a.k.a. metal spraying or flame spraying) operations are divided into two categories: permanent and temporary. A temporary thermal spraying operation is defined as a thermal spraying operation that lasts no more than 1 hour in duration during any one day and is conducted in situ. Thermal spraying that is conducted in a dedicated thermal spray booth or structure is not considered to be temporary.

MANAGEMENT PRACTICES

Permanent Thermal Spraying Operation:

- Operate a capture system for PM emissions from the thermal spraying operation and exhaust them to a fabric filter, or HEPA filter.
- PM emissions can be exhausted to a water curtain ONLY if the thermal spraying operation is existing.
- Operate all capture and control devices according to the manufacturer's specifications and operating instructions; and
- Keep the manufacturer's specifications and operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

Temporary Thermal Spraying Operation:

- Document the amount of time the thermal spraying occurs each day, and where it is conducted.
- Perform regular repair, maintenance, and preventive maintenance of equipment associated with affected sources;
- Perform general good housekeeping;
- Perform regular inspections to identify opportunities for pollution prevention.

COMPLIANCE DEMONSTRATION - Permanent Thermal Spraying Operation

Initial Compliance:

- Demonstrate initial compliance with the following requirements:
 1. Comply with the management practices;
 2. Submit Notification of Compliance Status stating that you have installed and are operating the control system according to the manufacturer's specification and instructions;
 3. Follow the manufacturer's specifications and operating instructions at all times.

Continuous Compliance:

- Comply with the management practices;
- Operate and maintain the control system according to the manufacturer's specification and instructions;
- Take immediate corrective action following any malfunction of the control equipment or capture system;
- Prepare an annual compliance report and certify that manufacturer's specifications and instructions have been followed;
- Record results of all control system inspections, deviations from proper operation, and corrective actions;

COMPLIANCE DEMONSTRATION - Temporary Thermal Spraying Operation

Initial Compliance:

- Demonstrate initial compliance with the following requirements:
 1. Comply with the management practices;
 2. Submit Notification of Compliance Status stating that you have implemented the above management practices.

Continuous Compliance:

- Implement the management practices during all times the process is in operation;
- Prepare an annual compliance report and certify annually that you have implemented the management practices.

Please refer to the full rule text of [40 CFR Part 63, Subpart WWWW](#) to determine all applicable equipment requirements, management practices, monitoring requirements, recordkeeping requirements and reporting requirements necessary to be in compliance with this rule.

Additional information is available at [Iowa DNR Air Toxics Page](#)

For more information or questions please contact:

Iowa Department of Natural Resources: **1-877-AIR-IOWA**

Iowa Waste Reduction Center: **1-800-422-3109**

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