Plating and Polishing Operations
40 Code of Federal Regulations (CFR) Part 63 Subpart WWWWWW (6W)

Summary of Requirements: Dry Mechanical Polishing

The following requirements shall be followed in addition to the general summary of requirements, if the facility owns or operates affected new or existing DRY MECHANICAL POLISHING EQUIPMENT that has the potential to emit one or more PPMHAP.

Dry Mechanical Polishing is defined as a process used for removing defects from and smoothing the surface of finished metals and formed products after plating with any of the PPMHAP using hard-faced abrasive wheels or belts and where no liquids or fluids are used to trap the removed metal particles.

MANAGEMENT PRACTICES

☑ Operate a capture system for PM emissions from the polishing operation and exhaust them to a cartridge, fabric filter or High Efficiency Particulate Air (HEPA) filter according to the following guidelines:
  ☑ Operate all capture and control devices according to the manufacturer’s specifications and operating instructions.
  ☑ 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.

COMPLIANCE DEMONSTRATION

Initial Compliance

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

Continuous Compliance

☑ Demonstrate continuous compliance with the following requirements:
  ☑ Comply with the management practices;
  ☑ Operate and maintain air pollution control equipment
  ☑ 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.

Please refer to the full rule text of 40 CFR Part 63, Subpart WWWWWW (available at http://www.epa.gov/ttn/atw/area/compilation.html) 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 http://www.iowadnr.gov/air/prof/NESHAP/

For more information or questions please contact:
Iowa Department of Natural Resources: 1-877-AIR-IOWA
Iowa Waste Reduction Center: 1-800-422-3109

The publication of this document has been funded in part by the Iowa Department of Natural Resources. This document is intended solely as guidance, cannot be used to bind the Iowa Department of Natural Resources and is not a substitute for reading applicable statutes and regulations.

August 2009