

Plating and Polishing Operations

40 Code of Federal Regulations (CFR) Part 63 Subpart WWWWWW (6W)

General Summary of Requirements

The *Plating and Polishing Operations - Area Source*^a NESHAP^b (6W NESHAP) regulations apply to plating and polishing facilities that meet **all** of the following criteria:

- Facilities that are engaged in one or more of the following operations:
 - (1) Electroplating other than chromium electroplating;
 - (2) Electroless or non-electrolytic plating;
 - (3) Other non-electrolytic metal coating processes such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing and manganese phosphate coating, and thermal spraying;
 - (4) Dry mechanical polishing of finished metal and formed products after plating;
 - (5) Electroforming, or
 - (6) Electropolishing
- Facilities that
 - have the **potential to emit a plating and polishing metal HAP (PPMHAP)**. A PPMHAP includes **cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn), and nickel (Ni)**, or include any of these metals in the elemental form with the exception of lead.

Or
 - use materials that contain a PPMHAP in an electroplating or electroforming tank**. These are materials that contain **cadmium (Cd), chromium (Cr), lead (Pb), and nickel (Ni)** in amounts **greater than or equal to 0.1 percent by weight of the metal**, and materials that contain **manganese (Mn)** in amounts **greater than or equal to 1.0 percent by weight of the metal**.
- Facilities that have one of the following processes:
 - (1) **Tanks** that contain a PPMHAP, including:
 - Non-cyanide electroplating, electroforming, or electropolishing tanks with a pH of less than 12;
 - Short-term or “flash” electroplating tanks used for less than 1 cumulative hour per day or 3 cumulative minutes per hour;
 - Tanks used both for short-term electroplating and for electrolytic processing for more than 1 cumulative hour per day or 3 cumulative minutes per hour;
 - Electroplating using cyanide in plating bath with a pH greater than or equal to 12;
 - Other non-electrolytic metal coating operations
 - (2) **Permanent or Temporary Thermal Spraying**; or
 - (3) **Dry Mechanical Polishing**

NOTE: The specific standards and management practices for each process covered under the 6W NESHAP are described on individual, supplemental fact sheets.

- Sources that are **EXEMPT** from the 6W NESHAP include:
 - (1) Process units subject to 40 CFR part 63, Subpart N – National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks*;
 - (2) Research and development process units as defined in §63.11511;
 - (3) Process units used only for educational purposes;
 - (4) Thermal spraying conducted to repair surfaces;
 - (5) Dry mechanical polishing conducted to restore the original finish.

***NOTE: Facilities may be subject to other area source NESHAP, such as the NESHAP for Metal Fabrication and Finishing (40 CFR Part 63 Subpart XXXXXX), and may also be subject to 6W.**

^a An Area Source is a source of Hazardous Air Pollutants (HAPs) that is not a major source. An area source of HAPs emits or has the potential to emit less than 10 tons of any single HAP and less than 25 tons of any combination of HAPs per 12 months.

^b NESHAP – National Emissions Standards for Hazardous Air Pollutants.

AFFECTED SOURCE AND COMPLIANCE DATES

- New** – commenced construction **after** March 14, 2008
 - Startup date between March 14, 2008 and July 1, 2008; 6W NESHAP compliance no later than July 1, 2008.
 - Startup date on or after July 2, 2008; 6W NESHAP compliance upon initial startup.
- Existing** – commenced construction **on** or **before** March 14, 2008
 - Startup date before March 14, 2008; 6W NESHAP compliance by July 1, 2010.

GENERAL NOTIFICATION AND REPORTING REQUIREMENTS

Facilities subject to the 6W NESHAP must submit the following notifications to the Iowa Department of Natural Resources (DNR Air Quality Bureau, attn: NESHAP Coordinator, 7900 Hickman Road, Suite 1, Windsor Heights, Iowa, 50324).

Initial Notification:

- Sources that **start up after July 1, 2008** submit no later than 120 days after start up.*
- Sources that **started up on or before July 1, 2008**, submit by October 29, 2008.*
**The DNR will accept notifications after the due date and encourages facilities to submit past-due notifications as soon as possible.*
- Must include the following information:
 - Name, address, phone number, and e-mail address of the owner/operator.
 - Address of the affected source.
 - Statement indicating the facility is subject to this standard (40 CFR Part 63, Subpart WWWW).
 - Brief description of facility operations.
 - Emission unit description, I.D. number and list of HAP emitted from or used on the equipment.
 - Description of the compliance method for each affected source. (refer to fact sheets for specific processes for examples).

Notification of Compliance Status:

- Existing Sources** submit no later than **July 1, 2010**.
- New Sources:**
 - Startup date between March 14, 2008 -and July 1, 2008; submit no later than July 1, 2008.*
 - Startup date on or after July 2, 2008; submit upon initial startup.***The DNR will accept notifications after the due date and encourages facilities to submit past-due notifications as soon as possible.*
- Must include the following information:
 - Company name and address.
 - A statement by a responsible official with that official's name, title, address, phone number, e-mail address , and signature certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all relevant standards and requirements of this rule.
 - List of affected sources and the PPMHAP used in or emitted by those sources
 - Statement that applicable management practices are implemented.
 - Methods used to comply with the applicable management practices and equipment standards.
 - Description of the capture and emissions control systems used to comply with any equipment standards.

Annual Certification of Compliance

NOTE: Refer to the supplemental fact sheets for the specific processes for additional information that must be included in the Annual Certification of Compliance.

- Prepared no later than **January 31 of each year**.
 - Cover the period from January 1 (or day after compliance date) to December 31 of the previous year.
 - Must be kept in a readily-accessible location for inspector review.
- If a deviation from a compliance requirement occurred during the year, a copy of the report must be submitted to the Iowa DNR.
- Report should include the following information:
 - Facility's name and address.
 - Statement by responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
 - Date of report and of beginning and ending dates of reporting period.
 - A statement that you have followed the specific required control requirements for each affected 6W source.

Deviation Reports

- Cover the period from January 1 (or day after compliance date) to December 31 of the previous year.
- Submit to Iowa DNR with postmark date of **January 31 of each year**.
- Report should include the following information:
 - Any deviations occurred during the previous year and the corrective action taken.

Record Keeping

- The following records must be maintained in a form suitable and readily available for expeditious review.
 - Copies of all notifications and reports, and supporting documentation.
 - Records that show you meet the management practices.
 - The occurrence and duration of each startup, shutdown and malfunction of the operation.
 - The occurrence and duration of each malfunction of the required air pollution control and monitoring equipment.
 - All required maintenance performed on air pollution control and monitoring equipment.

Records must be maintained for five years. The first two years of records must be maintained on-site. Older records may be maintained off site.

Please refer to the full rule text of 40 CFR Part 63, Subpart WWWW (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**

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