

Plating and Polishing Operations

40 Code of Federal Regulations (CFR) Part 63 Subpart WWWWWW (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:
 - 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;
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 - 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:
 - Comply with the management practices;
 - 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 (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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