



Air Pollution Control Board

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COMPLIANCE ADVISORY

NOTICE OF ADOPTION OF NESHAP SUBPART WWWW – PLATING AND POLISHING OPERATIONS AT AREA SOURCES

The intent of this advisory is to notify potentially affected facilities of National Emission Standards for Hazardous Air Pollutants WWWW (NESHAP 6W) – Plating and Polishing Operations at Area Sources. Potentially affected facilities are area sources with one or more processes listed below that contain or use any compounds of cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn), or nickel (Ni).

Processes at area sources subject to NESHAP 6W

- ♦ Non-cyanide electroplating, electroforming, and electropolishing (tank pH<12);
- ♦ Cyanide plating (pH≥12);
- ♦ Electroless or non-electrolytic plating;
- ♦ Chromate conversion coating, nickel acetate sealing, or other metal coating processes;
- ♦ Dry mechanical polishing;
- ♦ Thermal spraying.

An area source is any facility that emits less than 10 tons per year of individual hazardous air pollutants (HAP) or 25 tons per year of combined HAP.

NESHAP 6W does not apply to:

- ♦ Process units subject to National Emission Standards Subpart N: Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks.
- ♦ Research and development process units.
- ♦ Process units that are used strictly for educational purposes.
- ♦ Thermal spraying conducted to repair surfaces.
- ♦ Dry mechanical polishing conducted to restore the original finish to a surface.
- ♦ Processes utilizing materials that contain Cd, Cr, Pb, or Ni in amounts less than 0.1 percent by weight, or that contain Mn in amounts less than 1.0 percent by weight.

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Basic requirements of NESHAP 6W

Process-specific requirements:

Non-cyanide electroplating, electroforming, and electropolishing:

- ♦ Use a wetting agent/fume suppressant, emission control device, or tank cover 95% of plating time.

Flash or short-term electroplating:

- ♦ Limit plating time to 3 min/hr or 1 hr/day, or use tank covers 95% of plating time.

Dry mechanical polishing:

- ♦ Capture and exhaust emissions to a compliant control device.

Permanent thermal spraying operations:

- ♦ Capture and exhaust emissions to a compliant control device.

General requirements (apply to all operations subject to NESHAP 6W):

The following management practices should be implemented as applicable and practicable:

- ♦ Minimize bath agitation when removing parts.
- ♦ Maximize draining of bath solution back into the tank.
- ♦ Minimize drag out of bath solution.
- ♦ Use tank covers if already owned and available at the facility.
- ♦ Minimize or reduce heating of tanks.
- ♦ Perform regular repair, maintenance, and preventative maintenance of equipment.
- ♦ Minimize bath contamination.
- ♦ Maintain quality control of chemicals and other bath ingredient concentrations.
- ♦ Perform general good housekeeping.
- ♦ Minimize spills and overflow of tanks.
- ♦ Use squeegee rolls in continuous or reel-to-reel plating tanks.
- ♦ Perform regular inspections to identify leaks and opportunities for pollution prevention.

Maintain records of reports and/or forms submitted to the San Diego Air Pollution Control District (District) and records to demonstrate continuous compliance for a minimum of 5 years.

Reporting and Compliance Dates of NESHAP 6W

The following reporting forms must be sent to the District:

- ♦ Notification of Compliance Status form (if not previously submitted).
- ♦ Annual Certification of Compliance Report: Prepare annually, and only submit to the District if a deviation from prior compliance status occurs – due by January 31st immediately following the report period.
- ♦ Deviation Report: Submit with Annual Certification of Compliance Report (if necessary).

Existing sources currently must be in compliance; new sources must comply upon startup.

Information and forms are available at the District's Public Workshops website at http://www.sdapcd.org/homepage/public_part/workshops/public_workshops.pdf.

If you have questions concerning implementation of NESHAP 6W, please contact Dustin Rice (858-586-2643, Dustin.Rice@sdcounty.ca.gov) or Eric Luther (858-586-2656, Eric.Luther@sdcounty.ca.gov).

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