Flowchart for Determining Your Requirements Under The Plating and Polishing Area Source NESHAP (Subpart WWWWWW)

1. Is your facility a major source of HAP emissions?
   - NO
     - Do you use Cd, Cr, Pb, Mn, or Ni?
     - NO
       - Is the tank or process one of the following?
         - Electropainting or electroforming with pH < 12
         - Electropolishing
         - Thermal spraying
         - Dry mechanical polishing
       - YES
         - Is this short-term or "flash" electropainting?
           - NO
             - Is this a thermal spraying line OR dry mechanical polishing process?
             - NO
               - Use WAFS, control device, or tank cover as specified in §63.11507(a). And...
             - YES
               - Is this a temporary thermal spraying operation?
                 - NO
                   - Use a fabric filter or equivalent control device as required in §63.11507(e) or (f)
                 - YES
                   - Implement management practices as specified in §63.11507(g)
           - YES
             - Implement management practices as specified in §63.11507(g)
         - YES
           - Limit plating time or use tank cover as required in §63.11507(b) And...
     - YES
       - Not subject to Plating and Polishing Area Source Rule

2. Is your facility a major source of HAP emissions?
   - YES
     - Is this a thermal spraying line OR dry mechanical polishing process?
       - NO
         - Use WAFS, control device, or tank cover as specified in §63.11507(a). And...
       - YES
         - Use a fabric filter or equivalent control device as required in §63.11507(e) or (f)

For More Information

This brochure is a general guide only. You may review the rule for your specific requirements at: http://www.epa.gov/ttn/atw/eparules.html

For more information on state requirements, please contact your state representative found at the following link: http://www.epa.gov/ttn/atw/eparules.html

You can also contact your Regional EPA Air Toxics office at the following numbers:

<table>
<thead>
<tr>
<th>Region</th>
<th>Address</th>
<th>States</th>
<th>Website/Phone Number</th>
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<tbody>
<tr>
<td>Region 1</td>
<td>1 Congress Street</td>
<td>CT, MA, RI, VT</td>
<td><a href="http://www.epa.gov/region1">www.epa.gov/region1</a> (888) 372-7341</td>
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<td></td>
<td>Suite 1100</td>
<td>ME, NH</td>
<td>(617) 918-1650</td>
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<td>(800) 241-1754</td>
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<td><a href="http://www.epa.gov/region5">www.epa.gov/region5</a> (312) 886-6812</td>
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<td>(312) 353-6884</td>
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<td>(312) 886-6798</td>
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<td><a href="http://www.epa.gov/region6">www.epa.gov/region6</a> (800) 887-6063</td>
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<td>Dallas, TX 75202-2733</td>
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<td>(214) 665-7224</td>
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<td><a href="http://www.epa.gov/region7">www.epa.gov/region7</a> (800) 223-0425</td>
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<td>CO, MT, ND, SD, UT, WY</td>
<td><a href="http://www.epa.gov/region8">www.epa.gov/region8</a> (800) 227-8917*</td>
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<td>AK, ID, WA, OR</td>
<td><a href="http://www.epa.gov/region10">www.epa.gov/region10</a> (800) 424-4372*</td>
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<td>Suite 900, AWT-107</td>
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<td>(206) 553-6220</td>
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<td>Seattle, WA 98101</td>
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* For sources within the Region only.
PLATING AND POLISHING INDUSTRY
(SUBPART WWWWWW)

To Whom Does This Rule Apply?

- Facilities that are area sources\(^a\) of hazardous pollutants (HAP)
- Tanks / processes that contain or use any compounds of cadmium (Cd), chromium (Cr), manganese (Mn), nickel (Ni) or lead (Pb), in the following processes:
  - Non-cyanide electroplating and electroforming (pH<12), and electropolishing
  - Cyanide plating (pH ≥12)
  - Electroless plating
  - Other coating, such as chromium conversion coating
  - Thermal spraying
  - Dry mechanical polishing

What Am I Required to Do?

Specific Requirements:
- Non-cyanide electroplating and electroforming (pH<12), and electropolishing
  - Use wetting agent/fume suppressant (WAFS), control device, or tank cover
- Flash or short-term electroplating
  - Limit plating time to 3 min/hr or 1 hr/day, or use tank covers
- Other coating and plating; temporary thermal spraying, and all above electrolytic processes:
  - Management practices
- Dry mechanical polishing and permanent thermal spraying
  - Exhaust emissions to a control device

Management Practices: as applicable and practicable
- Minimize bath agitation when removing any parts processed in the tank except when necessary to meet part quality requirements.
- Maximize the draining of bath solution back into the tank by extending drip time when removing parts from the tank.
- Optimize the design of barrels, racks and parts to minimize dragout of bath solution.
- Use tank covers whenever possible, if already owned and available at the facility.
- Minimize or reduce heating of process tanks, except when doing so would interrupt production or adversely affect part quality.
- Perform regular repair, maintenance and preventive maintenance of racks, barrels, and other equipment associated with affected sources.
- Minimize bath contamination using practices such as: the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated.
- Maintain quality control of chemicals and other bath ingredient concentrations in the tanks.
- Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns.
- Minimize spills and overflow of tanks.
- Use squeegee rolls in continuous or reel-to-reel plating tanks.
- Perform regular inspections to identify leaks and other opportunities for pollution prevention.

What is the Compliance Date?
- Existing Sources: by July 1, 2010
- New Sources: upon start-up

What Reports and Records Are Required?
- Submit the Initial Notification and the Notification of Compliance Status.
- Prepare annual Certification of Compliance Report and Report of Deviations by January 31\(^{st}\). Submit both reports by January 31\(^{st}\) of the following year if any deviations occurred during the previous year.

Maintain the following records, as applicable:
- Records that demonstrate compliance with management practices.
- For cyanide tanks, the one-time pH measurement value.
- For non-cyanide tanks, amount and frequency of WAFS additions, if applicable.
- For short-term or flash electroplating tanks, the daily plating time.
- For batch electroplating tanks using covers as a control option, the time the tank is operated with cover in place.
- For continuous electroplating tanks, amount of tank surface covered and time tank is operated with cover in place.
- Operating manuals for all required control systems.
- All required notifications and reports, with supporting documentation.
- Records should be kept in a form suitable and readily available for review.

What are Reporting Dates?

- Initial Notification
  - Existing Sources: 10/29/2008
  - New Sources: upon start-up
- Notification of Compliance Status
  - Existing Sources: 07/01/2010
  - New Sources: upon start-up

Where Can I Get More Information?
- For more details, see these web links:
  - [http://www.epa.gov/ttn/atw/area/regional_contacts.pdf](http://www.epa.gov/ttn/atw/area/regional_contacts.pdf)
  - [http://www.smallbiz-enviroweb.org/sba/sbap.html](http://www.smallbiz-enviroweb.org/sba/sbap.html)
- The rule itself can be found at this link:
  - [http://www.epa.gov/ttn/atw/area/arearules.html](http://www.epa.gov/ttn/atw/area/arearules.html)

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\(^a\) An area source is a facility that emits or has the potential to emit in the absence of controls, less than 10 tons per year (tpy) of individual HAP and 25 tpy of combined HAP.