Lincoln-Lancaster County Health Department

Lincoln-Lancaster County Health Department
Air Quality Program
40 CFR Part 63 Subpart WWWWWW – Initial Notification / Notification of Compliance Status

What is the purpose of this rule?

- The United States Environmental Protection agency (US EPA) issued 40 CFR Part 63, Subpart WWWWWW (National Emission Standards for Hazardous Air Pollutants for Source Category: Area Source Standards for Plating and Polishing Operations) to establish emission limitations and standards to reduce/control hazardous air pollutants (HAP) emitted from metal plating and polishing facilities. This subpart only applies to such operations that are 'area sources' of HAPs that use or emit the following pollutants: compounds of cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn), or nickel (Ni). An *area source* is a facility with total potential to emit less than 10 tons of any individual HAP, and less than 25 tons of total combined HAPs.

Who is subject to this rule?

- You are subject to this rule as a 'plating and polishing operation' if you own or operate a 'new' or 'existing' facility that performs one or more of the following:
  - Electroplating (except chromium), electroless plating, or non-electrolytic plating;
  - Other non-electrolytic metal coating processes, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating;
  - Thermal spraying;
  - Dry mechanical polishing of finished metals and formed products after plating;
  - Electroforming or electropolishing.
- Your source is 'new' if you commenced construction or reconstruction of the affected source after March 14, 2008. Your source is 'existing' if you commenced construction/reconstruction on or before March 14, 2008.

What plating or polishing activities are **not** subject to this rule?

- Chromium electroplating is not subject to this rule because it is regulated under 40 CFR Part 63, Subpart N.
- Any material that does not contain cadmium (Cd), chromium (Cr), lead (Pb), or nickel (Ni) in amounts greater than or equal to 0.1% by weight (as the metal), and does not contain manganese (Mn) in amounts greater than or equal to 1.0% by weight (as the metal), as reported on the Safety Data Sheet for the material, is not considered to be a plating and polishing metal HAP. Processes involving materials containing the target HAPs below these thresholds are not considered affected sources under Subpart WWWWWW.

When am I required to comply with this rule?

- The 'compliance deadline' for this rule has already passed. All affected sources must currently be in compliance, or must comply with the rule upon start-up.

What is the purpose of this form, and when do I need to submit it?

- The purpose of this form is to notify the Lincoln-Lancaster County Health Department (LLCHD) and the US EPA that your facility is subject to the requirements of this rule, and to provide those agencies with needed information.
- You **must** complete and submit this form to both the LLCHD and US EPA. If you own/operate an 'existing' source, and you have not already completed and submitted this form, you must do so immediately. If you construct and start-up a 'new' source, you must submit this form upon initial start-up.
- This document **must** be signed and certified by an individual who meets the definition of a 'Responsible Official' set forth in Article 2, Section 1 of the Lincoln-Lancaster County Air Pollution Control Program Regulations and Standards.

Where do I send the completed form?

- Send a copy of the signed and completed form to each of the following. Keep an additional copy for your records.

Lincoln-Lancaster County Health Department
ATTN: Air Quality Program
3131 O Street
Lincoln, NE 68510

US EPA Region 7
ATTN: AWMD-APCO
11201 Renner Blvd.
Lenexa, KS 66219

If you have any questions about this rule, or need any help completing this form, please call the LLCHD Air Quality Program at (402) 441-8040.

Lincoln-Lancaster County Health Department

Environmental Public Health Division
Air Quality Program
3131 O Street
Lincoln, Nebraska 68510

Phone: (402) 441-8040 Fax: (402) 441-3890

Initial Notice/Notice of Compliance Status for 40 CFR 63 Subpart WWWWWW – National Emission Standards for Hazardous Air Pollutant Area Sources: Standards for Plating and Polishing Operations

Section 1: Facility Information

Please provide the following information:

LLCHD Air Quality Program Source Number (if known):	
Facility Name:	
Facility Address:	
Mailing Address (if different)**:**	
City, State, ZIP:	
Facility NAICS:	

Section 2: Contact Information

Please provide the following information:

Contact Person Name:	
Contact Person Title:	
Phone Number:	
E-Mail Address:	

Section 3: Responsible Official Certification

I am submitting this Initial Notification / Notification of Compliance Status pursuant to 40 CFR 63 Subpart WWWWWW §63.11509 paragraph (a)-(b). I certify the information contained in this notification to be accurate and true to the best of my knowledge.

☐ **I hereby certify that my facility is in compliance with the requirements of Subpart WWWWWW.**	
Responsible Official Name:	
Responsible Official Title:	
Phone Number:	
_____ *(Signature of Responsible Official)*	_____ *Date*

Section 4: Description of Affected Source

1.	**Check the box below that correctly describes your facility's date of construction or reconstruction.**
☐	Constructed or reconstructed on or before March 14, 2008 = 'Existing source'
☐	Constructed or reconstructed after March 14, 2008 = 'New source'

2. Check the appropriate box, or boxes, below that reflects the type(s) of plating and/or polishing activities performed at your facility. Check all that apply.

☐	Electroplating (non-cyanide)	☐	Electroplating (cyanide)
☐	Short-term electroplating (non-cyanide)	☐	Electroless nickel
☐	Electroforming	☐	Electropolishing
☐	Chrome conversion coating	☐	Other electroless plating/coating/dipping
☐	Thermal spraying (permanent line)	☐	Thermal spraying (temporary* / in-situ)
☐	Dry mechanical polishing		* 'Temporary' means less than 1 hour/day of use.

3. If you have any permanent thermal spraying booths/lines or dry mechanical polishing processes that are subject to Subpart WWWWWW (as indicated in #2 above), use the following table to list each unit and the HAP emitted or used and if any air pollution control device is currently being used. Skip if this question does not apply.

Line ID (name or #)	Equipment Type	HAP Emitted (Cd, Cr, Pb, Mn, Ni)	Are emissions controlled?	Emission Control Device Type
	☐ Thermal Spray Booth/Line ☐ Dry Mechanical Polishing		☐ Yes ☐ No	
	☐ Thermal Spray Booth/Line ☐ Dry Mechanical Polishing		☐ Yes ☐ No	
	☐ Thermal Spray Booth/Line ☐ Dry Mechanical Polishing		☐ Yes ☐ No	
	☐ Thermal Spray Booth/Line ☐ Dry Mechanical Polishing		☐ Yes ☐ No	
	☐ Thermal Spray Booth/Line ☐ Dry Mechanical Polishing		☐ Yes ☐ No	
	☐ Thermal Spray Booth/Line ☐ Dry Mechanical Polishing		☐ Yes ☐ No	

4. If you have any temporary thermal spraying booths/lines that are subject to Subpart WWWWWW (as indicated in #2 above), use the following table to list each unit and the HAP emitted or used and if any management practices are currently being used. Skip if this question does not apply.

Line ID (name or #)	Equipment Type	HAP Emitted (Cd, Cr, Pb, Mn, Ni)	Mgt. practices used?	Describe management practices used.
	Temp Thermal Spray Booth/Line		☐ Yes ☐ No	
	Temp Thermal Spray Booth/Line		☐ Yes ☐ No	
	Temp Thermal Spray Booth/Line		☐ Yes ☐ No	
	Temp Thermal Spray Booth/Line		☐ Yes ☐ No	
	Temp Thermal Spray Booth/Line		☐ Yes ☐ No	
	Temp Thermal Spray Booth/Line		☐ Yes ☐ No	

5. **Use the table below to list each tank and HAP emitted or used, and the compliance methods that are utilized on each tank. Refer to the table provided in Question #2 of this document to describe the 'Activity Type' in the 2nd column of this table. Duplicate this table as needed.**
   - **For the purposes of this question, the compliance methods listed below mean the following:**
     - **WAFS = use of wetting agent / fume suppressant**
     - **N/A = not applicable at the time of this notification**
     - **Time limit = limit on the amount of time operated, applies to short-term electroplating only**

Line ID (name or #)	Equipment Type	HAP Emitted (Cd, Cr, Pb, Mn, Ni)	Compliance method(s) used:	
			☐ WAFS ☐ Tank Cover ☐ Control Device	☐ Mgt. Practices ☐ Time Limit ☐ N/A
			☐ WAFS ☐ Tank Cover ☐ Control Device	☐ Mgt. Practices ☐ Time Limit ☐ N/A
			☐ WAFS ☐ Tank Cover ☐ Control Device	☐ Mgt. Practices ☐ Time Limit ☐ N/A
			☐ WAFS ☐ Tank Cover ☐ Control Device	☐ Mgt. Practices ☐ Time Limit ☐ N/A
			☐ WAFS ☐ Tank Cover ☐ Control Device	☐ Mgt. Practices ☐ Time Limit ☐ N/A
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			☐ WAFS ☐ Tank Cover ☐ Control Device	☐ Mgt. Practices ☐ Time Limit ☐ N/A
			☐ WAFS ☐ Tank Cover ☐ Control Device	☐ Mgt. Practices ☐ Time Limit ☐ N/A
			☐ WAFS ☐ Tank Cover ☐ Control Device	☐ Mgt. Practices ☐ Time Limit ☐ N/A

6. The following management practices, as applicable, must be utilized at sources that are subject to Subpart WWWWWW. Do you certify that you are in compliance with these management practices as they apply to your facility?

☐ **Yes, my facility is in compliance with all applicable management practices.**

- Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.
- Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts lowly from the tank, as practicable.
- Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable.
- Use tank covers, if already owned and available at the facility, whenever practicable.
- Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).
- Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.
- Minimize bath contamination, such as through 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 re-treated parts to be plated, as practicable.
- Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.
- Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic wash-downs, as practicable.
- Minimize spills and overflow of tanks, as practicable.
- Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.
- Perform regular inspections to identify leaks and other opportunities for pollution prevention.