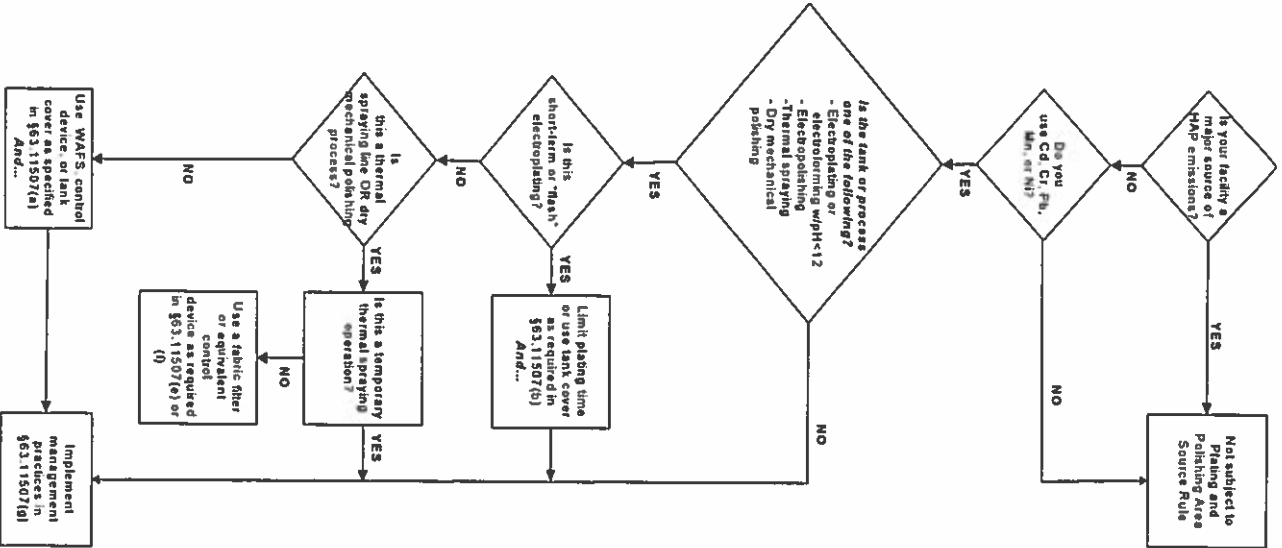


**Flowchart for Determining Your Requirements Under
The Plating and Polishing Area Source NESHAP
(Subpart WWWWVV)**



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

| Address | States | Web/Email | Phone Number |
|---|--|--|--|
| Region 1 1 Congress Street Suite 1100 Boston, MA 02114-2023 | CT, MA, ME, NH, RI, VT | www.epa.gov/region1 | (888) 372-7341 (617) 918-1650 |
| Region 2 290 Broadway New York, NY 10007-1866 | NJ, NY, PR, VI | www.epa.gov/region2 | (212) 637-4023 |
| Region 3 1650 Arch Street Philadelphia, PA 19103-2029 | DE, MD, PA, VA, WV, DC | www.epa.gov/region3 | (800) 228-8711 (215) 814-2196 |
| Region 4 Atlanta Federal Center 61 Forsyth Street, SW Atlanta, GA 30303-8960 | FL, NC, SC, KY TN, GA, AL, MS | www.epa.gov/region4 | (404) 562-9131 (800) 241-1754 |
| Region 5 77 West Jackson Blvd. Chicago, IL 60604-3507 | IL, IN, MI, WI, MN, OH | www.epa.gov/region5 | (312) 886-6812 (312) 353-6684 (312) 886-6798 |
| Region 6 1445 Ross Avenue Suite 1200 Dallas, TX 75202-2733 | AR, LA, NM, OK, TX | www.epa.gov/region6 | (800) 887-6063 (214) 665-7250 (214) 665-7224 |
| Region 7 901 North Fifth Street Kansas City, KS 66101 | IA, KS, MO, NE | www.epa.gov/region7 | (800) 223-0425 (913) 551-7003 |
| Region 8 1595 Wynkoop St. Denver, CO 80202-1129 | CO, MT, ND, SD, UT, WY | www.epa.gov/region8 | (800) 227-8917* (303) 312-6460 |
| Region 9 75 Hawthorne Street San Francisco, CA 94105 | CA, AZ, HI, NV, GU, AS, MP | www.epa.gov/region9 | (415) 744-1197 |
| Region 10 1200 6th Ave. Suite 900, AWT-107 Seattle, WA 98101 | AK, ID, WA, OR | www.epa.gov/region10 | (800) 424-4372* (206) 553-6220 |

* For sources within the Region only.

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/area/area/rules.html>
For more information on state requirements, please contact your state representative found at the following link:
http://www.epa.gov/ttn/atw/area/table_state_contacts.doc or,
<http://www.4cleanair.org/contactUsaLevel.asp>

Office of Air Quality Planning & Standards



**Summary of Regulations
Controlling Air
Emissions from**

**PLATING AND POLISHING
OPERATIONS**

**NATIONAL EMISSION
STANDARDS FOR
HAZARDOUS AIR
POLLUTANTS
NESHAP
(SUBPART WWWWVV)
FINAL RULE**



PLATING AND POLISHING INDUSTRY (SUBPART WWWWWW)

To Whom Does This Rule Apply?

- Facilities that are area sources⁹ 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 electroplating
 - 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 electroplating
 - Use wetting agent/fume suppressant (MAFS), 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.

⁹ 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.

- 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 squeeze 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 but do not submit unless deviations.
- Prepare Deviation Report if deviations occur and submit the first January following the deviation along with Certification of Compliance Status Report.

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 the Reporting Dates?

- Initial Notification
 - Existing Sources: 10/29/2008
 - New Sources: 10/29/2008 or upon start-up (Note: this is a rule correction)
- Notification of Compliance Status
 - Existing Sources: 07/01/2010
 - New Sources: upon start-up
- First Certification of Compliance Report
 - Existing sources: January 31, 2011
 - New Sources: January 31 of year following startup
 - Prepare but do not submit

Annual Certification of Compliance Report

- Prepare by January 31 of each year following first report. Do not submit unless deviations occur

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.smallbiz-environmentweb.org/sba/sba.html>