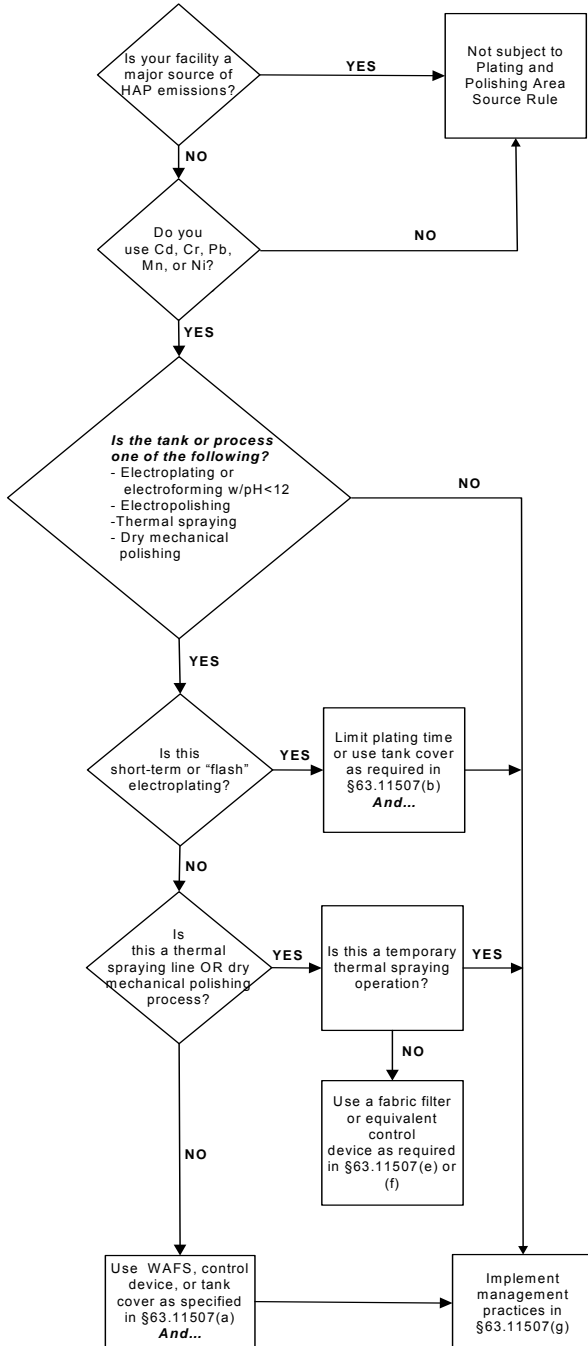


**Flowchart for Determining Your Requirements Under  
The Plating and Polishing Area Source NESHAP  
(Subpart WWWWWW)**



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

Address	States	Website/ Phone Number
Region 1 5 Post Office Square, Suite 100 Mail code: OES04-2 Boston MA 02109-3912	CT, MA, ME, NH, RI, VT	<a href="http://www.epa.gov/region1">www.epa.gov/region1</a> (888) 372-7341 (617) 918-1650
Region 2 290 Broadway New York, NY 10007-1866	NJ, NY, PR, VI	<a href="http://www.epa.gov/region2">www.epa.gov/region2</a> (212) 637-4023
Region 3 1650 Arch Street Philadelphia, PA 19103-2029	DE, MD, PA, VA, WV, DC	<a href="http://www.epa.gov/region3">www.epa.gov/region3</a> (800) 228-8711 (215) 814-2061
Region 4 Atlanta Federal Center 61 Forsyth Street, SW Atlanta, GA 30303-8960	FL, NC, SC, KY, TN, GA, AL, MS	<a href="http://www.epa.gov/region4">www.epa.gov/region4</a> (404) 562-9131 (800) 241-1754
Region 5 77 West Jackson Blvd. Chicago, IL 60604-3507	IL, IN, MI, WI, MN, OH	<a href="http://www.epa.gov/region5">www.epa.gov/region5</a> (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	<a href="http://www.epa.gov/region6">www.epa.gov/region6</a> (800) 887-6063 (214) 665-7250 (214) 665-7224
Region 7 901 North Fifth Street Kansas City, KS 66101	IA, KS, MO, NE	<a href="http://www.epa.gov/region7">www.epa.gov/region7</a> (800) 223-0425 (913) 551-7003
Region 8 1595 Wynkoop St. Denver, CO 80202-1129	CO, MT, ND, SD, UT, WY	<a href="http://www.epa.gov/region8">www.epa.gov/region8</a> (800) 227-8917* (303) 312-6460
Region 9 75 Hawthorne Street San Francisco, CA 94105	CA, AZ, HI, NV, GU, AS, MP	<a href="http://www.epa.gov/region9">www.epa.gov/region9</a> (415) 744-1197
Region 10 1200 6 <sup>th</sup> Ave. Suite 900, AWT-107 Seattle, WA 98101	AK, ID, WA, OR	<a href="http://www.epa.gov/region10">www.epa.gov/region10</a> (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/arearules.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](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 WWWWWW)  
FINAL RULE**



# PLATING AND POLISHING INDUSTRY (SUBPART WWWWWW)

## To Whom Does This Rule Apply?

- Facilities that are area sources<sup>a</sup> 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.

<sup>a</sup> 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 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 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.epa.gov/ttn/atw/area/regional_contacts.pdf)  
<http://www.smallbiz-enviroweb.org/sba/sbap.html>