

**Sample Recordkeeping and Annual Compliance Certification Report for  
National Emission Standards for Hazardous Air Pollutants:  
Area Source Standards for Plating and Polishing Operations**

**40 CFR 63 subpart WWWW (6W)**

Section 1 discusses in general the information needed for the annual compliance certification report and provides some sample logs and tables for recording information needed to demonstrate continued compliance. Please note that this may not be all the records necessary for showing continued compliance depending on the particular process. Also note that these are just sample logs and if a particular log is needed, it should be expanded to include all the different dates and times at which data needs to be entered. Section 2 provides an example of what a report could look like if all of the different affected processes were conducted at a facility.

**Section 1: Annual compliance certification report**

If you own or operate an affected source, you must prepare an annual compliance certification report by January 31<sup>st</sup> of the year immediately following the year to be reported. For existing sources, the first year to be reported is 2010 and the annual compliance certification report needs to be prepared by January 31, 2011. These reports **do not need to be submitted** unless a deviation from the requirements of this rule has occurred during the reporting year, in which case, the annual compliance certification report must be submitted along with the deviation report on the January following the year in which there was a deviation.

The annual compliance certification report should include the following records:

- Records that demonstrate compliance with management practices.
- For cyanide tanks, the one-time pH measurement value.
- For non-cyanide tanks, amount and frequency of wetting agent/foam suppressant 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.

You must keep these reports for 5 years. Only the most recent 2 years are required to be kept onsite.

Below is an example of the records needed to be kept for the annual compliance certification report. This example is to provide some idea on what data might need to be recorded to demonstrate continuous compliance with the rule.

**1) Maintenance**

Process equipment and air pollution control devices require regular maintenance and inspections. The equipment and device manuals should detail maintenance schedules and points of inspection. Make a record of any maintenance conducted and when inspections are performed.

**Inspections**

Device inspected: \_\_\_\_\_

Date of inspection: \_\_\_\_\_ Date of last inspection: \_\_\_\_\_

Inspector: \_\_\_\_\_

Description of working condition: \_\_\_\_\_

Actions taken to correct deficiencies found during inspection: \_\_\_\_\_

\_\_\_\_\_

**Maintenance of source and control devices**

Equipment	Tanks	Control Devices	Filters (if applicable)	Other: (specify) <sup>a</sup>
Date				
Date				
Date				

<sup>a</sup> Examples: replaced nozzles, adjusted fan motor, replaced recirculation pump, etc.

**Corrective Actions:**

Describe actions taken and maintenance performed to correct any deficiencies.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_ Date: \_\_\_/\_\_\_/\_\_\_ Initials: \_\_\_\_\_ Supervisor informed (Y/N): \_\_\_\_\_

**2) Non-cyanide electroplating, electroforming, or electropolishing using a wetting agent**

If you operate a non-cyanide electroplating, electroforming, or electropolishing tank (electrolytic process tank) that operates at a pH of less than 12, and you use a wetting agent or fume suppressant (WAFS), keep track of the following to show that the WAFS is kept in proportion to the other bath chemistry ingredients.

- a. Original make-up of the tank: \_\_\_\_\_
- b. Amount of WAFS in original make-up: \_\_\_\_\_
- c. Proportion of WAFS to other ingredients: \_\_\_\_\_

Operator's Initials	Date	Amount of wetting agent/fume suppressant added

**3) Non-cyanide electroplating, electroforming, or electropolishing using a control device**

If you operate a non-cyanide electroplating, electroforming, or electropolishing tank (electrolytic process tank) that operates at a pH of less than 12, and you use a control device, keep track of the following to show continuous compliance. If a malfunction or failure occurs with a control device, take immediate corrective actions to return the equipment to normal operation according to the operating manual.

**Malfunction records**

Date of occurrence: \_\_\_\_\_ Time of occurrence: \_\_\_\_\_

Description of malfunction: \_\_\_\_\_

\_\_\_\_\_

Corrective action taken: \_\_\_\_\_

\_\_\_\_\_

Date malfunction corrected: \_\_\_\_\_ Duration of malfunction: \_\_\_\_\_

**Inspections**

Device inspected: \_\_\_\_\_

Date of inspection: \_\_\_\_\_ Date of last inspection: \_\_\_\_\_

Inspector: \_\_\_\_\_

Description of working condition: \_\_\_\_\_

Actions taken to correct deficiencies found during inspection: \_\_\_\_\_

\_\_\_\_\_

**Maintenance of control device**

Equipment	Control Devices	Filters (if applicable)	Other: (specify) <sup>a</sup>
Date			
Date			
Date			

<sup>a</sup> Examples: replaced nozzles, adjusted fan motor, replaced recirculation pump, etc.

Corrective Actions (in case of deviation from proper operation:  
Describe actions taken and maintenance performed to correct any deficiencies.

\_\_\_\_\_  
\_\_\_\_\_/\_\_\_\_/\_\_\_\_ Initials: \_\_\_\_\_ Date: \_\_\_\_\_

**4) Short-term or flash electroplating complying by limiting plating time**

If you operate a flash or short-term electroplating tank and comply with the rule through limiting the amount of plating time, you must demonstrate continuous compliance by keeping track of the length of time that the tank is operated per day. If the tank is in operation multiple times per day, keep track of the cumulative time of operation per day. The rule limits flash or short term processes to operating no more than 3 cumulative minutes per hour and no more than 1 hour per day.

Operator's Initials	Date	Time	Length of time operated (min)	Cumulative time operated per day

**5) Batch non-cyanide electroplating, electroforming, or electropolishing or flash/short-term electroplating using a tank cover**

If you operate a batch non-cyanide electrolytic process tank or a flash/short-term electroplating tank and you use a tank cover to comply with the rules, you must keep the cover in place at least 95% of the operating time.

Operator's Initials	Date	Time tank operated	Time tank covered

**6) Continuous non-cyanide electroplating, electroforming, or electropolishing using a tank cover**

If you operate a continuous non-cyanide electrolytic process tank and you use a tank cover to comply with the rules, 75% of the surface of the tank must be covered during all periods of electrolytic process operation.

Size of tank (surface area): \_\_\_\_\_  
 Size of cover (surface area): \_\_\_\_\_  
 Percentage of coverage: \_\_\_\_\_

**7) Process tank containing cyanide**

If you operate a process tank that uses cyanide in the bath, you must record the pH of the bath upon start-up.

Operator's Initials	Date	pH on start-up

**8) Dry mechanical polishing process or permanent thermal spraying process**

Each of these processes requires a control device to capture particulate matter (PM) emissions. Compliance is demonstrated through operating and maintaining the devices according to the manufacturer's specifications and instructions. Use the maintenance log to record inspections and maintenance to show that the devices are kept in correct working order.

**Section 2: Example Annual Compliance Certification Report**

Below is an example annual compliance certification report.

Company name: \_\_\_\_\_

Facility name (if different): \_\_\_\_\_

Facility (physical location) address: \_\_\_\_\_

Owner name/title: \_\_\_\_\_

Owner/company address: \_\_\_\_\_

Owner telephone number: \_\_\_\_\_ Owner email address (if available): \_\_\_\_\_

If the Operator information is different from the Owner, please provide the following:

Operator name/title: \_\_\_\_\_

Operator Address: \_\_\_\_\_

Operator telephone number: \_\_\_\_\_ Operator email address (if available): \_\_\_\_\_

**1) Non-cyanide electroplating, electroforming, or electropolishing using a wetting agent**

I hereby certify that wetting agents or fume suppressants were added to the bath according to manufacturer's specifications and instructions.

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(Name/title)

(\_\_\_\_\_)\_\_\_\_\_  
(Telephone No.)

**2) Non-cyanide electroplating, electroforming, or electropolishing ; dry mechanical process; permanent thermal spraying process using a control device**

I hereby certify that control devices were maintained and operated according to manufacturer's specifications and instructions.

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(Name/title)

(\_\_\_\_\_)\_\_\_\_\_  
(Telephone No.)

**3) Short-term or flash electroplating complying by limiting plating time**

I hereby certify that flash or short-term electroplating was limited to no more than 3 cumulative minutes per hour and no more than 1 hour cumulative per day.

\_\_\_\_\_  
(Signature) \_\_\_\_\_  
(Date)  
\_\_\_\_\_  
(Name/title) (\_\_\_\_\_) \_\_\_\_\_  
(Telephone No.)

**4) Batch non-cyanide electroplating, electroforming, or electropolishing or flash/short-term electroplating using a tank cover**

I hereby certify that the tank cover was in place during at least 95% of the electrolytic process time.

\_\_\_\_\_  
(Signature) \_\_\_\_\_  
(Date)  
\_\_\_\_\_  
(Name/title) (\_\_\_\_\_) \_\_\_\_\_  
(Telephone No.)

**5) Continuous non-cyanide electroplating, electroforming, or electropolishing using a tank cover**

I hereby certify that the tank cover covered at least 75% of the surface area of the tank during all periods of the electrolytic process time.

\_\_\_\_\_  
(Signature) \_\_\_\_\_  
(Date)  
\_\_\_\_\_  
(Name/title) (\_\_\_\_\_) \_\_\_\_\_  
(Telephone No.)

**6) Applicable management practices**

I hereby certify that all applicable management practices were implemented as practicable during all times of operation of the affected tank or process.

\_\_\_\_\_  
(Signature) \_\_\_\_\_  
(Date)  
\_\_\_\_\_  
(Name/title) (\_\_\_\_\_) \_\_\_\_\_  
(Telephone No.)