Sample Initial/Compliance Notification
Tennessee Plating and Polishing Facilities affected by the National Emission Standards for Hazardous Air Pollutants: Plating and Polishing Operations (rule 6W)

(For Sources not located in Davidson, Hamilton, Knox, Shelby Counties-These Counties should check with local air program)

SECTION I: GENERAL INFORMATION

Source Description-New/Existing: ☐ Existing source: July 1, 2010 (constructed on or before March 14, 2008)
☐ New source. _____ Date of Start up
A New Source is a facility where construction began after March 14, 2008.

Company name: _____
Facility name (if different): _____
Facility (physical location) address: _____
Owner name/title: _____
Owner/company address: _____
Owner telephone number: _____ Owner email address (if available):_____

Is the Operator the same person as the Owner? Yes ☐ No ☐

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): _____

After review of the materials, it is determined that:

This facility: ☐ is **NOT** affected
☐ **IS** affected
by the National Emission Standards for Hazardous Air Pollutants: Plating and Polishing Operations (rule 6W)

--Proceed to SECTION 3 (last page) if NOT an affected source--

SECTION 2: IDENTIFICATION OF AFFECTED OPERATIONS[B]

(1) The following are the operations at this facility subject to subpart WWWWWW (check all that apply):

Electroplating (non-cyanide)	☐	Electroless nickel	☐
Continuous electroplating (non-cyanide)	☐	Chrome conversion coating	☐
Short-term electroplating (non-cyanide)	☐	Other electroless plating/coating/dipping	☐
Electropolishing	☐	Thermal spraying (permanent line)	☐
Electroforming	☐	Thermal spraying (temporary, in-situ)	☐
Electroplating (cyanide)	☐	Dry mechanical polishing	☐

[b] ***Important Note:*** *These operations are affected sources under subpart WWWWWW* ***only if/when*** *they use materials that contain or have the potential to emit Plating and Polishing metal HAP. Plating and Polishing* ***HAP containing/potential*** *is defined to be when the elemental form or compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead, are used or have the potential to be emitted in quantities of 0.1 percent or more, or 1.0 percent or more for elemental or compounds of manganese.*

Compliance Method Descriptions

(2) The following table lists the compliance methods used on each affected <u>tank processes</u> at this facility that were checked previously in item (1) in Section 2:

Tank Process Description/ID No. (use any unique number, letter or other identifier and include pH of the bath if applicable)	List HAP Emitted or Used (Cd, Cr, Pb, Mn, Ni)	Compliance Method(s) (Check all that apply)
		☐ Wetting agent/fume suppressant ☐ Vented to a control device; describe:________________ ☐ Tank cover (percent covered:______) ☐ Time limit (short-term plating only) ☐ Management practices
		☐ Wetting agent/fume suppressant ☐ Vented to a control device describe:________________ ☐ Tank cover (percent covered:______) ☐ Time limit (short-term plating only) ☐ Management practices
		☐ Wetting agent/fume suppressant ☐ Vented to a control device; describe:________________ ☐ Tank cover (percent covered:______) ☐ Time limit (short-term plating only) ☐ Management practices
		☐ Wetting agent/fume suppressant ☐ Vented to a control device; describe:________________ ☐ Tank cover (percent covered:______) ☐ Time limit (short-term plating only) ☐ Management practices
		☐ Wetting agent/fume suppressant ☐ Vented to a control device; describe:________________ ☐ Tank cover (percent covered:______) ☐ Time limit (short-term plating only) ☐ Management practices
		☐ Wetting agent/fume suppressant ☐ Vented to a control device; describe:________________ ☐ Tank cover (percent covered:______) ☐ Time limit (short-term plating only) ☐ Management practices
		☐ Wetting agent/fume suppressant ☐ Vented to a control device; describe:________________ ☐ Tank cover (percent covered:______) ☐ Time limit (short-term plating only) ☐ Management practices
		☐ Wetting agent/fume suppressant ☐ Vented to a control device; describe:________________ ☐ Tank cover (percent covered:______) ☐ Time limit (short-term plating only) ☐ Management practices

(3) The following table lists each affected thermal spraying booths/lines (temporary and permanent), and dry mechanical polishing processes subject to subpart WWWWWW, noted previously in item (1) in Section 2:

Thermal Spray Booth/Line or Dry Mechanical Polishing Description/ID No.	List HAP Emitted or Used (Cd, Cr, Pb, Mn, Ni)	Compliance Method(s) (Check all that apply)
		☐ Vented to a control device; describe:________________ ☐ Management practices (temporary thermal spraying only)
		☐ Vented to a control device; describe:________________ ☐ Management practices (temporary thermal spraying only)
		☐ Vented to a control device; describe:________________ ☐ Management practices (temporary thermal spraying only)
		☐ Vented to a control device; describe:________________ ☐ Management practices (temporary thermal spraying only)
		☐ Vented to a control device; describe:________________ ☐ Management practices (temporary thermal spraying only)
		☐ Vented to a control device; describe:________________ ☐ Management practices (temporary thermal spraying only)
		☐ Vented to a control device; describe:________________ ☐ Management practices (temporary thermal spraying only)
		☐ Vented to a control device; describe:________________ ☐ Management practices (temporary thermal spraying only)
		☐ Vented to a control device; describe:________________ ☐ Management practices (temporary thermal spraying only)
		☐ Vented to a control device; describe:________________ ☐ Management practices (temporary thermal spraying only)
		☐ Vented to a control device; describe:________________ ☐ Management practices (temporary thermal spraying only)

(4) The following checked management practices are used at this facility, as practicable:

☐ 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 slowly 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 pre-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 washdowns, 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.

SECTION 3: CERTIFICATION (Check appropriate box)

☐ Yes, the affected facility **IS** operating in compliance with all of the relevant standards and other requirements of 40 CFR Part 63 subpart WWWWWW, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations

☐ No, the affected facility is **NOT** operating in compliance with all of the relevant standards and other requirements of 40 CFR Part 63 subpart WWWWWW, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations

Reason for noncompliance:

_____

I hereby certify that the information presented herein is correct to the best of my knowledge.

_____ _____
(Signature) (Date)

_____ (____)_____
(Name/title) (Telephone No.)

If you have questions about these environmental regulations affecting your business, contact Donovan Grimwood with the Tennessee Small Business Environmental Assistance Program at 1-800-734-3619 or at BGSBEAP@tn.gov.

Submit the required information no later than July 1, 2010 to the following addresses:

EPA Region IV
Director, Air, Pesticides and Toxics Management Division
ATTN: Notification of Compliance – Plating and Polishing GACT
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303–3104

AND

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
ATTN: Notification of Compliance – Plating and Polishing GACT
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, Tennessee 37243