Advice & Counsel

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Chromium MACT-Part II

In the last issue, we promised to provide a summary of the monitoring and reporting requirements for decorative chromium platers, hard chromium platers, and anodizers using chromic acid. Our last article was based on a pre-publication copy of the regulation that we were fortunate enough to obtain. Since then, the regulation has been published in the *Federal Register* (page 4948 of Volume 60, dated January 25, 1995).

The clock is now ticking. Hard chromium platers have until January 25, 1997, and decorative chromium platers have until January 25, 1996, to comply with the provisions of these regulations. There is a provision for requesting a one-year extension. Such a request must be made at least six months before the final compliance date.

Facilities that construct a new emission source (process tank) or reconstruct an existing one after January 25, 1995, must comply with the regulations upon the date of startup. Facilities that started a new or reconstructed process tank after December 16, 1993, but before January 25, 1995, must follow an approved schedule of compliance.

Of major concern in the published regulation is a provision requiring **all regulated facilities** to be covered by a Title V (Clean Air Act) permit. This will mean facilities that currently have a Federally Enforceable State Operating Permit (FESOP), or Synthetic Minor Permit, may lose those permits, and will need to file for a Title V permit instead. It also means that decorative chromium platers, even those using a trivalent solution, will need a Title V permit.

Let's get back to the monitoring and reporting requirements.

Reporting Requirements (existing sources):

Action	Time Frame
Initial notification (all sources)	July 24, 1995
Notification of performance test	60 days prior to test
Notification of compliance status	Within 90 days of performance test, or within 30 days of compliance date
Notification of performance test results	Within 90 days of performance test
Compliance status of major sources	Two times per year (four times per year if limit is exceeded)
Compliance status for area sources	Once per year (twice per year if limit is exceeded)
Notification of compliance status for trivalent chromium decorative platers	Within 30 days of compliance

Note: *Ongoing compliance reporting frequency may be decreased upon approval from the control authority, if two semi-annual or four quarterly reports demonstrate that the source is in compliance.*

Initial Performance Test

Decorative chromium platers and anodizers using chromic acid do not need to conduct an initial performance test to prove they are emitting less than the regulated maximum, if:

1. They use a wetting agent to reduce the surface tension of their process solution below 45 dynes/cm.
2. They comply with the monitoring requirements listed previously, and the record-keeping required by the regulation.

Decorative chromium platers using trivalent solutions that include a wetting agent are not required to conduct an initial performance test.

Record-Keeping Requirements

Each facility must keep the following records:

1. Records of inspections of control equipment/ductwork, along with observations and actions taken in response to a detected problem.
2. All maintenance performed on the control device and on the emission source (process tank).
3. Malfunctions, including the duration, cause and remedy.
4. Actions taken during malfunctions that are outside the O&M manual.
5. Other records that may be deemed necessary to demonstrate consistent compliance with the operation and maintenance plan.
6. Test reports documenting results of all performance tests.
7. All data associated with the performance test.
8. All monitoring data associated with the initial compliance test, including date and time data was collected.

9. The date and time any excess emissions caused by a malfunction began and ended.
10. The date and time any excess emissions **not** caused by a malfunction began and ended.
11. The total process operating time for the emission source during the reporting period.
12. The month-to-date, and year-to-date ampere hr of operation for a hard chromium plating facility.
13. Facilities using fume suppressants are to keep records of the date and time that fume suppressants were added to the process.
14. Trivalent chromium platers must keep records showing the purchase of the bath additive containing the wetting agent and must obtain identification of same from the manufacturer of the process.
15. Any other information that demonstrates a source is meeting the requirements of any waiver provisions of the regulations.
16. All other documentation that supports the notification and reporting requirements.

All records must be kept for five years. I recommend keeping all records permanently, but especially the initial performance and compliance test data.

Because the clock is ticking, you should begin now to gather the data, order necessary equipment, and create the books/records for compliance. o

Author's note: *This column is our best effort to provide a summary guidance of the monitoring and record-keeping requirements of the regulation. It should not be interpreted as legal advice, or a complete compilation of requirements. Each facility must become familiar with the regulations and how they apply. States with control authority will be issuing compliance guidance shortly, and AESF, along with its branches, will also provide help.*

Coming Next Month

Watch for coverage of AESF COMPLIANCE WEEK, including the 16th AESF/EPA Conference on Pollution Prevention & Control, in the April issue of *P&SF.*

Monitoring Requirements (existing sources)

Emission Control	Monitoring Required	Frequency
Composite Mesh Pad (CMP)	Pressure drop across unit	Daily
	Visual inspection of pads	3 months
	Visual inspection of ductwork	3 months
	Wash down of system	Per mfg.
	Clean Pitot tube	3 months
Packed-Bed Scrubber (PBS)	Velocity pressure at the inlet of the control system plus pressure drop across unit	Daily
	Visual inspection of scrubber	3 months
	Visual inspection of mist control	3 months
	Visual inspection of ductwork	3 months
	Wash down of system	Per mfg.
	Add fresh water to top of unit	As required
	Clean Pitot tube	3 months
Combination (CMP/PBS)	Pressure drop across unit	Daily
	Visual inspection of pads	3 months
	Visual inspection of ductwork	3 months
	Wash down of system	Per mfg.
	Clean Pitot tube	3 months
Fiber-bed Mist Eliminator	Pressure drop across unit plus pressure drop across upstream plugging control device	Daily
	Visual inspection of system	3 months
	Visual inspection of ductwork	3 months
	Wash down of fiber elements	Per mfg.
	Clean Pitot tube	3 months
Wetting Agent	Surface tension measurement	4 hr*
Foam Blanket	Thickness of foam	1 hr**
Other Methods of Control	Monitoring requirements will be identified by facility requesting authorization from control authority	

The listed inspections and monitoring are to be part of an O&M manual that must be created by each facility.

**Time between surface tension readings may be increased to eight hr, if limits are not exceeded for 40 hr. Then, if limits are not exceeded for 40 hr, measurements may be made every 40 hr. The time between measurements cannot be greater than 40 hr of tank operation.*

***Time between foam blanket thickness readings may be increased to four hr, if limits are not exceeded for 40 hours. Then, if limits are not exceeded for 40 hr, measurements may be made every eight hr. The time between measurements cannot be greater than eight hr of tank operation.*