

Enviroscope

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Chromium NESHAP-Where are We Now?

ver the past two years, there have been numerous articles on the national emission standards for hazardous air pollutants (NESHAP) for chromium, and the impact it would have on the chromium plating and anodizing industry. Most of the reporting deadlines have passed since the final rules were published (January 25, 1995). By this time, chromium platers should have already established standardized record-keeping practices that clearly document compliance with all of the required provisions. A summary of the reporting and record-keeping information that should be on file at this stage of the compliance schedule follows:

Categories

The NESHAP standard separates the regulated industry base into two categories:

- 1. Existing or new decorative chromium plating.
- 2. Existing or new hard chromium plating and anodizing.

Decorative Chromium Platers All of the reporting and record keeping deadlines for decorative chromium plating (hexavalent or trivalent) have passed. A company with a trivalent plating process should have filed an initial notification with the appropriate control authority* by July 24, 1995. This information (address and compliance method statement) should have been submitted on a standard from supplied by the U.S. Environmental Protection Agency (EPA).

The second reporting deadline was for the compliance status notification

and should have been done by February 24, 1996, 30 days after required final compliance (January 24, 1996). For those using a decorative trivalent process, this form includes address, material safety data sheets (MSDS), and wetting agent information. The same two deadlines apply to hexavalent chromium platers using wetting agents to demonstrate compliance. In addition, log books must be kept to record the date and time of additions of wetting agents and the surface tension measurements. If add-on pollution control technology is used to meet the emission standard, a stack test on the control equipment was required by July 24, 1996. The same two notifications apply. The date for the compliance status notification (address, O and M, data, limits, etc.), will vary (less than 90 days after test), but can be no later than October 24, 1996. Log books must be kept on the equipment for recording pressure drops or velocities (depending on the time of control equipment), as well as specific work practice standards (operation and maintenance plan) as specified in the regulation.

If a new tank was added, or an existing decorative plating tank was reconstructed, and came back on line, or initially started operation after the final rule on January 25, 1995, then compliance was required upon startup. Notification of construction or reconstruction was required in addition to initial notification. If the addition was begun prior to January 25, 1995, these could be sent together. If the addition was started after that date, the two notifications could be sent separately, but the initial notification could be sent no more than 30 days after the start-up of the new process.

Hard Chromium Platers Hard chromium plating facilities (large or small classification), or chromium anodizing facilities should have filed an initial notification by July 24, 1995 (same as for decorative platers). For chromium anodizers using wetting agents, the compliance status notification is due July 24, 1997, to demonstrate compliance. For facilities using add-on pollution control equipment, the deadline for conducting the performance test is July 24, 1997. Companies were required to notify the appropriate control authority of the scheduled test date at least 60 days prior to the test. This notification deadline was May 24, 1997. The stack testing is being done for the purpose of establishing operating parameters that the pollution control equipment can operate under, and be sure of maintaining compliance with, emission limitations. Typically, more than one test must be conducted to establish acceptable operating ranges.

For composite mesh pad (CMP) or fiber bed mist eliminators (FBME), the pressure drop across the unit is monitored and logged daily. For packed bed scrubbers (PBS), the inlet velocity and pressure drop are monitored and logged daily. Log books must be kept to demonstrate compliance. Results from stack testing are due at the control authority no later than October 24, 1997. This is also the latest date that the compliance status notification (including test data) can be submitted. Even if you wait until October 24 to officially notify the authorities about your compliance status, the regulatory deadline was January 24, 1997. If a test conducted now shows non-compliance, it would be assumed you were in non-compliance since January 24.

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^{*}State control authorities in states with approved air programs.