Initial Notification

National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations 40 CFR 63 Subpart WWWWWW

This notification applies to facilities that meet the following criteria:

- The facility uses a process that includes electroplating (other than chromium electroplating); electroless or non-electrolytic plating; other non-electrolytic metal coating (such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing and manganese phosphate coating) and thermal spraying; dry mechanical polishing; electroforming; and electropolishing, **and**
- The facility uses or has emissions of the following metal hazardous air pollutants (HAPs): cadmium, chromium, lead, manganese, and nickel. This does not include plating or polishing processes that use materials with less than 0.1% in weight of cadmium (Cd), chromium (Cr), lead (Pb), or nickel (Ni) and less than 1.0% of manganese (Mn) as reported on the Material Safety Data Sheet for that material.

Check this box if you meet the criteria and are subject to the requirements of 40 CFR 63 subpart WWWWWW ☐

Sources that commenced construction of their facility after March 14, 2008 are considered to be new sources and are required to be in full compliance with the requirements of 40 CFR Part 63 subpart WWWWWW by July 1, 2008 if the initial startup date is on or before July 1, 2008, otherwise, compliance must be achieved upon startup. Existing sources (commenced construction on or before March 14, 2008) have until July 1, 2010 to be in compliance. **All sources subject to this rule must complete and submit this initial notification by October 29, 2008.** *New sources must also submit their Notice of Compliance Status by initial startup.*

Illinois EPA Bureau of Air I.D. Number (if applicable): ______________________

Company Name: ______________________

Owner Name/Title: ______________________

Owner Address: ______________________

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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: ______________________

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Operator telephone number: ______________________

Operator email address (if available): ______________________

Address (physical location) of facility:

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

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

(2) Use the following table to list each tank and HAP emitted or used and the compliance methods that are utilized on each tank at this facility. Compliance methods include: use of wetting agent/fume suppressant (WAFS); control device; tank cover; time limit (for short-term electroplating only); management practices (MP) (*see page 5 of this form for a description of management practices*); or not applicable at this time (N/A).

Tank Description/ID No.	**HAP Emitted or Used (Cd, Cr, Pb, Mn, Ni)**	**Check all Compliance Methods Currently used at your Facility**	
		☐ WAFS ☐ Tank Cover ☐ Control Device	☐ MP ☐ Time Limit ☐ N/A
		☐ WAFS ☐ Tank Cover ☐ Control Device	☐ MP ☐ Time Limit ☐ N/A
		☐ WAFS ☐ Tank Cover ☐ Control Device	☐ MP ☐ Time Limit ☐ N/A
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		☐ WAFS ☐ Tank Cover ☐ Control Device	☐ MP ☐ Time Limit ☐ N/A
		☐ WAFS ☐ Tank Cover ☐ Control Device	☐ MP ☐ Time Limit ☐ N/A
		☐ WAFS ☐ Tank Cover ☐ Control Device	☐ MP ☐ Time Limit ☐ N/A

(3) ***By July 1, 2010, all thermal spray operations will be required to capture and control their particulate material (PM) emissions using an air pollution control device such as a water curtain, fabric filter, or other device with an equivalent level of control.***

Use the following table to list each permanent thermal spraying booth/line and each dry mechanical polishing process that is subject to subpart WWWWWW and the HAP emitted or used and if any air pollution control device is currently being used.

Check here if you do not have any thermal spray operations or dry mechanical polishing ☐

Thermal Spray Booth/Line or Dry Mechanical Polishing Description/ID No.	HAP Emitted or Used (Cd, Cr, Pb, Mn, Ni)	Any Air Pollution Control Device Used? (Yes/No)

(4) **Use the following table to list each temporary thermal spraying booths/lines subject to subpart WWWWWW and the HAP emitted or used and if any management practices currently being used. For the purposes of this rule, "temporary" means that that the thermal spraying booth/line is used less than one hour per day.**

Check here if you do not have any temporary thermal spraying booths/lines ☐

Spray Booth/Line Description/ID No.	HAP Emitted or Used (Cd, Cr, Pb, Mn, Ni)	Any Management Practices Used? (Yes/No)

(5) By July 1, 2010, the following management practices, as applicable and practicable, will be required at all facilities that are subject to 40 CFR 63 subpart WWWWWW.

- Minimize bath agitation when removing any parts processed in the tank, except when necessary to meet part quality requirements.
- Maximize the draining of bath solution back into the tank 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).
- Use tank covers, if already owned and available at the facility.
- Minimize or reduce heating of process tanks (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.
- 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.
- Maintain quality control of chemicals, and chemical 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.

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

___________________________________ (Signature)

________________________________ (Date)

___________________________________ (Name/title)

(____)________________________ (Telephone No.)

Submit this Initial Notification to <u>both</u> of the following addresses. It is important that you also keep a copy of this notification form for your own records.

United States Environmental Protection Agency Region V
Director, Air and Radiation Division, Branch AE-17J
77 West Jackson Blvd., Chicago, IL 60604–3507

Illinois Environmental Protection Agency
Bureau of Air, Compliance Section MC 40,
1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794