Flowchart for Determining Your Requirements Under The Plating and Polishing Area Source NESHAP (Subpart WWWWWW)

1. Is your facility a major source of HAP emissions?
   - Yes → Not subject to Plating and Polishing Area Source Rule
   - No → Do you use Cd, Cr, Pb, Mn, or Ni?

2. Is the tank or process one of the following?
   - Electroplating or electroforming w/pH<12
   - Electropolishing
   - Thermal spraying
   - Dry mechanical polishing
   - Yes → Limit plating time or use tank cover as required in §63.11507(b) and...
   - No → Is this short-term or "flash" electroplating?

3. Use a fabric filter or equivalent control device as required in §63.11507(e) or (f)
   - Yes → Implement management practices in §63.11507(g)
   - No → Use WAFS, control device, or tank cover as specified in §63.11507(a) and...

For More Information

This brochure is a general guide only. You may review the rule for your specific requirements at:
http://www.epa.gov/ttn/atw/area/arearules.html

For more information on state requirements, please contact your state representative found at the following link:
http://www.epa.gov/ttn/atw/area/table_state_contacts.doc or,
http://www.4cleanair.org/contactUsaLevel.asp
• Maximize the draining of bath solution back into the tank by extending drip time when removing parts from the tank.
• Optimize the design of barrels, racks and parts to minimize dragout of bath solution.
• Use tank covers whenever possible, if already owned and available at the facility.
• Minimize or reduce heating of process tanks, except when doing so would 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 using practices such as: 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 pretreated parts to be plated.
• Maintain quality control of chemicals 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.

What Am I Required to Do?
Specific Requirements:
• Non-cyanide electroplating and electroforming (pH<12), and electropolishing
  o Use wetting agent/fume suppressant (WAFS), control device, or tank cover
• Flash or short-term electroplating
  o Limit plating time to 3 min/hr or 1 hr/day, or use tank covers
• Other coating and plating; temporary thermal spraying, and all above electrolytic processes:
  o Management practices
• Dry mechanical polishing and permanent thermal spraying
  o Exhaust emissions to a control device
Management Practices: as applicable and practicable
• Minimize bath agitation when removing any parts processed in the tank except when necessary to meet part quality requirements.

What reports and records are required?
• Submit the Initial Notification and the Notification of Compliance Status.
• Prepare annual Certification of Compliance Report and Report of Deviations by January 31st. Submit both reports by January 31st of the following year if any deviations occurred during the previous year.