

Brief Summary
New EPA Regulations for
Plating and Polishing Facilities
40 CFR Part63 Subpart WWWW
Update January 2009

EPA has new requirements to reduce air pollution from Plating and Polishing facilities. The vapor from these facilities contain cadmium, chromium, manganese, nickel, lead, and other harmful chemicals that pose a health risk to anyone who breathes air containing them. This is a short summary of things that Plating and Polishing operations must do to comply with the new rule requirements. For more details and assistance, please talk to your local environmental contact.

Specific Requirements

- Compliance dates: Existing sources by 07/01/10; New sources upon start-up.
- Non-cyanide electroplating, electroforming or electropolishing with pH<12:
 - Use wetting agent/fume suppressant (WAFS), control device, or tank cover
 - Management practices to minimize or eliminate potential emissions
- Flash or short-term electroplating:
 - Use tank covers or limit plating time to 3 min/hr or 1 hr/day
 - Management practices to minimize or eliminate potential emissions
- Dry mechanical polishing and thermal spraying (permanent operations):
 - Exhaust emissions to a control device
- Cyanide electroplating (pH ≥12), non-electrolytic plating and coating operations (such as electroless nickel plating and chromate conversion coating), and temporary thermal spraying:
 - Management practices to minimize or eliminate potential emissions

Management Practices to Minimize or Eliminate Potential Emissions, as Practicable

- Keep tank liquid as still as you can when removing parts processed in the tank
- Make the drip time as long as you can when removing parts from the tank. Use drain boards (also known as drip shields) or remove parts slowly from the tank
- Design 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 whenever you can
- Minimize or reduce heating of process tanks whenever possible
- Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment
- Minimize bath contamination however possible by not dropping parts or quickly recovering dropped parts, using distilled/de-ionized water, filtering the water, pre-cleaning the parts before plating and rinsing pre-treated parts before plating
- Make sure that the chemicals and other bath ingredients are at the correct levels in the tank
- Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and washdowns when needed

(continued)

- Minimize spills and overflow of tanks as much as possible
- Use squeegee rolls in continuous or reel-to-reel plating tanks
- Perform regular inspections to identify leaks and other ways to prevent pollution

Report Preparation and Submissions

- Prepare and Submit Initial Notification:
 - Existing sources by 10/29/08
 - New sources by 10/29/08 or upon startup (*Note: this is a correction to rule*)
- Submit Notification of Compliance Status:
 - Existing sources by 07/01/10
 - New sources upon start-up
- Preparation of First Certification of Compliance Report
 - Existing Sources: January 31, 2011
 - New sources: January 31 of year following startup
 - Do not submit. Keep onsite unless there are deviations (see below)
- Annual Certification of Compliance Report
 - Prepare January 31 of each year following first Compliance Report
 - Do not submit. Keep onsite unless there are deviations
 - If there are deviations, submit with Deviation Report
- Deviation Report
 - If there are deviations, prepare and submit by January 31 of the following year
 - Include Annual Compliance Report with Deviation Report submission

Recordkeeping

- All required notifications and reports, with supporting data
- Records that show you meet the management practices
- For cyanide tanks, provide the one-time pH measurement value
- For non-cyanide tanks, provide the amount and frequency of WAFS additions
- For short-term or flash electroplating tanks, the daily plating time
- For tank with covers, the time the tank is operated with cover in place
- Records must be kept for a period of 5 years.

More Information

For more details and assistance, please talk to your local environmental contact. These web links to government contacts are a good place to start:

www.epa.gov/ttn/atw/area/regional_contacts.pdf
www.smallbiz-enviroweb.org/sba/sbap.html

The rule itself can be found at this link: www.epa.gov/ttn/atw/area/arearules.html