



Air Pollution Control Board

Greg Cox	District 1
Dianne Jacob	District 2
Pam Slater-Price	District 3
Ron Roberts	District 4
Bill Horn	District 5

June 9, 2010

NOTICE OF WORKSHOP

FOR DISCUSSION OF IMPLEMENTATION OF THE NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS SUBPART WWWWW – PLATING AND POLISHING OPERATIONS

The San Diego Air Pollution Control District (District) will hold a public workshop to discuss local implementation of the Code of Federal Regulations, Title 40, Part 63, Subpart WWWWW (6W) - National Emission Standards for Hazardous Air Pollutants (NESHAP): Area Source Standards for Plating and Polishing Operations. Comments or questions may be submitted in writing before, or made at, the workshop which is scheduled as follows:

DATE: Wednesday, July 7, 2010

TIME: 9:00 a.m. to 11:00 a.m.

PLACE: San Diego Air Pollution Control District
Main Conference Room
10124 Old Grove Road
San Diego, CA 92131

The U.S. Environmental Protection Agency (EPA) issued NESHAP 6W on July 1, 2008. It requires generally available control technology and management practices to limit emissions from area source plating and polishing operations of the following hazardous air pollutants (HAP): cadmium, chromium, lead, manganese and nickel. An area source is any facility that emits less than 10 tons per year (tpy) of any single HAP or less than 25 tpy of total combined HAP.

An owner or operator of an area source plating and polishing operation using any compound of cadmium, chromium, lead, manganese, or nickel is subject to NESHAP 6W if the facility is engaged in one or more of the following processes:

- Electroplating other than chromium electroplating;
- Electroless or non-electrolytic plating;
- Other non-electrolytic metal coating processes (such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating);
- Thermal spraying;

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- Dry mechanical polishing of finished metals and formed products after plating;
- Electroforming; or
- Electropolishing.

NESHAP 6W does **NOT** apply to the following:

- Operations subject to NESHAP N: Chromium Plating and Chromium Anodizing Tanks;
- Research and development process units;
- Process units used strictly for educational purposes;
- Thermal spraying conducted to repair surfaces;
- Dry mechanical polishing conducted to restore the original finish to a surface; or
- Any plating or polishing or thermal spraying process that uses materials containing cadmium, chromium, lead, or nickel in amounts less than 0.1% by weight or manganese in amounts less than 1.0% by weight.

Specifically, NESHAP 6W will require the following:

Existing sources: Existing sources are those that commenced construction or reconstruction on or before March 14, 2008.

- Submit Initial Notification to the District and EPA-Region IX by November 1, 2008.
- Comply with NESHAP 6W requirements by July 1, 2010.
- Submit Notification of Compliance Status by July 1, 2010.
- Maintain an Annual Certification of Compliance Report, completed by January 31st of each year.
- If process deviates from prior year, submit a Deviation Report along with the Annual Certification of Compliance Report by January 31st, immediately following the reporting period.

New or reconstructed sources: New or reconstructed sources are those that commenced construction or reconstruction after March 14, 2008.

- Submit Initial Notification to the District and EPA-Region IX within 120 days of start-up.
- Comply with NESHAP 6W requirements by initial start-up.
- Submit Notification of Compliance Status by initial start-up.
- Maintain an Annual Certification of Compliance Report, completed by January 31st of each year.
- If process deviates from prior year, submit a Deviation Report along with the Annual Certification of Compliance Report by January 31st, immediately following the reporting period.

The District requests that workshop participants bring their own copy of NESHAP 6W and related materials, which may be downloaded from the District's website at http://www.sdapcd.org/homepage/public_part/workshops/public_workshops.pdf or you may call Janet McCue at (858) 586-2712. If you have any questions concerning District implementation of requirements of NESHAP 6W, please contact Dustin Rice at (858) 586-2643 or Rob Reider at (858) 586-2640.

A handwritten signature in cursive script that reads "Rosa Maria S. Abreu".

ROSA MARIA S. ABREU, Assistant Director
Air Pollution Control District

RMA:DR:jlrm