

**AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO**

**FEDERAL SUBPART WWWWWW - NATIONAL EMISSION
STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR
PLATING AND POLISHING OPERATIONS AT AREA SOURCES**

WORKSHOP REPORT

A workshop notice concerning local implementation of Federal Subpart WWWWWW (6W) - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plating and Polishing Operations at Area Sources was mailed to all owners or operators of plating, polishing, or thermal spraying facilities permitted or otherwise known by the Air Pollution Control District (District). Notices were also mailed to all Economic Development Corporations and Chambers of Commerce in San Diego County, the U.S. Environmental Protection Agency (EPA), the California Air Resources Board (ARB), and other interested parties.

Forms and information for NESHAP 6W can be found on the District's website: http://www.sdapcd.org/homepage/public_part/workshops/public_workshops.pdf.

The workshop was held on July 7, 2010, and was attended by 16 people. The workshop comments and District responses are presented below. Where indicated, the responses represent EPA's determinations.

1. WORKSHOP COMMENT

What activity is considered research and development?

DISTRICT RESPONSE

Research and development is defined in §63.11511 as, "any process unit that is used for conducting research and development for new processes and products and is not used to manufacture products for commercial sale, except in a *de minimis* manner."

2. WORKSHOP COMMENT

Are both the Initial Notification form and the Notification of Compliance Status form required?

DISTRICT RESPONSE

No. The forms have been revised and posted to the District website such that only the Notification of Compliance Status form needs to be completed and submitted to the District.

3. WORKSHOP COMMENT

Once the Notification of Compliance Status form is filled out and submitted, will a facility need to submit this form again?

DISTRICT RESPONSE

No, the form only needs to be submitted once for an operation. However, if a facility alters the operation such that the information initially reported on the Notification of Compliance Status form is no longer accurate (such as a change in compliance method, the addition of operations, etc.), then the facility must submit to the District a Deviation Report as well as an Annual Certification of Compliance Report by January 31 of the year immediately following the relevant changes.

4. WORKSHOP COMMENT

Is the Annual Certification of Compliance Report an internal certification stating I certify my facility complies with NESHAP 6W?

DISTRICT RESPONSE

Yes. It is also worth noting that the Annual Certification of Compliance Report need not be submitted to the District unless a deviation from NESHAP requirements has occurred during the reporting year, in which case the Annual Certification of Compliance Report must be submitted along with a Deviation Report.

5. WORKSHOP COMMENT

Can you give an example of what is required for the Annual Certification of Compliance Report?

DISTRICT RESPONSE

The Annual Certification of Compliance Report requirements are detailed by compliance method in §63.11509(c)(1) through (7).

6. WORKSHOP COMMENT

If my facility is a major source but has a small plating operation, are we subject to NESHAP 6W?

DISTRICT RESPONSE

The area source applicability of NESHAP 6W is based on facility-wide emissions of hazardous air pollutants (HAP). The regulation defines an area source as a facility that emits or has the potential to emit less than 10 tons per year (tpy) of any single HAP or less than 25 tpy of any combination of HAP. If a facility emits more than the previous limits, the facility is not an area source and thereby not subject to NESHAP 6W. However, if your facility is a major source of other regulated air pollutants [volatile organic compounds (VOCs), particulate matter (PM), nitrogen oxides (NOx), or sulfur oxides (SOx)] but is an area source of HAP emissions, the facility would be subject to NESHAP 6W.

7. WORKSHOP COMMENT

Dry mechanical polishing is defined to occur [per §63.11504(a)(1)(iv)] "after plating" with any of the plating and polishing metal HAP. Does that mean that dry mechanical polishing is exempt if conducted after *thermal spraying* of a HAP-containing material?

EPA RESPONSE

No. Thermal spraying is considered a form of metal plating or coating. EPA will be amending the rule to clarify this point.

8. WORKSHOP COMMENT

Is dry mechanical polishing of non-plated parts that contain a metal HAP subject to this rule (e.g., a part that inherently contains nickel)?

EPA RESPONSE

No, but check for possible applicability to NESHAP XXXXXX: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, which also has dry mechanical polishing standards.

9. WORKSHOP COMMENT

My facility performs dry mechanical polishing of parts that are plated at another facility. Is my polishing operation subject to NESHAP 6W?

EPA RESPONSE

No, but check for possible applicability to NESHAP XXXXXX: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, which also has dry mechanical polishing standards.

10. WORKSHOP COMMENT

My facility performs thermal spraying to repair in-use shaft rotors. Does this qualify under the exemption for thermal spraying repair operations?

EPA RESPONSE

Yes. Any thermal spraying repair work is exempt with the exception of parts that are repaired for purposes of future sale.

11. WORKSHOP COMMENT

Is there a requirement for who has to sign the Annual Certification of Compliance Report?

EPA RESPONSE

A facility representative's signature, such as owner, operator, or environmental manager, fulfills the requirement (no third party verification is required). The Annual Certification of Compliance Report must be kept on site for five years and accessible for review.

DR:jl
10/21/10