



NESHAP 6W Notification of Compliance Status

NOTIFICATION OF COMPLIANCE STATUS FOR PLATING AND POLISHING SOURCES¹

(as amended on May 31, 2018)

This Notification of Compliance Status is to meet the requirements of §63.11509(b) of 40 Code of Federal Regulations (CFR), Part 63, Subpart WWWW (6W; *National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations*). Copies of the Federal Register (FR) notices can be found at the links below:

73 FR 37741, July 1, 2008 (<https://www.gpo.gov/fdsys/pkg/FR-2008-07-01/pdf/E8-14795.pdf#page=1>)

76 FR 57919, September 19, 2011 (<https://www.gpo.gov/fdsys/pkg/FR-2011-09-19/pdf/2011-23806.pdf#page=1>)

Due Date

If you are an existing source, you must submit this Notification of Compliance Status by close of business on July 1, 2010. Existing sources are those that were initially started up on or before March 14, 2008.

If you are a new source that initially started up after March 14, 2008, and on or before July 1, 2008, you must submit this Notification of Compliance Status by no later than July 1, 2008.

If you are a new source that initially started up after July 1, 2008, you must submit this Notification of Compliance Status upon initial startup of your affected source.

Name and Address (i.e., physical location) of Plating and Polishing Source

Print or type the following information for each facility for which you are making a Notification of Compliance Status:

Operating Permit Number (OPTIONAL)		Facility ID Number (IF KNOWN)	
<input type="text"/>		<input type="text"/>	
Facility Name			
<input type="text"/>			
Facility Street Address			
<input type="text"/>			
City		State	Zip Code
<input type="text"/>		<input type="text"/>	<input type="text"/>
Facility Local Contact Name		Title	Phone Number
<input type="text"/>		<input type="text"/>	<input type="text"/>
Email Address			
<input type="text"/>			

¹ *Plating and polishing facility* means a facility engaged in one or more of the following processes that uses or emits any of the plating and polishing metal hazardous air pollutants (HAP), as defined in 40 CFR §63.11511. The processes performed in plating and polishing tanks include the following: electroplating processes other than chromium electroplating (i.e., non-chromium electroplating) performed in a tank; electroless plating; and non-electrolytic metal coating processes, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; and electropolishing. This term does not include tanks containing solutions that are used to clean, rinse or wash parts prior to placing the parts in a plating and polishing process tank, or subsequent to removing the parts from a plating and polishing process tank. This term also does not include any bench-scale operation.

Name and Address of the Owner and the Operator

Print or type the following information for each facility for which you are making a Notification of Compliance Status:

Owner Name		
Owner Address		
City	State	Zip Code
Email Address		
Operator Name (if different than Owner)		
Operator Address (if different than Owner)		
City	State	Zip Code
Email Address		

Applicability and Compliance Status

NESHAP 6W applies to facilities engaged in the following types of process that emit or use materials that contain plating and polishing HAP.² Check the box of each process below that applies to the facility.

- | | |
|--|---|
| <input type="checkbox"/> Electroplating (noncyanide)
<input type="checkbox"/> Electroplating (cyanide)
<input type="checkbox"/> Continuous electroplating (noncyanide)
<input type="checkbox"/> Short-term electroplating (noncyanide)
<input type="checkbox"/> Electroless nickel

<input type="checkbox"/> Thermal spraying (permanent line)
<input type="checkbox"/> Thermal spraying (temporary, in-situ) | <input type="checkbox"/> Chrome conversion coating
<input type="checkbox"/> Electropolishing
<input type="checkbox"/> Electroforming
<input type="checkbox"/> Other electroless plating / coating / dipping

<input type="checkbox"/> Dry mechanical polishing |
|--|---|

NOTE: The operations listed above are affected sources under NESHAP 6W only if they use materials that contain or have the potential to emit plating and polishing metal HAP.

Complete Table 1 and Table 2 and selected the applicable management practices used at the facility on the following pages.

² *Plating and polishing metal HAP* means any compound of any of the following metals: cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn), or nickel (Ni), or any of these metals in the elemental form, with the exception of lead.

Table 1. Compliance Methods for Plating Tank Processes

Tank Process Description / ID No.	HAP Emitted or Used	Compliance Method(s) (Check all that apply)
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Tank cover <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Tank cover <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Tank cover <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Tank cover <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Tank cover <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Tank cover <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Tank cover <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices

Table 1. Compliance Methods for Plating Tank Processes (Continued)

Tank Process Description / ID No.	HAP Emitted or Used	Compliance Method(s) (Check all that apply)
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Tank cover <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Tank cover <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Tank cover <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Tank cover <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Tank cover <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Tank cover <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Tank cover <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices

Table 2. Compliance Methods for Thermal Spraying and Dry Mechanical Polishing Processes

Thermal Spray Booth / Line or Dry Mechanical Polishing Description / ID No.	HAP Emitted or Used	Compliance Method(s) (Check all that apply)
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Management practices (temporary thermal spraying only)
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Management practices (temporary thermal spraying only)
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Management practices (temporary thermal spraying only)
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Management practices (temporary thermal spraying only)
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Management practices (temporary thermal spraying only)
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Management practices (temporary thermal spraying only)
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Management practices (temporary thermal spraying only)
	<input type="checkbox"/> Cadmium (Cd) <input type="checkbox"/> Chromium (Cr) <input type="checkbox"/> Lead (Pb) <input type="checkbox"/> Manganese (Mn) <input type="checkbox"/> Nickel (Ni)	<input type="checkbox"/> Vented to a control device Describe: <input type="checkbox"/> Management practices (temporary thermal spraying only)

Applicability and Compliance Status (Continued)

Check the box of the applicable management practices used at this facility, as practicable.

- Minimize bath agitation when removing any parts processed in the tank, except when necessary to meet part quality requirements, as practicable.
- Maximize the draining of bath solution back into the tank, as practicable, 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), as practicable.
- Use tank covers, if already owned and available to the facility, whenever practicable.
- Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).
- Perform regular repair, maintenance, and preventative maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.
- 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, as practicable.
- Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.
- Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.
- Minimize spills and overflow of tanks, as practicable.
- Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.
- Perform regular inspections to identify leaks and other opportunities for pollution prevention.

Check the statement below that most accurately reflects the current compliance status of this facility.

- Yes, this facility is operating in compliance with all of the relevant standards and other requirements of NESHAP 6W, *National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations*.
- No, this facility is not operating in compliance with all of the relevant standards and other requirements of NESHAP 6W, *National Emissions Standards for Hazardous Air Pollutants: Air Source Standards for Plating and Polishing Operations*. Describe your reason for noncompliance below:

Submittal of Notification of Compliance Status

Maintain a copy of this Notification of Compliance Status for your records. Companies may submit a single NESHAP 6C Notification of Compliance Status for signed by the Responsible Party and attach a table or spreadsheet summarizing the general information, NESHAP 6C applicability, and compliance status for each facility. This Notification of Compliance Status should be sent to the following address:

Air & Water Quality Branch
Linn County Public Health
1240 26th Avenue Ct. SW
Cedar Rapids, IA 52404
Telephone: (319) 892-6000; Fax: (319) 892-6099

A digital copy of this Notification of Compliance Status may be submitted to the e-mail address below so long as the copy submitted is identical to the version retained in the facility records.

ComplianceReporting-Air@linncounty.org

Certification

I certify the truth, accuracy, and completeness of this notification.

_____ (Responsible Party³ – Signature)

_____ (Title) _____ (Date)

³ *Responsible Party* (or Responsible Official) is defined under 40 CFR §63.2 as any of the following: the president, vice-president, secretary, or treasurer of the company that owns the plant; the owner of the plant; the plant engineer or supervisor; a government official if the plant is own by the federal, state, city, or county government; or a ranking military officer if the plant is located on a military installation.