

**Sample Initial/Compliance Notification**  
**Tennessee Plating and Polishing Facilities affected by the**  
**National Emission Standards for Hazardous Air Pollutants: Plating and Polishing**  
**Operations (rule 6W)**

(For Sources not located in Davidson, Hamilton, Knox, Shelby Counties-These Counties should check with local air program)

**SECTION I: GENERAL INFORMATION**

Source Description-New/Existing:  Existing source: July 1, 2010 (constructed on or before March 14, 2008)  
 New source. \_\_\_\_\_ Date of Start up  
A New Source is a facility where construction began after March 14, 2008.

Company name: \_\_\_\_\_  
Facility name (if different): \_\_\_\_\_  
Facility (physical location) address: \_\_\_\_\_  
Owner name/title: \_\_\_\_\_  
Owner/company address: \_\_\_\_\_  
Owner telephone number: \_\_\_\_\_ Owner email address (if available): \_\_\_\_\_

Is the Operator the same person as the Owner? Yes  No

If the Operator information is different from the Owner, please provide the following:

Operator name/title: \_\_\_\_\_  
Operator Address: \_\_\_\_\_  
Operator telephone number: \_\_\_\_\_ Operator email address (if available): \_\_\_\_\_

**After review of the materials, it is determined that:**

This facility:  is **NOT** affected  
 **IS** affected  
by the National Emission Standards for Hazardous Air Pollutants: Plating and Polishing Operations (rule 6W)  
**--Proceed to SECTION 3 (last page) if NOT an affected source--**

**SECTION 2: IDENTIFICATION OF AFFECTED OPERATIONS<sup>B</sup>**

**(1) The following are the operations at this facility subject to subpart WWWW (check all that apply):**

Electroplating (non-cyanide)	<input type="checkbox"/>	Electroless nickel	<input type="checkbox"/>
Continuous electroplating (non-cyanide)	<input type="checkbox"/>	Chrome conversion coating	<input type="checkbox"/>
Short-term electroplating (non-cyanide)	<input type="checkbox"/>	Other electroless plating/coating/dipping	<input type="checkbox"/>
Electropolishing	<input type="checkbox"/>	Thermal spraying (permanent line)	<input type="checkbox"/>
Electroforming	<input type="checkbox"/>	Thermal spraying (temporary, in-situ)	<input type="checkbox"/>
Electroplating (cyanide)	<input type="checkbox"/>	Dry mechanical polishing	<input type="checkbox"/>

<sup>b</sup> **Important Note:** These operations are affected sources under subpart WWWW only if/when they use materials that contain or have the potential to emit Plating and Polishing metal HAP. Plating and Polishing **HAP containing/potential** is defined to be when the elemental form or compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead, are used or have the potential to be emitted in quantities of 0.1 percent or more, or 1.0 percent or more for elemental or compounds of manganese.

## Compliance Method Descriptions

(2) The following table lists the compliance methods used on each affected tank processes at this facility that were checked previously in item (1) in Section 2:

Tank Process Description/ID No. (use any unique number, letter or other identifier and include pH of the bath if applicable)	List HAP Emitted or Used (Cd, Cr, Pb, Mn, Ni)	Compliance Method(s) (Check all that apply)
		<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device; describe: _____ <input type="checkbox"/> Tank cover (percent covered: _____) <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices
		<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device describe: _____ <input type="checkbox"/> Tank cover (percent covered: _____) <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices
		<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device; describe: _____ <input type="checkbox"/> Tank cover (percent covered: _____) <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices
		<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device; describe: _____ <input type="checkbox"/> Tank cover (percent covered: _____) <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices
		<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device; describe: _____ <input type="checkbox"/> Tank cover (percent covered: _____) <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices
		<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device; describe: _____ <input type="checkbox"/> Tank cover (percent covered: _____) <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices
		<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device; describe: _____ <input type="checkbox"/> Tank cover (percent covered: _____) <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices
		<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device; describe: _____ <input type="checkbox"/> Tank cover (percent covered: _____) <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices
		<input type="checkbox"/> Wetting agent/fume suppressant <input type="checkbox"/> Vented to a control device; describe: _____ <input type="checkbox"/> Tank cover (percent covered: _____) <input type="checkbox"/> Time limit (short-term plating only) <input type="checkbox"/> Management practices

**(3) The following table lists each affected thermal spraying booths/lines (temporary and permanent), and dry mechanical polishing processes subject to subpart WWWW, noted previously in item (1) in Section 2:**

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

**(4) The following checked management practices are used at this facility, as practicable:**

- Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.
- 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 at 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 preventive 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.

**SECTION 3: CERTIFICATION (Check appropriate box)**

- Yes, the affected facility **IS** operating in compliance with all of the relevant standards and other requirements of 40 CFR Part 63 subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations
- No, the affected facility is **NOT** operating in compliance with all of the relevant standards and other requirements of 40 CFR Part 63 subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations

Reason for noncompliance:

---

I hereby certify that the information presented herein is correct to the best of my knowledge.

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(Name/title)

(\_\_\_\_\_)\_\_\_\_\_  
(Telephone No.)

**If you have questions about these environmental regulations affecting your business, contact Donovan Grimwood with the Tennessee Small Business Environmental Assistance Program at 1-800-734-3619 or at [BGSBEAP@tn.gov](mailto:BGSBEAP@tn.gov).**

**Submit the required information no later than July 1, 2010 to the following addresses:**

EPA Region IV Director, Air, Pesticides and Toxics Management Division ATTN: Notification of Compliance – Plating and Polishing GACT Atlanta Federal Center 61 Forsyth Street Atlanta, GA 30303–3104	<b><u>AND</u></b>	Tennessee Department of Environment and Conservation Division of Air Pollution Control ATTN: Notification of Compliance – Plating and Polishing GACT William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Avenue, 15th Floor Nashville, Tennessee 37243
---	-------------------	---